



Regulation 19 Representation Toolkit

There is a lot of information covered here, but we have done our best to break it down into manageable sections.

Buckinghamshire Local Plan 2045

ACT BY 11:59PM, SUNDAY 6 SEPTEMBER 2026 This Reg 19 stage is the final chance to make representations before submission. Late responses will not be accepted.

If you respond it is worth saying you want to take part in the examination hearings. You might not do so in the end but if you don't say this now you can't change your mind.

You can send in your response in the following ways:

- Through the website at www.buckinghamshire.gov.uk/local-plan
- By email to planningpolicyteam.bc@buckinghamshire.gov.uk
- By post to Planning Policy Team, Buckinghamshire Council, Walton Street, Aylesbury, HP20 1UA

You may find email easier than using the website, especially as you can then reference everything in a single document rather than a separate form for each policy..

Include your name & address and say whether you want to take part in the public enquiry.

1. What is Regulation 19?

Regulation 19 is the publication stage of the Local Plan process. Buckinghamshire Council has published its proposed Local Plan and is inviting representations before submission to the Planning Inspectorate for independent examination. This is the final opportunity to make formal representations before examination.

At this stage comments should focus on the following **Soundness Tests**, namely whether the Local Plan is:

- Legally compliant
- Positively prepared
- Justified
- Effective
- Consistent with national policy

General objections without planning evidence are unlikely to carry significant weight.

The housing strategy is the heart of the plan and that's what this information focuses on, although it discusses other areas as well.

It appears that Buckinghamshire has adopted a strategy that:

- Concentrates most growth in the north of the county.
- Avoids Green Belt releases in the south.
- Relies heavily on large strategic allocations.
- This means that the strategy depends heavily on large sites delivering later and as expected. Additionally the Council cannot demonstrate a five-year housing land supply in the early years.
- There is little contingency if those sites do not come forward.

If the strategy falters, the whole plan could come under pressure.

The parish council will be arguing that the Winslow New Expanded Settlement is of such a size that it threatens to change the area dramatically and must therefore have its own Statutory Supplementary Plan which should be required by the Local Plan to prevent poorly coordinated, sprawling development. It should cover all landowners and provide a long term strategy for the whole settlement. It should be prepared with the highest possible levels of community engagement. Buckinghamshire Council should use its significant land ownership within the Winslow North NESS to ensure the masterplan and infrastructure is delivered.

2. Best Practice Tips for a good response

Do

- Reference evidence.
- Use planning language.
- Identify the soundness test.
- Suggest specific changes.
- Focus on key strategic issues.

Avoid

- Repeating social media comments.
- Generic statements without evidence.
- Raising matters unrelated to planning.
- Submitting lengthy representations with no clear recommendation.

Top Tip

The most successful Regulation 19 representations usually:

1. Identify a specific policy or allocation.
2. Explain which soundness test is affected.
3. Present supporting evidence.
4. Recommend a precise modification.

This approach aligns closely with the matters that a Planning Inspector will consider during the examination of the Buckinghamshire Local Plan.

3. Understanding the Soundness Tests

Some examples:

A. Positively Prepared

Does the plan provide a strategy to meet development and infrastructure needs?

Potential concerns:

- Infrastructure requirements not identified.
- Housing growth unsupported by services.
- Local needs overlooked.

Example wording:

- I consider this policy is not positively prepared as it does not adequately provide for the infrastructure required to support the proposed level of development.
- The plan is not positively prepared as development does not match housing needs and employment growth in the south. This will stunt the employment growth in the south without suitable transport links e.g. Aylesbury East-West rail link.

B. Justified

Is this the most appropriate strategy based on proportionate evidence?

Potential concerns:

- Alternative sites not properly assessed.

- Evidence is incomplete or out of date.
- Better options exist elsewhere.

Example wording:

The allocation is not justified because insufficient evidence has been provided to demonstrate that it is the most appropriate site when compared with reasonable alternatives.

C. Effective

Can the policy or allocation realistically be delivered?

Potential concerns:

- Highway constraints.
- Utility capacity issues.
- Land assembly difficulties.
- Lack of school or healthcare provision.

Example wording:

The proposal is not effective because no clear mechanism is identified to deliver the necessary infrastructure required to support development.

D. Consistent with National Policy

Does the plan align with national planning policy?

Potential concerns:

- Insufficient protection for heritage assets.
- Biodiversity requirements inadequately addressed.
- Climate change measures lacking.

Example wording:

The plan does not allocate any grey belt land. This is not consistent with national policy to build on grey belt land in the most sustainable locations. It is also not justified as it has not therefore considered alternatives to 85% of the development being allocated within Aylesbury Vale.

4. Model Objection Wording

Example 1: Highway Capacity

- I object to Site Allocation XX / NESS Site 012. The allocation is not effective because the evidence provided does not demonstrate that the existing highway network can safely accommodate the scale of development proposed. No committed mitigation measures are identified and therefore the allocation fails the effectiveness test.
 - The A413 to Little Horwood Link Road is unsuitable to mitigate north-south traffic without an alternative to Little Horwood Road. The link road joins Little Horwood Road just before the railway underbridge. It would not be a suitable connection for over 9,000 homes and to replace an A-road in accordance with national policy and the Design Manual for Roads and Bridges.
 - Access from the A421 – There is no mitigation in place for the significant cumulative impact of traffic from Winslow sites to the north and towards Milton Keynes. Without mitigation the small villages of Great Horwood and Little Horwood will be significantly negatively affected and the A413 and surrounding roads would be at 85-100% capacity as shown in the Transport Modelling and Mitigation study.
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Example 2: Infrastructure

- I object to Policy XX as currently drafted. The policy does not identify how education, healthcare and community infrastructure will be delivered alongside development. The policy is therefore not positively prepared and is not effective.
 - The Plan does not demonstrate that NESS Site 012 is capable of being supported by the necessary infrastructure, which it is required to do.
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Example 3: Landscape Impact

I object to the allocation because insufficient evidence has been provided to demonstrate that the landscape impacts have been fully assessed. The allocation is therefore not justified.

Example 4: Settlement Coalescence

I consider that development of the proposed site would significantly reduce the separation between neighbouring settlements and erode local identity. The policy should be modified to protect the strategic gap between settlements.

5. Model Support Wording**Example 1**

I support Policy XX because it provides a clear framework for protecting biodiversity and strengthening environmental enhancement measures.

Example 2

I support the allocation because it is located adjacent to existing services, is deliverable and can be accessed safely.

Example 3

I support the infrastructure requirements identified in the policy and welcomes the commitment to phased delivery.

6. Supplementary Information**Template Checklist****Policy/Site Reference**

Policy Number:

Site Allocation:

Date:

Position

- ☐ Support
 - ☐ Object
 - ☐ Seek Modification
-

Soundness Test

- ☐ Positively Prepared
 - ☐ Justified
 - ☐ Effective
 - ☐ Consistent with National Policy
 - ☐ Legal Compliance
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Site Allocation Review Checklist**Deliverability**

- Is the site available?
- Is there developer interest?
- Are access arrangements realistic?

Highways

- Is the road network suitable?
- Are junctions already constrained?
- Are safe walking routes available?

Infrastructure

- School places available?
- GP capacity sufficient?
- Drainage capacity adequate?
- Broadband and utilities available?

Environment

- Impact on biodiversity?
- Impact on protected landscapes?
- Flood risk concerns?
- Impact on mature trees?

Heritage

- Effect on listed buildings?
- Effect on Conservation Areas?
- Effect on historic setting?

Community Impact

- Loss of open space?
 - Settlement coalescence?
 - Pressure on services?
 - Impact on character and identity?
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