

SEER GREEN PARISH COUNCIL

Representation on the Buckinghamshire Local Plan 2024–2045

Regulation 19 Consultation – July 2026

1. Introduction

Seer Green Parish Council welcomes the opportunity to respond to the Regulation 19 publication version of the Buckinghamshire Local Plan 2024–2045.

This representation is made **on behalf of Seer Green Parish Council**.

The Parish Council supports the preparation of a single, county-wide Local Plan for Buckinghamshire. We recognise the importance of having an up-to-date statutory development plan which provides a coherent framework for accommodating housing and employment needs, delivering infrastructure and protecting the county's natural, historic and built environment.

The Parish Council particularly supports the Plan's stated commitment to:

- sustainable and coordinated growth;
- infrastructure-led development;
- protection and enhancement of the natural environment;
- climate-change mitigation and resilience;
- biodiversity and nature recovery;
- high-quality design and placemaking;
- sustainable transport;
- protection of valued landscapes and in particular the strong protection of the Green Belt;
- healthy and inclusive communities; and
- a plan-led approach which provides greater certainty and reduces the risk of speculative development.

Seer Green is identified by Buckinghamshire Council as a **Tier 4 – Large Village**. The Settlement Review places Seer Green in the same broad category as other large villages, but the Parish Council considers that the assessment of its capacity to accommodate further development must take proper account of its particular infrastructure, transport, drainage, environmental and settlement-pattern constraints, in addition to the position of Seer Green within the Green Belt. The Settlement Review itself identifies Seer Green as a Tier 4 settlement.

Seer Green is a relatively small village of approximately 950 households. It is closely related geographically to Beaconsfield, Chalfont St Giles and Jordans but retains a distinct rural identity and settlement character. The surrounding countryside, Green Belt, woodland, hedgerows and agricultural land perform an important role in maintaining the physical separation between these settlements.

The Parish Council therefore supports the Local Plan's **strategic approach to planned growth**, whilst maintaining and protecting the Green Belt. Seer Green considers the Green Belt to be an essential component of the Plan's Spatial Strategy rather than simply one environmental consideration amongst many.

2. Regulation 19 – Legal Compliance and Soundness

The Parish Council understands that Regulation 19 representations should focus on whether the Plan has been prepared in accordance with the relevant legal requirements and whether it is sound.

The four soundness tests are:

1. **Positively prepared;**
2. **Justified;**
3. **Effective;** and
4. **Consistent with national policy.**

The Parish Council's principal position is that the overall strategy is capable of satisfying these tests, but that the Plan needs to ensure that its strategic policies and development-management policies are applied properly to locations such as Seer Green where there are demonstrable constraints on further development.

CHAPTER 1 – INTRODUCTION

Representation: Support

The Parish Council supports Chapter 1.

The Council's stated purpose for the Local Plan is particularly welcome. The Plan describes itself as providing a long-term strategy for managing growth to 2045 and explicitly identifies the need to balance development with protection of Buckinghamshire's distinctive character, environment and communities.

The Parish Council strongly supports this approach.

The Plan also states that growth is to be **sustainable, coordinated and infrastructure-led**, and that development should be aligned with transport, utilities, education, healthcare and green infrastructure.

This is highly relevant to Seer Green.

The Plan correctly states that site allocations do not override the wider development-management policies and that allocated development must still comply with requirements concerning infrastructure, drainage, biodiversity, landscape, green and blue infrastructure and design.

The Parish Council strongly supports this principle.

Seer Green-specific consideration

The Parish Council asks that the Council and the eventual Planning Inspector ensure that the evidence concerning Seer Green's infrastructure capacity is not treated as merely descriptive background evidence.

The Council's own Baseline Infrastructure Study records information supplied by Seer Green Parish Council concerning the village's approximately 950 households, limited bus service, ageing sewage infrastructure and reliance on neighbouring settlements for a number of services.

These are material considerations when assessing whether additional development in and around Seer Green would constitute sustainable development.

Requested modification / clarification

The Parish Council asks that the Plan make clear, either within Chapter 1 or through the relevant strategic policies, that:

Settlement hierarchy designation is not, by itself, an indication of development capacity. The scale and location of development must reflect the infrastructure, transport, drainage, environmental, landscape and settlement-character constraints of the individual settlement.

This would strengthen the Plan's effectiveness and ensure that its strategic principles are applied consistently.

CHAPTER 2 – NATIONAL AND STRATEGIC CONTEXT

Representation: Support

The Parish Council supports Chapter 2.

The Parish Council does not dispute the need for Buckinghamshire to plan positively for its identified housing requirement. The Parish Council also considers that an adopted Local Plan is preferable to a situation in which development is driven by speculative applications without a coherent spatial strategy.

The current Plan makes provision for approximately **91,287 homes against an identified need of approximately 91,230 homes** over the plan period.

However, meeting the county-wide housing requirement does not mean that every settlement has the same ability to accommodate additional development.

The Plan should therefore continue to distinguish between:

- the strategic need for housing across Buckinghamshire; and
- the appropriate location of individual developments.

This distinction is especially important for Seer Green in view of its location within the Green Belt.

CHAPTER 3 – SPATIAL PORTRAIT AND KEY ISSUES

Representation: Support, with particular emphasis on Green Belt and settlement identity.

The Parish Council supports Chapter 3 and its identification of the principal challenges facing Buckinghamshire.

However, we consider that the spatial portrait would be strengthened by greater recognition of the particular circumstances of villages such as Seer Green.

3.1 Settlement character

Seer Green has a distinctive rural settlement pattern.

The village's character is strongly influenced by:

- its relatively compact built form;
- surrounding agricultural land;
- Green Belt;
- woodland;
- mature hedgerows;
- its historic village core;
- its relationship with Jordans;

- its proximity to Beaconsfield and Chalfont St Giles; and
- the narrow rural roads and lanes connecting the settlements.

Buckinghamshire's Heritage Portal records the long history of Seer Green and identifies its surrounding agricultural land and areas of ancient woodland, including Hodgemoor Woods. It also records significant archaeological evidence within the parish and the historic development of the village around its green, church, school and later railway infrastructure.

The Parish Council considers that these characteristics are relevant to determining the capacity for further outward expansion.

3.2 Infrastructure

The Council's Baseline Infrastructure Study provides important evidence of local infrastructure constraints.

The Study records that:

- Seer Green has approximately 950 households;
- the village has a limited bus service;
- its sewage system is ageing and under severe strain;
- the village depends upon neighbouring settlements for a range of essential services;
- existing childcare and primary-school provision is adequate at present but may struggle with additional development; and
- the Parish's existing community facilities have finite capacity.

These matters should be given significant weight when considering future development.

3.3 Flooding and drainage

The Parish Council considers flooding and drainage to be among the most important local constraints.

The Council has direct local experience of repeated surface-water flooding in the vicinity of Highland Road, Howard Crescent, Bottom Lane, Longbottom Lane and Chalfont Road.

The Parish Council's 2026 site-engagement representation records that heavy clay soils and poor drainage contribute to flooding affecting gardens, roads and the wider highway network. It also records flooding affecting Chalfont Road and the need for continuing drainage maintenance.

The Parish Council considers that this local evidence should be explicitly recognised when applying the Plan's flood-risk and sustainable-drainage policies.

3.4 Settlement separation

The countryside around Seer Green also performs an important strategic function.

Development to the north-west, west and south of the village has the potential to reduce the physical separation between:

- Seer Green;
- Beaconsfield;
- Chalfont St Giles; and
- Jordans.

The Parish Council considers the prevention of settlement coalescence to be a legitimate and important planning objective.

The objective is not to prevent all development, but to ensure that the cumulative effect of individual developments does not gradually destroy the separate identity of neighbouring settlements. The Parish Council therefore considers that settlement separation must be regarded as a strategic Green Belt function

CHAPTER 4 – VISION AND STRATEGIC OBJECTIVES

Representation: Strong Support

The Parish Council strongly supports Chapter 4 and that Objective 1 to be fundamental to the integrity of the Local Plan.

The objectives concerning:

- the natural and built environment;
- landscape and countryside;
- housing;
- heritage
- health and wellbeing;
- infrastructure;
- employment;
- transport and connectivity
- Green Belt and distinctive character

are all appropriate.

However, the Parish Council considers that the objectives should be applied collectively.

For Seer Green, the relevant planning question must be whether the development:

- is genuinely sustainable;
- can be served by appropriate infrastructure;
- can be accessed safely;
- will not worsen existing flooding;
- can be served by adequate foul drainage;
- can be integrated into the village;
- will protect biodiversity;
- will maintain settlement separation;
- will protect landscape character; and
- will preserve the distinctive identity of Seer Green.

This is consistent with the Plan's own objective of creating high-quality, healthy and sustainable places.

The Parish Council therefore supports the objectives but asks that the Council ensure that **infrastructure capacity and local environmental constraints are treated as determinants of development capacity, rather than simply mitigation matters to be considered after the principle of development has been established.**

CHAPTER 5 – SPATIAL STRATEGY AND STRATEGIC POLICIES

SP1 – Presumption in Favour of Sustainable Development

Representation: Support, with an important Seer Green qualification

The Parish Council supports the principle of sustainable development.

However, the Parish Council considers it essential that SP1 is not interpreted as creating a presumption that development is sustainable merely because a settlement is identified within the settlement hierarchy.

Seer Green's position as a Tier 4 settlement does not remove the need to demonstrate:

- appropriate access;
- sufficient infrastructure;
- adequate drainage;
- appropriate transport arrangements;

- protection of biodiversity;
- protection of landscape;
- protection of settlement character; and
- compliance with all other policies of the Plan.

The Parish Council therefore supports SP1 but asks that the policy and supporting text explicitly reinforce this point.

SP2 – Housing Strategy

Representation: Support

The Parish Council supports SP2 in principle.

We recognise the substantial housing requirement facing Buckinghamshire and support the principle of distributing growth through a strategic spatial strategy rather than allowing speculative development to determine where growth occurs.

The Parish Council particularly supports:

- use of existing urban capacity;
- brownfield development where appropriate;
- strategic development in locations capable of supporting sustainable communities;
- appropriate expansion of existing settlements; and
- infrastructure-led development.

However, the Parish Council asks that SP2 be applied in accordance with settlement capacity.

The Parish Council asks that this position is retained through examination and adoption.

Section 5.21 – Green Belt

The Parish Council gives strong support to Section 5.21 and the Plan's strategic approach to the Green Belt.

The Parish Council supports the Plan's recognition that Green Belt policy has a strategic role in determining the pattern and location of growth.

The Green Belt is integral to maintaining:

- The openness of the countryside;
- The separate identity of Seer Green;

- the separation between Seer Green, Beaconsfield, Chalfont St Giles and Jordans;
- The rural setting of the village; and
- The wider landscape framework.

The Parish Council strongly supports the principle that the Plan should seek to meet development needs without unnecessary Green Belt release. Where development can reasonably be accommodated outside the Green Belt, that option should be preferred. The Green Belt should not be considered to be a strategic land bank which can be drawn upon whenever housing delivery becomes challenging and the exceptional circumstances test should remain meaningful.

SP3 – Gypsy, Traveller and Travelling Showpeople Provision

Representation: Support

The Parish Council supports the Plan's evidence-led approach to meeting the accommodation needs of Gypsies, Travellers and Travelling Showpeople.

SP4 – Strategy for Economic Growth

Representation: Support

The Parish Council supports SP4.

The provision of employment land is important to Buckinghamshire's economic future and to reducing unnecessary commuting.

SP5 and SP6 – Retail, Leisure and Town Centre Regeneration

Representation: Support

The Parish Council supports SP5 and SP6.

A strong hierarchy of town and local centres is important to sustainable development.

SP7, SP8 and SP9 – Town Centre Policies

Representation: Support

The Parish Council supports the town-centre strategies for Aylesbury, High Wycombe and Chesham.

SP10 – Infrastructure for Transport, Telecommunications, Utilities and Waste

Representation: Strong Support

The Parish Council strongly supports SP10.

The Plan states that development should be supported by necessary infrastructure. The Parish Council considers that this should be a genuine requirement rather than an aspiration.

The Parish Council considers that development should not proceed where infrastructure deficiencies cannot be satisfactorily resolved.

SP11 – Energy Efficiency and Natural Resources

Representation: Support

The Parish Council supports SP11.

The village's rural surroundings, biodiversity and landscape make the protection of natural resources particularly important.

SP12 – Community Facilities and Local Services

Representation: Strong Support

The Parish Council strongly supports SP12.

The policy is directly relevant to Seer Green because the village has a limited range of local services and relies upon surrounding settlements for many essential facilities.

Development that materially increases population should make an appropriate contribution towards the facilities necessary to support the resulting community.

The Parish Council also asks that the Plan recognise the cumulative effect of development on small villages where existing facilities may appear adequate when considered in isolation but have limited spare capacity.

SP13 – Natural Environment and Climate Resilience

Representation: Strong Support

The Parish Council strongly supports SP13.

The policy's emphasis on environmental protection and climate resilience is particularly relevant to Seer Green because of the combination of:

- Green Belt;
- agricultural land;
- woodland;
- hedgerows;
- biodiversity;
- surface-water drainage issues; and
- proximity to internationally and nationally important environmental assets.

The Parish Council considers that protection of the existing green infrastructure network should be regarded as part of the infrastructure necessary to support sustainable communities.

SP14 – Built Environment, Placemaking and Design

Representation: Strong Support

The Parish Council strongly supports SP14. However, high-quality design cannot compensate for inappropriate location. A well-designed development can still be inappropriate if it results in unacceptable Green Belt harm, settlement coalescence or loss of landscape character.

The Council's heritage evidence demonstrates that Seer Green has a distinctive historical evolution, including its historic village core, Arts and Crafts-influenced development and relationship with the surrounding countryside.

The Parish Council therefore supports the plan's design policies but considers location and Green Belt considerations to be fundamental

SP15 – Conservation and Enhancement of Heritage Assets

Representation: Support

The Parish Council supports SP15.

The historic character of Seer Green and its surrounding archaeological and landscape context should be properly considered in assessing development proposals.

The Buckinghamshire Heritage Portal records archaeological evidence including prehistoric finds, the Roman route through Hodgemoor Woods, medieval landscape features and the historic development of the village.

The Parish Council therefore supports a precautionary approach to development which could affect heritage assets or their settings.

SP16 – Healthy Communities and Tackling Health Inequalities

Representation: Support

The Parish Council supports SP16.

Health should be considered in its broadest sense.

In Seer Green, sustainable development should provide:

- safe walking routes;
- safe cycling opportunities;
- access to green space;
- community facilities;
- appropriate recreational provision;

- access to services; and
- a healthy environment free from unacceptable flooding, pollution and traffic impacts.

The absence of certain services within the village also means that transport accessibility is directly relevant to health and wellbeing.

CHAPTER 6 – SITE ALLOCATIONS

Representation: Strong Support for the overall allocation strategy and for retaining Seer Green’s identified sites outside the allocation strategy

The Parish Council supports the principle of allocating development through the Local Plan.

A defined allocation strategy provides considerably greater certainty than speculative development.

The Regulation 19 Chapter 6 identifies the strategic and housing allocations throughout Buckinghamshire. The published list does **not identify a major housing allocation in Seer Green**.

The Parish Council considers this to be an appropriate outcome.

The Council should retain this position because the absence of a major allocation at Seer Green is consistent with the settlement’s infrastructure and environmental constraints.

6.1 OPUS 3691 – Land North of Highland Road, Seer Green

The Parish Council strongly supports the site’s continued exclusion from the Local Plan.

The Parish Council’s 2026 site-engagement response records that the site was assessed as unsuitable because it is within the Green Belt.

In addition, the Parish Council has direct local knowledge of:

- lack of existing road access;
- the requirement for access through Highland Road;
- flooding following heavy rainfall;
- heavy clay soils and poor drainage;
- surface-water runoff affecting Bottom Lane and Longbottom Lane;
- potential traffic impacts on a residential cul-de-sac; and
- ecological and landscape impacts.

These factors reinforce the site's unsuitability for allocation.

The site is greenfield and its development would extend the built-up area into the countryside.

The Parish Council therefore supports its exclusion.

6.2 OPUS 3412 – Land North West of Chalfont Road, Seer Green

The Parish Council strongly supports the continued exclusion of this site from the Local Plan.

The Parish Council's site-engagement response records that the site was assessed as unsuitable because of its Green Belt location.

The Parish Council further considers that development would:

- extend the settlement north-westwards;
- weaken the rural setting of Seer Green;
- move the built form closer to Chalfont St Giles;
- increase pressure on Chalfont Road;
- affect existing drainage patterns;
- result in the loss of established hedgerow habitat; and
- contribute to settlement coalescence.

The Parish Council considers that these impacts are inconsistent with the strategic objectives of the Local Plan.

6.3 OPUS 3335 – Land West of Chalfont Road, Seer Green

The Parish Council also supports the continued exclusion of OPUS 3335.

The Parish Council's previous site-engagement response records the site's Green Belt status and its relationship with the Local Nature Recovery Strategy.

The site forms part of the landscape and ecological setting of Seer Green.

Development would risk:

- loss of hedgerow;

- fragmentation of habitat;
- increased surface-water runoff;
- landscape harm;
- loss of openness; and
- further outward expansion of the village.

The Parish Council considers that biodiversity net gain should not be treated as an automatic justification for development where development itself would cause the loss of established ecological networks and landscape features.

6.4 OPUS 1096 – Oldefields Equestrian Centre, Chalfont Road

The Parish Council supports the continued exclusion of this site.

Although previously developed in character, the site is within the Green Belt and the Parish Council agrees with its assessment as unsuitable because of its relationship with the settlement pattern and countryside.

The site should not be regarded as a justification for further outward expansion of Seer Green.

6.5 OPUS 3653 – Land South of Longbottom Lane / East of Dean Wood Road

The Parish Council considers OPUS 3653 to be of particular strategic importance despite its location outside the civil parish of Seer Green.

The site lies within Chalfont St Giles Parish, but its development would have direct implications for Seer Green.

The Parish Council's 2026 site-engagement response identifies the site as provisional Grey Belt requiring further assessment.

The Parish Council considers that the assessment must take account of **cumulative impacts**, including the relationship with other sites around the Beaconsfield/Seer Green/Chalfont St Giles area.

Development in this location could contribute to:

- further erosion of the separation between settlements;
- landscape and ecological harm;
- increased traffic;
- pressure on local infrastructure;
- loss of the rural setting of Seer Green; and
- a perception that Seer Green is becoming an extension or suburb of Beaconsfield.

The Parish Council therefore asks that any further consideration of OPUS 3653 explicitly assesses its effects on Seer Green, not simply its effects within the administrative boundary of Chalfont St Giles.

6.6 Cumulative development around Seer Green

The Parish Council considers this issue sufficiently important to warrant a specific modification to the Plan's approach.

Individual sites may appear capable of being mitigated when considered separately.

However, the cumulative effect of development around Seer Green could be substantially greater.

The Plan should therefore require consideration of cumulative impacts upon:

- settlement separation;
- traffic;
- drainage;
- foul sewer capacity;
- education;
- healthcare;
- public transport;
- biodiversity;
- landscape;
- green infrastructure; and
- community facilities.

The Parish Council asks that this principle be made explicit in the Plan or supporting implementation framework.

CHAPTER 7 – DEVELOPMENT MANAGEMENT POLICIES

HO1 – Housing Mix

Representation: Support

The Parish Council supports HO1.

New housing should respond to identified local and county-wide needs and should contribute to balanced communities.

HO2 – Affordable Housing

Representation: Support

The Parish Council supports HO2.

Affordable housing is an important component of meeting local housing need.

However, affordable housing requirements should not be regarded as a reason to permit development on otherwise unsuitable sites.

HO3 – Development Viability Review

Representation: Support

The Parish Council supports the principle of viability review.

HO4 – Accessible Housing

Representation: Support

The Parish Council supports HO4.

HO5 – Self and Custom Build Housing

Representation: Support

The Parish Council supports HO5.

HO6 – Houses in Multiple Occupation

Representation: Support

The Parish Council supports HO6.

HO7 – Gypsy, Traveller and Travelling Showpeople Accommodation

Representation: Support in principle

The Parish Council supports an evidence-led approach to meeting identified accommodation needs.

HO8 – Specialist Housing

Representation: Support

The Parish Council supports HO8.

HO9 – Rural Exception Sites

Representation: Support, subject to local constraints

The Parish Council supports the principle of rural exception sites where genuinely appropriate.

However, rural exception development should not become a mechanism for incremental erosion of the countryside around Seer Green.

The same tests relating to infrastructure, transport, drainage, landscape, biodiversity and settlement character should apply.

HO10 – Windfall Policy

Representation: Support, with a Seer Green qualification

The Parish Council supports the principle that appropriate windfall development can contribute to housing delivery.

However, windfall development should not result in the cumulative growth of a village beyond the capacity identified through the Plan.

This is particularly important for Seer Green.

The Parish Council asks that windfall applications in and around Seer Green be assessed cumulatively, rather than each being treated as an isolated proposal.

HO11 – Residential Annexes

Representation: Support

No objection.

ECONOMIC POLICIES EC1–EC10

Representation: Support

The Parish Council broadly supports the economic policies.

A successful economy is essential to Buckinghamshire's sustainability.

However, major employment development should be directed towards locations with appropriate transport and infrastructure capacity.

NE1 – Water Quality

Representation: Strong Support

The Parish Council strongly supports NE1.

Water quality is particularly important given the known local drainage and sewerage problems in Seer Green.

The Parish Council considers that development should not worsen existing water-quality or drainage problems.

NE2 – Watercourses and Associated Corridors

Representation: Strong Support

The Parish Council supports NE2.

Watercourses, drainage corridors and natural surface-water routes should be protected.

NE4 and NE5 – Biodiversity and Species Protection

Representation: Strong Support

The Parish Council strongly supports these policies.

The hedgerows and ecological corridors surrounding Seer Green should be treated as important components of the local ecological network.

The Parish Council's site-engagement response specifically identified the potential loss of ancient hedgerows and associated wildlife habitat as a concern in relation to sites around Chalfont Road.

NE6 – Biodiversity Gain and Nature Recovery

Representation: Strong Support

The Parish Council strongly supports NE6.

However, biodiversity net gain should not be interpreted as making development acceptable where irreplaceable or highly valuable existing habitat would be destroyed.

The objective should be to protect and enhance existing ecological networks in the first instance.

NE7 – Green Infrastructure

Representation: Strong Support

The Parish Council strongly supports NE7.

For Seer Green, green infrastructure performs multiple functions:

- biodiversity;
- landscape;
- recreation;
- climate resilience;
- surface-water management;
- carbon storage;
- visual separation of settlements; and
- maintenance of rural character.

The Parish Council considers these functions to be interconnected.

NE8 – Existing Green Space

Representation: Support

The Parish Council supports NE8.

Existing green spaces within Seer Green are important community assets and contribute materially to the village's character and wellbeing.

NE9 – Trees, Ancient and Veteran Trees and Woodland

Representation: Strong Support

The Parish Council strongly supports NE9.

This is particularly important given the woodland and mature hedgerows around Seer Green and the wider Hodgemoor Woods area.

NE10 – Ecological Enhancements

Representation: Support

The Parish Council supports NE10.

NE11–NE15 – Protected Landscapes, SACs, SANG and Gateway Sites

Representation: Strong Support

The Parish Council supports these policies.

Particular care should be taken in the assessment of development in the wider area around Seer Green because of the proximity of environmentally sensitive sites, including Hodgemoor Woods (SSSI) and Burnham Beeches.

The Council's Regulation 19 evidence base includes a specific Habitats Regulations Assessment and an Interim Burnham Beeches SAC Mitigation Strategy.

The Parish Council supports the principle that development likely to affect protected sites must be properly assessed and mitigated.

NE16 – Protection of the Green Belt

Representation: Strong Support

The Parish Council strongly supports NE16.

The Green Belt around Seer Green performs important functions beyond simply restricting development.

It:

- prevents settlement coalescence;
- preserves openness;
- protects the countryside;
- maintains the setting of Seer Green;
- helps preserve the distinction between neighbouring settlements; and
- provides landscape and ecological value.

The Green Belt therefore has multiple overlapping planning functions and its importance should not be reduced to a simple calculation of whether an individual parcel makes a contribution to one particular Green Belt purpose. Nor should it be viewed solely through a site-by-site lens and its cumulative spatial function should be considered.

Green Belt and Landscape

The Parish council believes that the protection of the Green Belt also contributes to the protection of the landscape and that the landscape surrounding Seer Green is integral to the character of the settlement. It therefore follows that the transition between village and countryside is an important part of the village's identity and the development of Green Belt land would therefore have consequences extending beyond the development site itself.

Green Belt and Biodiversity

The Parish Council supports the relationship between NE16 and the Plan's biodiversity policies

Green Belt land around Seer Green contains:

- hedgerows;
- mature trees
- agricultural habitats;
- woodland;
- ecological corridors; and
- green infrastructure

Protecting these areas in situ is preferable to attempting to recreate ecological value elsewhere following development.

Green Belt and Climate Resilience

Green Belt protection has an important role to play in climate resilience.

Undeveloped land can:

- absorb rainfall;
- reduce surface water runoff;
- provide vegetation and carbon storage;
- support biodiversity; and
- provide opportunities for natural flood management.

This is relevant to Seer Green because of the Parish's known surface water drainage problems

Exceptional Circumstances

The Parish Council strongly supports the principle that Green Belt boundaries should only be altered where the necessary exceptional circumstances are fully demonstrated. We therefore do not consider the general need for additional housing to automatically constitute exceptional circumstances for releasing proposed Green Belt sites.

The Parish Council therefore strongly supports retaining and protecting the Green Belt

No weakening of NE16

The Parish Council asks the Planning Inspector to ensure that Policy NE16 is not weakened during examination in response to speculative arguments that Green Belt land should be released merely to increase housing flexibility.

Any such change would undermine the Plan's own Local Plan Objective 1, Spatial Strategy, Green Belt Strategy, Environmental Objectives and Commitment to sustainable development.

The Parish Council therefore strongly supports the retention of NE16 as a robust Green Belt protection policy.

NE18 – Development in the Countryside Outside the Green Belt

Representation: Support

The Parish Council supports NE18.

It is particularly important that land outside the Green Belt is not automatically treated as suitable for development.

Countryside value, landscape character, biodiversity, settlement pattern and infrastructure must remain material considerations.

NE19 – National Landscapes and Their Setting

Representation: Support

The Parish Council supports NE19.

NE20 – Landscape Character and Visual Amenity

Representation: Strong Support

The Parish Council strongly supports NE20.

The landscape surrounding Seer Green contributes directly to the village's identity.

The Parish Council considers that development on the village edges should be assessed for its effect on the wider landscape rather than only the immediate development site.

NE21 – Pollution, Air Quality and Contaminated Land

Representation: Support

The Parish Council supports NE21.

NE22 – Light Impacts

Representation: Support

The Parish Council supports NE22.

Lighting can have disproportionate effects on rural character and wildlife corridors.

TR1 – Transport Requirements for New Development

Representation: Strong Support

The Parish Council strongly supports TR1.

This policy is critical to Seer Green.

The Parish Council considers that the sustainability of development should not be determined solely by proximity to a bus route or train station.

A development can be geographically close to a bus route or train station while still generating substantial car dependence if residents need to travel to neighbouring towns for:

- secondary education;
- healthcare;
- pharmacies;
- employment;
- larger-scale retail;
- leisure; and
- other services.

The Parish Council's previous Local Plan representation identified this issue and noted the village's reliance on private cars because of the limited range of services within the village.

The Parish Council therefore supports a realistic assessment of actual travel patterns.

TR2 – Transport Improvements

Representation: Support

Where development is permitted, appropriate transport improvements should be delivered before or alongside the development that generates the need.

TR3 – Parking Standards

Representation: Support

The Parish Council supports appropriate parking provision.

Reduced parking provision should not simply transfer parking pressure onto existing residential streets in villages such as Seer Green where alternative transport options are limited.

TR4 – Public Rights of Way

Representation: Strong Support

The Parish Council supports TR4.

Existing footpaths and public rights of way should be protected and enhanced.

IN1 – Infrastructure Delivery

Representation: Strong Support

The Parish Council strongly supports IN1.

The Parish Council considers that this should be one of the central tests applied to development around Seer Green.

Where infrastructure is already demonstrably under pressure, development should not proceed until the necessary capacity and mitigation are secured.

IN2 – Healthcare and Education Infrastructure

Representation: Strong Support

The Parish Council strongly supports IN2.

The Council's evidence identifies local dependence upon neighbouring settlements and potential pressure upon existing education and community infrastructure.

Development contributions should reflect the actual cumulative impact of development.

IN3 – Water Infrastructure

Representation: Very Strong Support

The Parish Council strongly supports IN3.

This policy is particularly important in Seer Green because the Parish Council has direct evidence of the condition and capacity of the existing sewerage system.

The Baseline Infrastructure Study records the Parish Council's concerns about the age and condition of the village sewage infrastructure and an incident involving raw sewage.

The Parish Council therefore considers that water and foul-drainage capacity should be demonstrated **before development is approved**, not left to be resolved retrospectively.

BE1 – Space Standards

Representation: Support

No objection.

BE2 – Conservation Areas

Representation: Support

No objection.

BE3 – Heritage Assets

Representation: Strong Support

The Parish Council supports BE3.

The historic environment of Seer Green contributes materially to the village's character and should be taken into account in assessing development.

BE4 – Residential Amenity

Representation: Support

No objection.

BE5 – Design of Developments

Representation: Strong Support

The Parish Council strongly supports BE5.

Development around Seer Green should respect:

- local building form;
- settlement scale;
- landscape setting;
- existing vegetation;
- historic character;
- street pattern;
- views;
- topography; and
- the relationship between built form and countryside.

The Parish Council supports the use of the Buckinghamshire Design Code but considers that local character must remain central to design assessment.

SE1 – Health Impact Assessment

Representation: Strong Support

The Parish Council supports SE1.

Health impacts should include the effects of:

- traffic;
 - air quality;
 - flooding;
 - loss of green space;
 - access to services;
 - walking and cycling;
 - recreation; and
 - community infrastructure.
-

SE4 – Community Facilities, Infrastructure and Assets of Community Value

Representation: Strong Support

The Parish Council strongly supports SE4.

The limited capacity of community facilities in a village such as Seer Green should be properly reflected in development assessments.

SE5 – Sport, Leisure and Recreation

Representation: Support

The Parish Council supports SE5.

Existing recreational facilities should be protected and appropriate additional provision secured where development increases demand.

CC1 – Flood Risk

Representation: VERY STRONG SUPPORT

The Parish Council considers CC1 to be of exceptional importance to Seer Green.

The Parish Council has direct experience of significant surface-water flooding.

The problem is not merely theoretical or limited to flood-zone mapping.

Local flooding has affected:

- gardens;
- roads;
- Bottom Lane;
- Longbottom Lane;
- Chalfont Road; and
- surrounding residential areas.

The Parish Council's published site-engagement response records repeated flooding after heavy rainfall and the contribution of heavy clay soils and poor drainage.

The Parish Council therefore considers that the Plan should adopt a **precautionary and locally informed approach** to development in areas where there is known surface-water flooding.

Requested modification

The Parish Council asks that CC1 make clear that:

Evidence of recurrent localised surface-water flooding, including evidence supplied by Parish and Town Councils, should be given appropriate weight even where the affected land is not identified as being within a high-probability flood zone on strategic mapping.

This is necessary because strategic mapping cannot necessarily capture all local drainage failures and overland-flow routes.

CC2 – Sustainable Drainage Systems

Representation: VERY STRONG SUPPORT

The Parish Council strongly supports CC2.

However, SuDS should not be regarded as a universal solution to development in areas already experiencing drainage problems.

The critical issue is whether the receiving drainage system has sufficient capacity.

The Parish Council therefore requests that development affecting Seer Green demonstrate:

1. no increase in peak surface-water discharge;
2. no increase in flood risk to existing properties;
3. adequate long-term maintenance arrangements;
4. consideration of cumulative drainage impacts; and
5. appropriate groundwater and soil conditions.

The Parish Council also asks that drainage proposals take account of the actual local experience of residents and the Parish Council.

CC3 – Water Efficiency Standards

Representation: Strong Support

The Parish Council supports CC3.

Water efficiency is particularly important where existing water and sewerage infrastructure is under pressure.

OVERALL SEER GREEN SITE AND SETTLEMENT POSITION

The Parish Council wishes to make its position on development around Seer Green particularly clear.

The Parish Council:

Supports

- the preparation of a single Buckinghamshire Local Plan;
- the plan-led approach to growth;

- meeting Buckinghamshire’s identified housing need;
- the protection of the Green Belt;
- infrastructure-led development;
- protection of biodiversity and green infrastructure;
- sustainable transport;
- high-quality design;
- protection of landscape and heritage;
- effective flood-risk management;
- protection of water resources and infrastructure;
- the Plan’s county-wide spatial strategy; and
- the absence of major housing allocations within Seer Green in the Regulation 19 Plan.

Supports the continued exclusion of

- **OPUS 3691 – Land North of Highland Road;**
- **OPUS 3412 – Land North West of Chalfont Road;**
- **OPUS 3335 – Land West of Chalfont Road;** and
- **OPUS 1096 – Oldefields Equestrian Centre.**

Requests particularly careful further assessment of

- **OPUS 3653 – Land South of Longbottom Lane / East of Dean Wood Road,** because although outside Seer Green Parish, its development could have significant cumulative effects upon Seer Green, its landscape setting, infrastructure, traffic and settlement identity.

KEY MODIFICATIONS REQUESTED

To ensure that the Plan is sound, the Parish Council respectfully asks Buckinghamshire Council and the Planning Inspector to ensure that the following matters are explicitly addressed.

Modification 1 – Settlement capacity

The Plan should clarify that settlement hierarchy does not equate to development capacity.

The capacity of a settlement must reflect its infrastructure, environmental, transport, landscape and drainage constraints.

Modification 2 – Cumulative impacts

The Plan should require cumulative impacts of development around settlement boundaries to be assessed, including development outside the administrative boundary of the settlement or parish where there are material effects on the settlement.

Modification 3 – Local drainage evidence

The Plan should recognise evidence of recurrent local surface-water flooding supplied by Parish Councils and local communities, even where strategic flood maps do not fully capture the problem.

Modification 4 – Foul drainage

Development should not be permitted where adequate foul-water capacity cannot be demonstrated.

Where infrastructure is already known to be under strain, development should be appropriately phased with infrastructure improvement.

Modification 5 – Green Belt and settlement separation

The Plan should recognise the role of Green Belt land around Seer Green in maintaining the separate identities of Seer Green, Beaconsfield, Chalfont St Giles and Jordans.

Modification 6 – Ecological networks

Development should protect existing hedgerows, woodland, mature trees and ecological corridors as a priority, rather than relying solely upon biodiversity net gain to compensate for their loss.

Modification 7 – Transport sustainability

Transport sustainability should be assessed on actual accessibility to essential services, not simply on proximity to a bus route.

CONCLUSION

Seer Green Parish Council supports the preparation and adoption of the Buckinghamshire Local Plan.

The Parish Council considers that a single county-wide Local Plan is essential to ensure that Buckinghamshire's significant housing and employment needs are accommodated through a coherent, plan-led and sustainable strategy.

The Parish Council does not seek to prevent necessary growth across Buckinghamshire.

Rather, the Parish Council seeks to ensure that growth is located where it can be accommodated sustainably and that the particular constraints of individual communities are properly recognised.

The Parish Council considers that the Regulation 19 Plan's overall strategy is capable of providing a sound basis for managing growth, and we support the Council's decision not to allocate the identified Seer Green Green Belt sites for major development.

We ask, however, that the Inspector ensure that the Plan's strategic policies are sufficiently robust to prevent future development pressures from undermining the very principles upon which the Plan is based.

In particular, the Plan should ensure that:

development follows infrastructure, rather than infrastructure being expected to follow development;

and that:

the designation of a settlement within the settlement hierarchy does not in itself establish that the settlement has capacity for further substantial growth.

The Parish Council considers that these modifications would strengthen the Plan's compliance with the tests of being **positively prepared, justified, effective and consistent with national planning policy**, while ensuring that the Plan provides an appropriate and sustainable framework for the future of Seer Green and Buckinghamshire as a whole.

Submitted on behalf of Seer Green Parish Council.