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**By email only to [planningpolicyteam.bc@buckinghamshire.gov.uk](mailto:planningpolicyteam.bc@buckinghamshire.gov.uk)**

My Ref.: F:\Planning\Responses\

Dear Sir/Madam

### **The Local Plan for Buckinghamshire – Discovery and Exploration consultation**

Thank you for consulting the Chilterns Conservation Board on the Local Plan for Buckinghamshire. Please note that this is an initial high-level response from Officers pending anticipated future specific engagement on the plan with the Board.

We note that the questionnaire format of this phase of the consultation on the Local Plan was clearly aimed at residents, rather than formal or statutory stakeholders. Our thinking on the Plan so far is not entirely conducive to a response in the multiple choice/ranking format of the questionnaire. Nonetheless, we consider it important to offer the following high level observations, set out as far as possible in line with the questionnaire structure. We look forward to opportunities to engage directly with the Council and its Officers in the evolution of the Plan.

#### **1. What do you most value about where you live?**

The Chilterns Conservation Board naturally considers that the character, richness of nature, cultural heritage and scenic beauty of the Chilterns AONB is of great value to the social, economic and environmental well-being of Buckinghamshire and its residents. The AONB is perhaps the area's greatest single asset and should be described as such, rather than as an unreasonable constraint on development in the south of the county. Policies that promote the conservation, enhancement, understanding and enjoyment of the AONB should be a consistent and prominent feature of the new local plan.

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## **Homes (Qs 2-7)**

The south of the county is largely covered by AONB and/or Green Belt designations. Natural England is currently considering proposals to extend the AONB, which may mean greater overlap of the AONB across the Green Belt in the far south of the county and Thames valley, and could also include areas north of the Chilterns scarp that are not currently designated either as AONB or Green Belt.

The National Planning Policy Framework clearly allows local authorities to plan for less development than has been identified as the local development need where assets such as AONB and Green Belt apply. We strongly advise that the local plan carefully considers the extent to which the full identified development needs can be met in the county without causing harm to the character and natural beauty of the AONB and sets the local plan requirements for development accordingly. This has not always been the case with earlier local plans, and the amount of land allocated for development within the AONB through those local plans, and the types of developments so allocated, have not always been entirely compatible with the “highest status of protection” that the NPPF affords to the designation.

Once the local plan requirements for development have been set, taking account of the extent of the AONB in the county, then the strategic distribution of development across the county must also take account of the designation. That is not to say that no development should take place within the AONB, of course, but the focus of development here must be to meet the needs of communities within the AONB, where this is compatible with the purposes of the designation, including prioritising the provision of social, key-worker and other forms of affordable homes. Development on brownfield sites and limited infilling in settlements within the AONB can be acceptable, but on the whole development should be robustly limited both to conserve the character of the AONB and also maximise the contribution that can be made to affordable and key worker housing here through a robust exceptions sites policy.

## **Q8. Improvements to the natural environment**

It is disappointing that the supporting text to this question refers generically to land of “great landscape and environmental value” without specifically referring to the Chilterns AONB – arguably the county’s greatest environmental asset – which the NPPF describes as deserving of the “highest status of protection” as a result of its landscape quality. Note that, while the AONB designation refers to ‘natural beauty’ and AONBs are referred to in the NPPF under the section on the natural environment, the designation is very much concerned with both natural and cultural heritage, and we would seek to ensure that the local plan recognises this.

This section of the questionnaire does not seek views on what aspects of nature (or the wider environment, including cultural heritage) should be protected, and how, but moves straight on to ‘improvements’ to the natural environment, thereby skipping several steps in the generally accepted mitigation hierarchy. There is no statement explaining how such improvements will be sought or resourced, but the underlying assumption is clearly that

these will be sought as outcomes from development, for example through biodiversity net gain.

#### **Q9. Views on supporting the local economy**

This question appears to assume that economic activity must take place on 'employment sites' accessed that are 'easy to get to', which fails to recognise the contribution of retail, agriculture and tourism to the local economy, and also the increasing contribution of more dispersed patterns of economic activity (including home and other forms of remote working) that have become increasingly prevalent since the Covid-19 pandemic.

There are plenty of strategic scale employment areas in the county, many of which could be utilised more effectively, and it is questionable whether such a buoyant area as Buckinghamshire needs more land designated for employment uses, especially when the prevalent forms of new employment (logistics) have a poor jobs per hectare ratio.

It will, however, be important to (a) promote regeneration in the areas of deprivation within the county – which includes rural as well as urban areas, and (b) protect employment areas – particularly small, low-rent premises in towns, villages and on farms – from conversion to residential uses under permitted development rights.

#### **Q10. Climate change**

The Board fully supports the attention being paid to addressing climate change through the local plan. We would recommend that the conservation and enhancement of the Chilterns AONB is specifically recognised as being a key asset in this regard. Protecting areas that are rich in nature at a landscape scale and on a permanent basis is one of the most effective ways in which to promote both carbon sequestration and nature recovery.

#### **Q12. Strategic issues**

Naturally, the Board would promote as the top priority the conservation and enhancement of the Chilterns AONB. Strategically, we would also recommend that the local plan includes a commitment to work with the other local authorities that benefit from inclusion of parts of the AONB and its setting towards a joint strategic approach to the AONB, including a consistent set of strategic and development management policies as well as reference to the Chilterns Buildings Design Guide and other guidance produced by the CCB as material considerations in the planning process.

#### **Q13. Anything else?**

The Board would be grateful if the local plan included reference to, and specific policies on, the conservation and enhancement of the area's globally scarce chalk streams and the protection and management of the quality and quantity of water in the Chilterns chalk aquifer.

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I hope that the above is of use in developing the local plan, and look forward to engaging with the Council more fully on this in due course.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'M Thomson', with a long horizontal flourish extending to the right.

Dr Matt Thomson MRTPI AoU  
Planner, Chilterns Conservation Board

cc.



**The Chilterns Area of Outstanding Natural Beauty**

The Chilterns AONB was designated in 1965 for the natural beauty of its landscape and its natural and cultural heritage. In particular, it was designated to protect its special qualities which include the steep chalk escarpment with areas of flower-rich downland, woodlands, commons, tranquil valleys, the network of ancient routes, villages with their brick and flint houses, chalk streams and a rich historic environment of hillforts and chalk figures.

**Chilterns Conservation Board**

The Chilterns Conservation Board is a statutory independent corporate body set up by Parliamentary Order in 2004 under the provisions of Section 86 of the Countryside and Rights of Way (CRoW) Act 2000.

The Board has two statutory purposes under section 87 of the CRoW Act:

- a) To conserve and enhance the natural beauty of the AONB; and
- b) To increase the understanding and enjoyment by the public of the special qualities of the AONB.

In fulfilling these roles, if it appears that there is a conflict between those purposes, Conservation Boards are to attach greater weight to (a). The Board also has a duty to seek to foster the economic and social well-being of local communities within the AONB.

Like all public bodies, including ministers of the Crown, local authorities and parish councils, the Chilterns Conservation Board is subject to Section 85 of the CRoW Act which states under "General duty of public bodies etc"

"(1) In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty."

**List of Organisations providing Nominees to the Chilterns AONB Conservation Board**

The Chilterns Conservation Board has 27 board members, all drawn from local communities; these are elected by:

- Hertfordshire and Oxfordshire County Councils
- Buckinghamshire, Central Bedfordshire and Luton Borough Councils (unitary authorities)
- Dacorum Borough and North Hertfordshire, South Oxfordshire and Three Rivers District Councils
- The Central Bedfordshire, Buckinghamshire, Hertfordshire and Oxfordshire Parish Councils (6 elected in total), and
- The Secretary of State for the Environment, Food and Rural Affairs (8 in total).