



Buckinghamshire Council  
The Gateway  
Gatehouse Road  
Aylesbury  
Buckinghamshire  
HP19 8FF

**September 2026**

Dear Sir/Madam,

## **Berryfields Parish Council - Regulation 19 Representation**

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**Re: Policy AYL06 - Land to the North of Martin Dalby Way, Aylesbury; NESS003 - Aylesbury; and associated growth affecting North Aylesbury**

Berryfields Parish Council wishes to formally maintain and update the objections it raised during the earlier Local Plan engagement in March 2026.

Having considered the Regulation 19 Draft Local Plan, the Parish Council remains seriously concerned about the proposed scale and location of development to the north of Aylesbury and, in particular, Policy AYL06 - Land to the North of Martin Dalby Way.

Policy AYL06 proposes an assumed 3,150 homes immediately north of Martin Dalby Way. The wider strategic growth proposed through NESS003 represents a very substantial further expansion of Aylesbury.

The Parish Council does not consider that the Regulation 19 Plan has adequately resolved the concerns previously raised regarding landscape impact, previous planning decisions, infrastructure capacity, transport, drainage and the cumulative impact of continued large-scale expansion in this part of Aylesbury.

For the reasons set out below, Berryfields Parish Council considers that the proposed strategy and allocations are not adequately justified or demonstrated to be effective and deliverable.

### **Previous Planning Decisions and Evidence Base**

The Parish Council remains particularly concerned that previous planning decisions affecting this area have not been afforded sufficient weight.

Part of the area has previously been considered through a major planning appeal:

Town and Country Planning Act 1990 - Section 78  
Appeal by Hallam Land Management Ltd  
Land East of A413 Buckingham Road and Watermead  
Application Ref: 13/03534/AOP

In refusing planning permission, the Secretary of State identified significant adverse effects including:

- harm to landscape character;
- loss of historic strip fields and ridge-and-furrow landscape features;
- urbanisation of the rural approach to Aylesbury;
- narrowing of the open gap between Aylesbury, Berton and surrounding communities; and



- permanent loss of Best and Most Versatile agricultural land, including Grade 2 land.

The Secretary of State concluded that the harm significantly and demonstrably outweighed the benefits and that the proposal did not represent sustainable development.

Development affecting land north of Martin Dalby Way has also previously been considered in the Secretary of State's decisions concerning Fleet Marston Farm, Hampden Fields and Land North of Weedon Hill.

Those findings identified significant harm to landscape character and appearance, development extending beyond the defensible settlement boundary, intrusion into open countryside and built development extending towards the ridgeline.

These are important material considerations.

The Regulation 19 Plan itself acknowledges that the AYL06 site occupies an elevated and open position, forms part of the open countryside separating Aylesbury from surrounding rural settlements and has extensive views from the surrounding area.

The Parish Council therefore remains concerned that the justification for allocating development of this magnitude in precisely the landscape previously found to be sensitive has not been adequately demonstrated.

The Parish Council considers that the evidence base should clearly demonstrate what has materially changed since these previous assessments and decisions, and how the harms previously identified have either been overcome or can now be satisfactorily mitigated. The allocation of the land through the Local Plan does not in itself address the substantive planning concerns previously identified.

### **Landscape Sensitivity, Weedon Ridge and Settlement Coalescence**

Berryfields Parish Council remains particularly concerned about the effect of development on the Weedon Ridge and the northern landscape setting of Aylesbury.

The land north of Martin Dalby Way provides an important transition between the existing built form of Aylesbury and open countryside.

Development of approximately 3,150 homes at AYL06 would represent a major outward expansion of the urban edge.

Although the policy requires a landscape-led approach and green infrastructure, landscaping and mitigation cannot in themselves replicate the function and character of existing open countryside or remove the fundamental landscape change resulting from development of this scale.

The cumulative impact of development across northern Aylesbury must also be considered.

Berryfields has already accommodated substantial housing growth as part of Aylesbury's previous expansion. Further strategic growth immediately adjoining Berryfields, Buckingham Park, Watermead and Bierton risks progressively reducing the separation between existing communities and creating a substantially enlarged continuous urban area.

The Parish Council does not consider that this cumulative effect has been sufficiently addressed.



### **Scale of Development and Infrastructure-Led Growth**

The Regulation 19 Plan describes its approach as sustainable and infrastructure-led.

The Parish Council supports the principle that new housing must be accompanied by the infrastructure necessary to support the resulting population. However, we remain concerned that the infrastructure proposed for AYL06 and the wider northern Aylesbury growth does not provide sufficient certainty that essential services will be available when required.

The issue is not simply whether financial contributions can subsequently be secured from developers. For development of this magnitude, the Plan should demonstrate what infrastructure will be required, where it will be provided, how it will be funded and, importantly, when it will be delivered in relation to occupation of the new homes.

### **Education - Secondary School Provision**

Policy AYL06 identifies provision for a 3FE primary school, but the Parish Council is particularly concerned about the absence of clearly identified secondary-school provision associated with approximately 3,150 additional homes.

Existing and committed development across Berryfields and the wider Aylesbury area has already generated substantial demand for school places.

A further development of this scale will generate significant additional numbers of secondary-age pupils.

The Parish Council considers that the Plan should demonstrate where the necessary secondary-school capacity will be provided, the evidence that sufficient capacity will exist and the mechanism and timetable by which any additional provision will be delivered.

Reliance upon future contributions or capacity elsewhere, without a clearly identified and deliverable solution, risks housing being occupied before the necessary education infrastructure is available.

### **Healthcare and Hospital Capacity**

The Parish Council welcomes the recognition within AYL06 that additional healthcare provision will be required. However, the policy currently provides for a financial contribution towards or delivery of a healthcare facility.

This does not in itself address the wider impact of substantial population growth upon GP, community, ambulance and acute hospital services.

Berryfields Parish Council therefore considers that the Plan should demonstrate how the cumulative population growth proposed for Aylesbury will be accommodated by healthcare infrastructure, including the implications for hospital capacity.

The issue is particularly important because healthcare demand will arise as homes are occupied. Necessary healthcare capacity and delivery mechanisms should therefore be established and appropriately phased alongside development rather than addressed retrospectively.



### **Cemetery and Burial Provision**

The Parish Council is also concerned about the absence of clearly identified cemetery and burial provision associated with the scale of population growth proposed.

Cemetery and burial provision is an essential element of community infrastructure and should be planned alongside housing, education, healthcare and other community facilities.

The Local Plan should demonstrate that sufficient burial capacity exists to accommodate the substantial increase in population over the Plan period or identify where and how additional provision will be delivered.

For development on the scale now proposed for northern Aylesbury, this should not be left solely for consideration at a later planning-application stage.

### **Transport and Highway Capacity**

The Parish Council's previous concerns regarding transport remain.

The A413, A418 and local roads serving Berryfields and northern Aylesbury already experience significant congestion, particularly during peak periods.

Policy AYL06 proposes approximately 3,150 homes immediately north of Martin Dalby Way. Even with improved walking, cycling and bus provision, development of this scale will inevitably generate significant additional movements.

The policy refers to off-site highway mitigation and assessment, an internal route, bus access and traffic-calming measures. However, the Parish Council remains concerned that the Plan does not provide sufficient certainty regarding the strategic highway improvements necessary to accommodate the cumulative scale of growth.

The Parish Council is particularly concerned about the effect upon Martin Dalby Way, the A413 and the wider northern Aylesbury road network.

The abandonment of previous strategic transport proposals, including the Aylesbury East-West Rail spur and East-West Expressway proposals, further reinforces the importance of demonstrating that the remaining transport network can sustainably accommodate the level of development proposed.

### **Flood Risk and Drainage**

Flood risk and drainage remain significant concerns.

The Regulation 19 policy itself recognises flood-risk constraints and requires further hydraulic modelling of Hardwick Brook and Weedon Ditch, together with flood alleviation and sustainable drainage measures.

The fact that further hydraulic modelling will be required at planning-application stage reinforces the Parish Council's concern about whether the full consequences of development of this scale have been sufficiently established before allocation.

Development will substantially increase impermeable surfaces within an area where existing watercourses and lower-lying land already require careful management.

The Parish Council therefore considers that there must be robust evidence that development will not increase flood risk within Berryfields, Watermead or other downstream communities and that the necessary drainage and flood-alleviation infrastructure is deliverable before development proceeds.



### **Agricultural Land and Environmental Impact**

The Parish Council remains concerned about the permanent loss of agricultural land and the environmental consequences of developing a substantial area of existing countryside.

Previous planning decisions affecting this area specifically identified the loss of Best and Most Versatile agricultural land as a material harm.

The environmental cost of development of this scale must therefore be properly weighed against reasonable alternatives and cannot simply be treated as capable of being overcome through landscaping and green infrastructure within the development.

The Parish Council considers that the ecological consequences of development should be established at the plan-making stage and that important existing habitats and landscape features should be protected through the allocation policy and subsequent masterplanning, rather than relying principally upon mitigation being determined through individual planning applications.

The Parish Council is also concerned about the impact of development upon existing wildlife habitats and ecological connectivity, including established hedgerows, mature trees, watercourses and the ecological corridor associated with Hardwick Brook. These existing landscape features have value not only individually but as interconnected habitats and should be afforded appropriate protection.

### **Cumulative Impact**

The Parish Council considers that one of the most significant issues is the cumulative effect of successive major developments around Aylesbury.

Berryfields should not be considered in isolation from Buckingham Park, Watermead, Kingsbrook, existing commitments and the further strategic growth now proposed.

The cumulative effects upon roads, schools, healthcare, hospital services, drainage, community infrastructure, landscape and the identity of individual communities need to be assessed collectively.

It is not sufficient to demonstrate that each development can potentially mitigate its own immediate impact if the combined result is unacceptable pressure upon infrastructure and services serving the existing population.

### **Parish Council Involvement and Infrastructure Delivery**

Given the direct impact that development at AYL06 and the wider NESS003 strategic growth would have upon Berryfields and its existing residents, Berryfields Parish Council requests that it is formally involved in the preparation and development of any masterplan affecting these sites.

The Parish Council also requests meaningful engagement in discussions concerning infrastructure priorities, Section 106 obligations and the monitoring and delivery of infrastructure associated with the development.

Infrastructure requirements should include clear and enforceable delivery triggers linked to appropriate stages of development and numbers of dwellings occupied. This is necessary to avoid essential infrastructure being delivered only after significant numbers of new homes have already been occupied.

The Parish Council considers that continued engagement with affected local councils and communities should form an integral part of the masterplanning and delivery process.



## **Conclusion and Soundness**

Berryfields Parish Council recognises the requirement for Buckinghamshire to plan positively for housing growth.

However, the need for housing does not remove the requirement for the Local Plan to demonstrate that the locations selected are justified, sustainable and capable of being supported by the infrastructure required.

The Parish Council considers that significant concerns remain regarding Policy AYL06, NESS003 and the wider strategy for growth north of Aylesbury.

In particular:

- previous Secretary of State findings concerning landscape harm and development in this area remain highly relevant;
- the landscape and settlement-coalescence consequences of substantial northward expansion have not been adequately overcome;
- secondary-school provision is not sufficiently identified;
- healthcare and hospital capacity require greater certainty;
- cemetery and burial capacity has not been clearly demonstrated;
- strategic transport capacity and mitigation remain uncertain;
- flood and drainage matters require further modelling;
- the loss of agricultural land and open countryside remains significant; and
- the cumulative impact of development upon Berryfields and neighbouring communities requires substantially greater consideration.

For these reasons, Berryfields Parish Council considers that the Regulation 19 Plan has not adequately demonstrated that the proposed allocation and associated strategy are justified and effective in these respects.

The Parish Council therefore maintains its objection and requests that these matters are considered through the independent Examination of the Local Plan.

Berryfields Parish Council also requests the opportunity to participate in the relevant Examination hearing sessions should the appointed Planning Inspector consider the Parish Council's participation necessary to assist consideration of these matters.

Kind regards

**Anthea Cass CiLCA**

Parish Clerk  
Berryfields Parish Council