

PART TWO

SOUNDNESS OF BUCKINGHAMSHIRE LOCAL PLAN AS A WHOLE

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SUMMARY OF WEEDON PARISH COUNCIL'S OBJECTIONS

Our ref	Issue	Test relied upon	Objections and Modifications Sought
PART TWO - SOUNDNESS – Buckinghamshire Plan as a Whole			
SBP1	Housing numbers are excessive and insufficiently justified	Soundness – Justified / Positively Prepared	The total housing requirement and distribution fail to take proper account of environmental, infrastructure and settlement constraints. Overall housing need in relation to spatial strategy to be reviewed.
SBP2	Deliverability	Soundness – Effective	Over-reliance on large-scale strategic sites. Reassess allocations to properly take account of where delivery is realistic and place, environment and infrastructure constraints can be overcome.
SBP3	Sustainability Appraisal	Soundness / Legal compliance	Reasonable alternatives and cumulative effects need to be demonstrably assessed.

SOUNDNESS

SBP1 - Housing numbers are excessive and insufficiently justified

The overall housing requirement and distribution across Buckinghamshire have not been adequately justified by the evidence base. Specifically they do not appear to take sufficient account of the environmental, transport and settlement constraints affecting the county.

The Parish Council considers that the Plan should demonstrate transparently that the proposed spatial strategy represents the most appropriate strategy when considered against reasonable alternatives.

Weedon Parish Council's position and modification sought

Review overall housing need in relation to spatial strategy.

SOUNDNESS

SBP2 - Deliverability

The Plan should only rely on housing allocations where there is convincing evidence that the proposed development is capable of being delivered during the Local Plan period. There is over-reliance on the delivery of strategic sites.

Strategic allocations should not be relied on to meet the housing requirement where significant infrastructure, transport, environmental or other constraints have not been shown to be surmountable.

The Parish Council considers that the deliverability of the proposed New and Expanded Settlements and Strategic Sites is therefore a critical component of the overall soundness of the Plan, and the deliverability criterion should be more heavily weighted in any reassessment.

Weedon Parish Council's position and modification sought

Reassess strategic sites for deliverability.

SOUNDNESS

SBP3 – Sustainability Appraisal, including overall methodology and assessment scores in New and Expanded Settlement Study

The Sustainability Appraisal should demonstrate that reasonable alternatives have been properly identified and assessed and that the cumulative effects of the proposed special strategy have adequately been considered. This is important in relation to the New and Expanded Settlement strategy where the choice of sites represents a major component of the Plan's proposed growth strategy.

The Parish Council is concerned that the evidence does not sufficiently demonstrate how the alternatives were assessed or how the Sustainability Appraisal informed the final selection of sites.

There is also a material question concerning the methodology used in the New and Expanded Settlement Study (NESS). The Parish Council considers that Buckinghamshire Council has not adequately demonstrated why criteria of potentially very different planning significance should carry identical weight in determining the overall suitability of a site.

New and Expanded Settlement Study Methodology and Assessment

NESS Part 3 Pro Forma Study Report (February 2026)

1. Each NESS site (18) considered in the **Part 3 Pro Forma NESS Study Report (February 2026)** received a score of between 1 and 5 on each of 23 different criteria in an Assessment Framework. The scores were added together to give a total summary score out of 115 points (5 x 23).
2. This gave equal weight to every individual criterion.

The Parish Council considers that this approach requires greater justification than is provided in the evidence base. There is no obvious reason why matters of potentially very different planning significance should necessarily have an identical influence on the final assessment of a strategic development location. Buckinghamshire Council should demonstrate why each criterion appears to have been given equal weight and specifically why the methodology is able to distinguish between fundamental matters and constraints of a lesser significance.

3. While the descriptions in the Assessment Framework of what would constitute a Low, Medium or High score were quite detailed, there is no indication of exactly how the final number score was allocated. Evidence was not given for what determined whether a criterion was given, for instance, a score of 1-Low or a 2-Low/Medium.

This is material because when all the scores are added up, what look like insignificant differences can add up to a big difference in the total. The methodology needs to show that those differences are evidence-based, consistent and capable of meaningful comparison.

4. The aggregate score was then converted to a percentage – the score as a percentage of the total possible. A raw score of 86 for the Aylesbury NESS in the Part 3 Pro Forma Report led to a

percentage summary figure of 75%. NESS sites were ranked according to this simple percentage on page 245 of the Part 3 Pro Forma Report.

The Assessment Framework and raw scores for all the NESS sites considered were given in the Part 3 Pro Forma Report on pages 243 to 251.

The Parish Council considers that the use of a simple aggregate score requires particular caution. A high overall score may disguise a major weakness under any given criterion while a low score may result from a series of relatively minor issues. The evidence must demonstrate that this is a sufficiently robust basis on which the strategic allocation of sites is determined.

NESS Part 3 Concept Framework Plans Updates (Stage 4)

5. There is no clear evidence for whether the Assessment Framework was adjusted for the 16 sites shown in the Stage 4 Study Report (July 2026), or whether the scoring system was adjusted, as no equivalent pages are given in the Stage 4 Report demonstrating how those sites were reassessed against the 23 criteria.

There is a significant evidential gap which does not establish clearly whether the Part 3 Pro Forma assessments remained applicable; whether the methodology was subsequently changed; whether individual scores were reconsidered; or whether final site configurations were assessed against the same criteria.

6. The Parish Council is concerned that even the material changes in the extent and layout of the NESS plans do not appear to be accompanied by a transparent re-assessment demonstrating that the original assessment results remain valid. For example, NESS003 Aylesbury has been significantly extended and changed between the Part 3 Pro Forma and the Stage 4 Report.
7. Where the proposed development has materially changed, Buckinghamshire Council should demonstrate that the final form of the proposed allocation, rather than the earlier iteration, has been assessed.
8. There is consequently no sufficiently clear evidence for why the final 10 NESS strategic site allocations in the Draft Plan have been made. The sites with the highest percentage scores from the Part 3 Pro Forms do not appear on their face to correspond directly with the final selection of sites.

For example, some high-scoring, positively rated sites from the Part 3 Pro Forms are not allocated in the Draft Plan – for instance, Wooburn/Bourne End (70%), Chesham (64%) and Chalfont St Peter (62%).

Conversely, other much lower-scoring sites – Cheddington (53%), Beachampton (57%) and Turweston (61%) – have been included in the Draft Plan allocations.

9. The Parish Council does recognise that Buckinghamshire Council may take account of other planning considerations. However, where the final allocations depart materially from its own assessment methodology, the evidence should clearly identify these considerations and their weight as well as consistent application to all potential sites and that the final selection is the most appropriate strategy compared with reasonable alternatives.

If the NESS evidence cannot reliably show that selected sites are the most appropriate locations for proposed development, this goes to the very crux of whether the spatial strategy is justified.

Furthermore because the delivery of housing depends to a large extent on the NESS allocations, any uncertainty over their suitability also raises an issue as to whether the Plan is effective.

The Parish Council therefore considers that these matters should be addressed before the Plan can properly be regarded as sound.

Weedon Parish Council seeks the following modifications

The strategy of New and Expanded Settlements should be re-evaluated.

If the strategy itself is found to be sound, the framework assessments and their criteria and scoring should be published with clear explanations.

The individual NESS studies should be re-assessed if their masterplans changed significantly, confirming that the masterplans being considered are the ones being assessed – not previous iterations.

The final choice of NESS sites to be taken into the Plan should be fully justified with evidence shown and comparisons with other reasonable alternative locations detailing any material departure from the results of NESS assessments.

If a reassessment shows that the NESS strategy or any individual allocation is not justified, deliverable or otherwise sound, the spatial strategy and housing distribution should be modified accordingly.

Evidence relied upon:

1. Buckinghamshire New and Expanded Settlement Study Part 3 Site Pro Forms and Assessment February 2026. Prepared by AECOM for Buckinghamshire Council
2. Buckinghamshire New and Expanded Settlement Study Part 3 Concept Framework Plans Updates (Stage 4) July 2026. Prepared by AECOM for Buckinghamshire Council