

ASHENDON PARISH COUNCIL

Regulation 19 Representation

Draft Local Plan for Buckinghamshire 2024–2045

1. Introduction

Ashendon Parish Council welcomes the opportunity to comment on the Regulation 19 Draft Local Plan for Buckinghamshire.

The Parish Council made a detailed representation during the Regulation 18 consultation. We supported the principle of directing housing and employment growth towards sustainable locations and supported the continued economic role of Westcott Venture Park. At the same time, we raised particular concerns about the indirect and cumulative consequences of development for small rural settlements such as Ashendon.

Our Regulation 18 representation identified:

- existing commuter and HGV traffic through Ashendon and on the C66 between Ashendon and Westcott;
- the unsuitability of narrow rural roads for increasing numbers of heavy and fast-moving vehicles;
- cumulative traffic generated by development in neighbouring settlements;
- the need for the proposed Waddesdon Freight Zone or equivalent freight-management measures;
- the likely effects of continued employment growth at Westcott Venture Park;
- the need for enforceable traffic and construction-management arrangements;
- early delivery of necessary infrastructure; and
- protection from noise, light pollution, environmental harm and loss of rural tranquillity.

Ashendon Parish Council continues to support appropriately planned economic and housing growth. Our Regulation 19 representation is therefore not an objection to the overall principle of growth or to Westcott Venture Park as an employment centre.

We welcome several provisions introduced or strengthened in the Regulation 19 Plan which respond positively to issues raised by the Parish Council.

However, having reviewed the Regulation 19 Plan and the new transport evidence published alongside it, we consider that one significant issue remains unresolved: the Plan has not adequately demonstrated that the cumulative transport consequences of strategic growth, particularly at Westcott Venture Park, can be accommodated without unacceptable displacement of general traffic, freight and HGV movements onto the minor rural highway network surrounding Westcott, including Ashendon Road/C66 and roads through and around Ashendon.

A further concern has arisen from direct experience between the Regulation 18 and Regulation 19 consultations. A prolonged emergency water-tanking operation in Ashendon during June and July 2026 demonstrated the vulnerability of rural utility infrastructure under peak conditions and the serious secondary highway, pedestrian-safety, environmental and amenity consequences when that infrastructure lacks resilience. This new evidence is addressed under Policies IN1 and IN3.

Our objections therefore relate principally to the soundness and effectiveness of Policy WES01, together with its interaction with Policies TR1, TR5, IN1 and IN3 and the supporting Strategic Transport Assessment and Transport Modelling and Mitigation Log.

2. Summary of Ashendon Parish Council's position

Policy / Evidence	Parish Council position	Assessment against Ashendon's concerns	Change sought
SP2 – Housing Strategy	Support	Directing significant growth towards more sustainable settlements and limiting housing elsewhere in rural areas substantially addresses concern about disproportionate housing growth in Ashendon.	Retain the policy approach and Ashendon's position as a small rural settlement not identified for significant planned growth.
HO10 – Windfall Policy	Support	Helpful protection requiring development to reflect settlement character and demonstrate adequate infrastructure, including transport capacity.	Retain.
WES01 – Westcott Enterprise Zone and Venture Park	Object unless modified	The allocation permits a substantial scale of B2 industrial and B8 storage/distribution development capable of generating commercial and freight movements. It does not expressly protect surrounding villages and unsuitable rural roads from displaced HGV, freight, employee and construction traffic.	Require a site-wide cumulative Transport and Freight Management Strategy and explicit protection of neighbouring rural settlements and unsuitable rural roads.
TR1 – Transport requirements for new developments	Support subject to modification/clarification	Its cumulative-impact provisions support our concerns, but assessment must consider vehicle type, road suitability and displacement as well as overall traffic volumes and congestion.	Clarify that assessment must include displacement from existing congestion and junction capacity issues on A41, A418 onto minor rural roads, HGV/freight effects, road suitability and cumulative route impacts.
TR2 – Transport improvements	No fundamental objection	Provides a strategic framework but does not itself resolve displacement of development-generated traffic onto unsuitable rural roads.	Ensure strategic mitigation does not transfer impacts from principal roads onto the minor rural network.
TR5 – Freight and logistics	Support subject to strengthening	Directly supports the concern that freight movements should not cause significant local harm, but needs a stronger link to strategic employment allocations such as WES01.	Link TR5 explicitly to WES01 and require suitable freight routes, routing controls and monitoring.
IN1 – Infrastructure delivery	Support	Reflects the Regulation 18 request for infrastructure to be delivered alongside, rather than after, development.	Ensure necessary transport, freight and utility measures are secured before occupation/intensification generating the relevant impacts.
IN3 – Water infrastructure	Support subject to strengthening / evidence update	The policy requires adequate water-supply capacity before occupation. The June–July 2026 Ashendon tankering operation demonstrates that resilience and peak-demand performance matter as well as nominal connection capacity.	Require assessments to consider resilience and peak-demand conditions; phase growth until reinforcement is operational; update relevant evidence where necessary to reflect recent supply-resilience incidents.
NE20 – Landscape character and visual amenity	Support	Provides protection for landscape character and rural tranquillity.	Retain.
NE21 – Pollution, air quality and contaminated land	Support	Provides safeguards against significant noise and pollution impacts.	Retain.
Strategic Transport Assessment	Concern / supporting evidence for objection	The Council's evidence identifies traffic choosing small rural lanes to avoid congestion and identifies	Demonstrate specifically how the rural network surrounding Westcott is affected and mitigated.

		Westcott as an area of significant modelled change.	
Transport Modelling and Mitigation Log – H310/J46	Object to reliance unless clarified and evidenced	H310/J46 provides an improved outbound vehicular connection between Westcott Venture Park and Ashendon Road. Its effects on Ashendon Road/C66, HGV routing and the wider rural network are not clearly demonstrated in the published Strategic Transport Assessment.	Do not rely on H310/J46 unless traffic flows, vehicle classes, HGV restrictions, route effects and cumulative impacts are demonstrated and acceptable.

3. Policy SP2 and HO10 – housing strategy and Ashendon's rural status

Parish Council position: SUPPORT

Ashendon Parish Council welcomes the approach taken in Policy SP2 of directing growth according to the settlement hierarchy and limiting housing development elsewhere in rural areas.

This substantially responds to concerns expressed at Regulation 18.

Ashendon is a small rural village with very limited services and public transport. Significant planned housing growth within the village would generate a high dependency on private-car journeys inconsistent with locating growth where services and infrastructure are available.

Policy HO10 also provides an important safeguard by requiring windfall development to be of a scale, density and character appropriate to the settlement and by requiring necessary infrastructure capacity, including transport infrastructure.

The Parish Council therefore supports SP2 and HO10 and asks that the final Plan continues to recognise Ashendon as a small rural settlement not intended to accommodate significant strategic housing growth.

Soundness position: Policies supported.

Change sought: None, other than confirmation and retention of Ashendon's present position within the settlement strategy.

4. Policy WES01 – Westcott Enterprise Zone and Venture Park

Parish Council position: OBJECT – MODIFICATION REQUIRED

Ashendon Parish Council supports Westcott Venture Park's continuing role as an important employment, research and technology centre. This is consistent with the position we took at Regulation 18.

However, the scale and nature of the Regulation 19 allocation make effective transport safeguards essential.

Policy WES01 identifies Westcott as a strategic employment area providing for substantial employment growth, including uses capable of generating commercial and freight movements such as general industrial and storage/distribution uses.

The potential generation of commercial vehicles and freight traffic is therefore an inherent consequence of the uses permitted by the allocation and cannot reasonably be treated solely as a matter for individual future planning applications.

The Parish Council welcomes provisions within WES01 relating to sustainable transport, neighbouring amenity and the rural setting.

However, there is no sufficiently explicit requirement within WES01 to ensure that growth at the strategic employment site does not result in unacceptable displacement of employee, commercial, construction, freight or HGV traffic onto surrounding minor rural roads or through neighbouring rural settlements.

This is particularly relevant to Ashendon because Ashendon Road/C66 provides a direct rural route north of Westcott.

The Parish Council considers this a matter of soundness because the suitability of the surrounding highway network is directly relevant to whether the proposed scale and range of employment uses at Westcott can be delivered effectively over the Plan period.

Modification sought to WES01

The Parish Council requests an additional requirement within WES01 along the following lines:

Development within the Westcott Strategic Employment Area shall be supported by a site-wide cumulative Transport and Freight Management Strategy. The Strategy shall demonstrate that existing, committed and proposed development at Westcott will not result in unacceptable displacement of employee, freight, HGV or construction traffic onto unsuitable rural roads or through neighbouring settlements. It shall identify suitable freight routes, necessary highway and freight-management measures, monitoring arrangements, delivery triggers and, where necessary, enforceable routing restrictions.

This assessment should specifically consider Ashendon Road/C66 and the connected rural highway network.

Tests of soundness: Justified and Effective.

5. Policy TR1 – Transport requirements for new developments

Parish Council position: SUPPORT SUBJECT TO MODIFICATION / CLARIFICATION

The Parish Council supports the principle and much of the substance of Policy TR1, including its treatment of highway safety and residual cumulative impacts.

Those provisions support the approach advocated by Ashendon Parish Council at Regulation 18: major developments should not be considered individually where several developments may place pressure on the same rural road network.

However, Buckinghamshire's own Strategic Transport Assessment demonstrates why a stronger rural-network safeguard is necessary. The Assessment identifies development traffic beyond the major road network and refers to indirect and undesirable trip routes, including small rural lanes, being selected to avoid congestion.

This directly supports the Parish Council's longstanding concern that the effect on Ashendon may arise not simply from the total amount of development-generated traffic, but from where that traffic chooses or is enabled to travel.

For small rural settlements, an assessment based predominantly upon delay or junction capacity may not adequately capture the effects of large vehicles using roads which are narrow, lack pavements and are unsuitable for substantial HGV movements.

Modification/clarification sought to TR1

- displacement and route choice on the wider road network;

- impacts on minor rural roads as well as classified or strategic roads;
- vehicle composition, including HGV and commercial traffic, rather than total vehicle numbers alone;
- the physical suitability of roads for the type of traffic generated;
- cumulative effects of existing, committed and allocated development; and
- appropriate monitoring and enforceable mitigation.

Tests of soundness: Effective and Justified.

6. Policy TR5 – Freight and logistics

Parish Council position: SUPPORT SUBJECT TO STRENGTHENING

Ashendon Parish Council particularly welcomes Policy TR5. The policy framework recognises that freight and logistics proposals should not cause significant local harm and that employment sites require suitable freight access arrangements.

This directly reflects concerns raised by the Parish Council at Regulation 18.

The Parish Council has consistently supported the principle behind the proposed Waddesdon Freight Zone because existing HGV movements already affect villages and rural roads in this part of Buckinghamshire.

However, the policy remains general. Where the Local Plan itself allocates a strategic employment site for uses including general industrial and storage/distribution, the Plan should make a direct connection between the allocation and freight-management policy.

Modification sought

TR5 and/or WES01 should establish that strategic employment development at Westcott must demonstrate suitable freight routes and must avoid unacceptable routing of HGVs through neighbouring settlements or along rural roads unsuitable for such traffic.

- enforceable freight-routing arrangements where required;
- monitoring of freight movements;
- review mechanisms where unacceptable routing occurs; and
- coordinated delivery of wider freight-management measures, including the principles underpinning the Waddesdon Freight Zone.

Tests of soundness: Effective.

7. Strategic Transport Assessment – rural traffic displacement

Parish Council position: CONCERN REGARDING ADEQUACY OF EVIDENCE

The Strategic Transport Assessment is particularly important because it confirms a transport effect which Ashendon Parish Council raised at Regulation 18.

The Assessment indicates that development traffic is not confined to the major road network and identifies the use of small rural lanes as indirect and undesirable routes to avoid congestion. It also acknowledges that highway interventions can redistribute traffic and congestion to other parts of the network.

The Parish Council considers this highly relevant to Ashendon.

Yet the published Strategic Transport Assessment does not clearly demonstrate the resulting traffic flows on the minor rural network surrounding Westcott or separately explain the effect of HGV/freight traffic on those roads.

The Parish Council accepts that detailed planning applications will necessarily require further assessment. However, there is an important distinction between detailed scheme design and demonstrating at Local Plan stage that a strategic allocation can be accommodated without unacceptable consequences elsewhere.

For Ashendon, an insignificant delay effect at Westcott is not the same as demonstrating an insignificant impact on surrounding rural roads. A mitigation measure which reduces delay by redistributing traffic could produce an adverse effect elsewhere.

Tests of soundness: Justified and Effective.

8. Transport Modelling and Mitigation Log – H310 and J46

Parish Council position: OBJECT TO RELIANCE ON H310/J46 AS MITIGATION UNTIL ITS EFFECTS ARE DEMONSTRATED

This issue has emerged from evidence published at Regulation 19 and was therefore not available to the Parish Council when its Regulation 18 representation was prepared.

The Transport Modelling and Mitigation Log identifies H310 – Westcott Venture Park Ashendon Road link improvements – and J46 – Ashendon Road / Westcott Venture Park access junction. The description refers to upgrading an existing track for public use and an outbound vehicular movement onto Ashendon Road.

This is directly material to Ashendon Parish Council. Our Regulation 18 representation specifically identified the C66 between Ashendon and Westcott as unsuitable for increasing HGV and commuter traffic and requested that neighbouring rural settlements be protected from commercial and construction through-traffic.

The key unanswered question is: to what extent does the modelled performance of Westcott depend upon H310/J46 redistributing traffic from Westcott Venture Park onto Ashendon Road and the adjoining rural road network?

The published description does not, in a form readily capable of scrutiny, establish forecast flows on Ashendon Road/C66 with and without the intervention, onward routing, vehicle composition, or whether HGV and construction traffic would be prohibited.

Modification / additional evidence sought

Ashendon Parish Council requests that H310/J46 should not be relied upon as mitigation supporting Policy WES01 unless and until Buckinghamshire Council demonstrates:

1. the precise location and intended strategic function of H310/J46;
2. the forecast number of vehicles using the link;
3. forecast flows with and without H310/J46;
4. the destination and onward routing of vehicles leaving the link;
5. the vehicle classes permitted to use it;
6. whether HGV and construction traffic would be prohibited;
7. the resulting impact on Ashendon Road/C66 and the connected rural road network;
8. cumulative effects alongside existing, committed and allocated development;
9. highway-safety and rural-amenity consequences; and
10. appropriate monitoring, enforcement and mitigation arrangements.

If H310/J46 would materially increase HGV, commercial or other traffic travelling towards Ashendon or through unsuitable adjoining rural roads, an alternative mitigation strategy should be identified.

Tests of soundness: Justified and Effective.

9. Policy IN1 – Infrastructure delivery

Parish Council position: SUPPORT

Ashendon Parish Council welcomes Policy IN1.

At Regulation 18 we emphasised that infrastructure required to address development impacts should be provided early and proportionately, rather than retrospectively after unacceptable consequences have arisen.

Policy IN1 is consistent with that principle. For Westcott and other strategic growth, transport, freight and utility mitigation should be established before development or intensification generating additional impacts is occupied.

The effectiveness of the policy will therefore depend on robust delivery triggers, not merely the identification of mitigation that is subsequently deferred.

Soundness position: Support.

10. Policy IN3 – Water Infrastructure: infrastructure capacity and resilience

Parish Council position: SUPPORT SUBJECT TO STRENGTHENING AND UPDATED EVIDENCE

Ashendon Parish Council supports the principle of Policy IN3 – Water Infrastructure. The policy requires development to demonstrate adequate water-supply infrastructure, requires distribution-system capacity to be demonstrably adequate before occupation, and provides for phasing so that required water-supply and wastewater capacity is in place.

Recent events in Ashendon demonstrate why these requirements are essential, but also why implementation should address resilience and peak-demand capacity, rather than simply whether a development can technically be connected to the network.

Between 1 June and 15 July 2026, Ashendon experienced a prolonged emergency water-supply operation. To maintain supply to customers, approximately four 28,000-litre articulated water tankers per hour operated continuously, 24 hours a day, seven days a week, supplying two local reservoirs.

The Parish Council considers this highly relevant new evidence arising since the Regulation 18 consultation.

The incident demonstrated not only vulnerability within the rural water-supply network, but also significant secondary consequences when essential utility infrastructure lacks sufficient resilience: substantial HGV movements on minor rural roads; damage to road surfaces and vulnerable verges; highway and pedestrian-safety concerns on roads without pavements; interruption of safe non-car movement; continuous noise and disturbance; and the environmental and carbon impacts associated with prolonged road tankering.

The Parish Council does not assert that planned development caused this 2026 incident. Rather, the incident provides direct evidence of the consequences of inadequate network resilience and demonstrates why future growth must not be permitted to exacerbate known or emerging capacity and resilience constraints.

The Local Plan proposes substantial housing and employment growth across Buckinghamshire. Infrastructure assessment should therefore consider not merely nominal connection capacity but whether the underlying distribution network has sufficient operational resilience to accommodate existing and future demand during peak or abnormal conditions without prolonged emergency intervention.

This concern is directly relevant to IN3 and IN1 and also has consequences under TR1 and NE21 because utility failure can itself generate substantial HGV movements, highway-safety impacts, noise and amenity effects.

We also raise concern about the methodology of using pumping stations and tankers for waste-water, and for other services adapted for small communities that become unsustainable with growth, such as the reliance on copper for delivery of internet connections. These are fragile methods of service delivery that cannot be relied upon for growth.

Modification / clarification sought to IN3

Ashendon Parish Council requests that Policy IN3 and/or its supporting text be modified to make clear that:

11. assessment of water-supply infrastructure must consider network resilience and peak-demand conditions, as well as nominal connection capacity;
12. infrastructure assessments must consider the effect of planned growth on existing users, including the risk of reduced resilience elsewhere in the distribution network;
13. where reinforcement is necessary, development should be phased so that the required infrastructure is operational before occupation or intensification generating the additional demand;
14. reliance upon routine or prolonged emergency measures, including road tankering, should not be treated as evidence of adequate infrastructure capacity;
15. infrastructure assessment should take account of wider consequences of network failure, including HGV movements, highway damage, pedestrian safety, noise, carbon emissions and community amenity; and
16. the Council should ensure that its Water Cycle Study and Infrastructure Delivery Plan take account of significant recent supply-resilience incidents where those incidents provide material evidence about the capacity or resilience of networks serving areas affected by planned growth.

The Parish Council does not suggest that the Local Plan itself can resolve operational failures within the existing water network. However, recent experience in Ashendon provides direct evidence of the consequences of allowing demand to approach or exceed the resilient capacity of rural utility infrastructure.

Tests of soundness: Justified and Effective.

11. Policies NE20, NE21 and environmental protection

Parish Council position: SUPPORT

Ashendon Parish Council welcomes the environmental safeguards within the Regulation 19 Plan.

Policy NE20 provides protection for landscape character and rural amenity, while Policy NE21 provides safeguards in relation to noise, pollution and impacts on neighbouring properties and the wider environment.

These provisions respond positively to concerns raised by the Parish Council at Regulation 18 regarding noise, light pollution and loss of rural tranquillity arising from growth at Westcott and elsewhere.

We support these policies and ask that they are applied fully to the direct and indirect effects of strategic development, including transport-related impacts on surrounding rural settlements.

Soundness position: Support.

12. Cumulative effects on Ashendon

A recurring concern throughout Ashendon Parish Council's representations is the cumulative rather than solely site-specific effect of development.

Ashendon is not proposed for significant strategic development itself. Nevertheless, it lies within a part of Buckinghamshire affected by growth at Westcott, Haddenham, Grendon Underwood and Waddesdon and by wider development and transport pressures elsewhere in the Vale.

It is therefore important that the absence of a development allocation within Ashendon is not interpreted as absence of an impact upon Ashendon.

The Parish Council considers cumulative traffic, traffic displacement, freight/HGV routing, construction traffic, interaction between employment and residential growth, road safety on routes without pavements, rural landscape/noise/tranquillity, utility resilience, and timely infrastructure delivery to require explicit consideration through implementation of the Local Plan.

13. Overall conclusion on soundness

Ashendon Parish Council does not consider the Local Plan as a whole to be unsound.

Indeed, we welcome a number of policies which respond positively to matters raised during Regulation 18, including SP2, HO10, TR1, TR5, IN1, IN3, NE20 and NE21.

Our objection is more focused. We consider Policy WES01 and its supporting transport evidence insufficiently justified and effective in their present form because they do not adequately demonstrate or control the cumulative effect of Westcott-related traffic, particularly freight and HGV movements, on the surrounding rural highway network.

This concern is reinforced rather than resolved by the Strategic Transport Assessment, which acknowledges that Local Plan traffic may divert onto small rural lanes, and by the identification of H310/J46 providing an improved outbound vehicular connection between Westcott Venture Park and Ashendon Road.

It is not sufficient to demonstrate that Westcott itself experiences only an insignificant increase in traffic delay if part of that outcome may be achieved by redistributing traffic onto less suitable roads elsewhere.

The Parish Council also considers that the June–July 2026 emergency water-supply incident provides important new evidence about infrastructure resilience. The Plan's water and infrastructure policies should ensure that planned growth does not exacerbate network weaknesses or create conditions in which prolonged emergency road-based intervention is necessary to maintain essential services.

The Parish Council therefore asks that the Plan be modified so that:

17. WES01 explicitly protects neighbouring rural settlements and unsuitable rural roads from unacceptable traffic displacement;
18. a site-wide cumulative Transport and Freight Management Strategy is required for Westcott;
19. TR1 expressly recognises rural-road suitability, vehicle composition and displaced traffic as matters for assessment;
20. TR5 is explicitly linked to strategic employment allocations and enforceable freight-routing measures;
21. necessary transport, freight and utility mitigation is delivered before development generating the impact;
22. IN3 expressly addresses water-network resilience and peak-demand capacity, and relevant evidence is updated where significant recent incidents demonstrate potential resilience constraints; and

23. H310/J46 is not relied upon as mitigation until its traffic, freight and rural-network consequences have been demonstrated and found acceptable.

With these modifications, Ashendon Parish Council considers that the Local Plan would provide a substantially more robust and effective framework for reconciling strategic growth with the legitimate need to protect small rural communities, their infrastructure and the highway network surrounding them.

14. Examination hearing

Ashendon Parish Council would wish to participate in any Examination hearing dealing with Westcott Venture Park, strategic transport, freight, infrastructure delivery or water-infrastructure resilience, should the Inspector consider oral participation helpful.

The Parish Council's concern involves the interaction between Policy WES01, Policies TR1/TR5, Policies IN1/IN3, the Strategic Transport Assessment and specific modelled mitigation H310/J46. We consider that the relationship between these documents and the consequences for the surrounding rural highway and utility networks may benefit from examination through discussion with the Council and its technical advisers.