Contact: Matt Thomson
Tel: 01844 355507
Mob: 07748 920067
Email: planning@chilternsaonb.org
Web: www.chilternsaonb.org

By email only to TechnicalPlanningConsultation@communities.gov.uk
My Ref.: F:\Planning\Responses\National

Changes to the current planning system
Response from the Chilterns Conservation Board

The Chilterns Conservation Board (CCB) is grateful to be consulted on the government's proposed changes to the current planning system. Further information about the Board and its role is appended at the end of this document.

We did not find that the format of the online survey presented alongside this consultation was conducive to our response. We trust that this submission will be considered by MHCLG officials as being in order. As requested, we have attempted to relate our comments to the consultation questions where it has been possible to do so.

General Overview

The CCB recognises that the changes set out in this consultation are proposed partly in response to government's long-term aspirations for planning reform, in line with the proposals set out in the parallel Planning White Paper (PWP) "Planning for the future", as well as in response to short term pressures, including supporting economic recovery during and after the Covid-19 pandemic.

Our understanding is that the PWP does not propose to alter the purpose and function of protected landscapes (including AONBs and National Parks). Similarly, the government has not so far given any indication that, in the context of both the Glover Review and the Building Better Building Beautiful Commission, it has any long-term ambitions to anything other than strengthening its commitment to the protection, enhancement and enjoyment of England's national landscapes. Hence, our responses to this consultation are built around a position that the government's planning reforms, in both the short and long-term, will naturally aspire to at least maintain, and preferably improve, the effectiveness of the planning system in protecting and enhancing these natural and cultural resources in general, and the Chilterns AONB in particular.

The standard method for assessing housing numbers in strategic plans

It is regrettable that the consultation questions dive straight into the detail of the proposed changes without covering matters of principle, including the matter of whether the standard method is working as had been intended.

How the standard method is applied

The consultation paper reiterates the position that the standard method currently provides the "starting point" for planning for housing and "does not establish the housing requirement". As with the existing NPPF and PPG, the paper is silent on how LPAs are expected to move from their standard method figure to a sustainable local plan housing requirement.

Experience suggests that the reality, both in plan-making and in decisions on planning applications and appeals, is that the standard method figure is often taken as being the housing requirement. In practice, LPAs are expected to plan to meet, and preferably to exceed, the standard method figure, and reductions of that figure to account for environmental or policy assets (rather than an absence of developable land within the council area) appear in practice to be rare.

The description of the current approach given in this section of the consultation paper does not make any reference to the potential for councils to plan for a housing requirement that is less than their standard method figure (under the existing or revised method). This is a critical omission given the clarity of the government's intentions expressed in the NPPF's flagship "presumption in favour of sustainable development" policy at para 11(b) that policies should not provide for meeting objectively assessed needs where "the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area". The omission serves to reinforce the experience that councils are not supported, either in practice guidance or in decisions made on planning appeals or in local plan examinations, in correctly following NPPF para 11 by reducing their housing requirement in protected areas such as AONBs and in relation to other policies listed in NPPF footnote 6. The omission is doubly surprising given the proposal in the Planning White Paper (PWP) to "factor in land constraints and opportunities" to the proposed binding housing requirement (PWP proposal 4), and offers no reassurance that the government is in fact committed to the protection and positive management of footnote 6 assets.

A current example of the failure to recognise and properly embody this NPPF policy in local plans may be found with the outcome of the examination into the South Oxfordshire Local Plan. Here, the LPA had a challenging but enlightened approach in its AONBs (Chilterns and North Wessex Downs), setting a guideline 15% growth aspiration for market towns and villages, which could be revised downwards (or indeed upwards) through neighbourhood plans in accordance with NPPF para 11(b), enabling constraints and opportunities properly to be taken into account. Following the examination, however, the Inspector concluded that because he had seen no evidence that the 15% growth aspiration would necessarily cause harm to the AONBs, he would change the plan so that the aspiration became a target, to be met and exceeded, and removed the policy allowing for neighbourhood plans to revise the figure. Evidence that growth of 15% or more in the towns and villages of the AONB could cause harm to the natural beauty of the area had not been submitted to the examination

because the submitted plan policies delegated those considerations to the preparation of neighbourhood plans. Critically, but not acknowledged by the Inspector, he had seen no evidence that such growth could be accommodated without harm to the AONBs. This situation puts the South Oxfordshire Local Plan in the position of containing a strategic policy whose achievement may necessitate the choice between either conscious and unnecessary harm to an AONB or failing to meet the binding housing targets of the local plan. We consider that such a policy would conflict with NPPF para 11(b), and may be unlawful with regard to the duty under s.85 of the Countryside and Rights of Way Act 2000, and will be writing to the council and the Inspector as part of our response to the main modifications consultation which is currently live.

It is our view that evidence that it is not practicable to demonstrate conclusively that development can meet an abstractly defined and top-down imposed housing target without causing harm to an AONB (or indeed any other NPPF footnote 6 asset) without a better understanding of the nature and location of the development necessary to meet such a target. The proper approach in such areas must be to identify their specific development needs (rather than the proxy for the intensity of demand that the standard method – whether proposed or existing – provides) and match those needs up to the opportunities available to meet them without causing unnecessary harm to the purposes of the area's designation.

For some protected landscapes, where the designation covers most, if not all, of a local planning authority's area, and indeed extends beyond it, this is particularly critical. Arguably, the Chilterns AONB benefits from an arrangement of local authority boundaries that enable councils, for the most part, to direct growth to considerable non-designated areas of land within their remit, away from the AONB, often without even needing recourse to the flawed duty to cooperate. This will be even more so for the Chilterns now that Buckinghamshire Council is a unitary authority. This is not without its flaws, however, and the situation might be improved if AONB Conservation Boards (and other AONB bodies as appropriate) could benefit from special status as a consultee on development plans and a statutory consultee for development management, and/or be empowered to prepare AONB-wide development plan documents.

It is submitted that the proposals to amend the standard method are of considerably less importance than is the need to address the issue of setting a sustainable housing requirement in areas covered by footnote 6 assets and their settings. We would submit that AONBs (and their setting, where these are not already built up) should explicitly be excised from the area in which LPAs should seek to identify opportunities for major development to meet identified needs. Instead, as noted above, the specific needs of communities within AONBs should be identified and opportunities to meet those needs without harm to the purposes of designation identified through an AONB-wide (potentially including its setting) development plan document. The contribution to the housing stock so identified in that plan area may then be subtracted from that applying to the rest of the LPA's area. This approach would be consistent with the current NPPF policy and PPG, while fixing a glaring omission in the latter, and would also, we submit, be consistent with the proposals for "protected areas" included in the PWP.

How the standard method is calculated

In recent years there has been a tendency by governments, the development industry and communities to obsess about the details of the calculation of housing need, despite the rather obvious fact that what gets built rarely reflects the identified needs (in terms not only of the headline number of homes built, but also with regard to location, quality and affordability). Indeed, there is considerable evidence that councils are granting permission for sites considerably in excess of the need identified by the standard method (and in addition there are sites allocated in local and neighbourhood plans, on brownfield registers and which are subject to neighbourhood, local or national development orders), so there is a fundamental unanswered question about whether it is a failure of *planning*, let alone the method itself, that is responsible for housebuilders' failure to build enough homes (see the Letwin Review).

Constantly tweaking the minutiae of the standard method (which is, as the consultation paper emphasises, only a "starting point", and arguably simply a proxy for real housing demand, somewhat removed from actual housing need) will not itself result in more homes being built, let alone the right homes in the right places which people can afford to live in.

Many of our stakeholders question the rigging of the standard method to ensure that it results in an aggregate figure that equates to the provision of around 300,000 homes a year. While it is recognised that this is a commitment of the government (enshrined in its recent election manifestoes – and indeed the manifestoes of other major parties included a similar aspiration), there remain serious questions about whether (a) that level of housing delivery can be achieved and sustained, and (b) whether that figure is appropriate in order to achieve the intention of slowing (let alone halting) house price inflation. Indeed, many observers note that the construction industry has no interest in building that many homes, since their business model is dependent upon high levels of house price inflation. This is of importance to AONBs because an inflated aspiration for housebuilding, especially one that directs imputed demand to areas rich in protected landscapes, can result in unnecessary harm to the character and natural beauty of these protected areas. In addition, aiming for an aggregate outcome of 300,000 homes per year (which each area should aim to exceed) leaves no wiggle-room in terms of capacity for the delivery of particular area-specific growth aspirations, such as the Oxford-Cambridge Arc, where growth is anticipated to be significantly higher than indicated by the standard method. So far there are no proposals for LPAs in protected areas to be able to trade excessive outcomes of the standard method with those areas with higher growth aspirations.

The fundamental principle of having a standard method of assessing housing need is to avoid interminable debates at local plan examinations over which method should be applied. Having a standard method is a good thing from this perspective, although it arguably shifts the debate to the arena of determining the sustainable local plan housing requirement instead – this being an area as noted above on which the current NPPF, planning practice guidance, and indeed this consultation are all notably silent.

That said, the details of the standard method, and the proposals for its reform, are fundamentally in conflict with the principle of conserving and enhancing England's protected landscapes, and can be argued to be in conflict with s.85 of the Countryside and Rights of Way

Act 2000, since the methodology builds in a tendency to direct development towards protected landscapes, and to the Chilterns in particular, as follows:

- Linking the assessment of demand to either existing housing stock or projected household growth (**Q1-2**) both lock existing patterns of development in to future growth: this is particularly harmful in the Chilterns AONB which, as a result of its proximity to London and transport connectivity, is already much more densely developed than many other protected landscapes; the Chilterns is also adjacent to several prosperous and fast-growing centres, including Reading, High Wycombe, Hemel Hempstead and Luton/Dunstable, and growth in these and less immediate areas such as the Oxford-Cambridge Arc can exert pressure on the Chilterns area not only in terms of direct development but also visitor numbers that are increasingly difficult to manage. Planning should not merely extend past trends or follow the market, but positively influence a better, more sustainable future.
- Linking the assessment of demand to affordability is also problematic because, as any viewers of BBC's "Escape to the Country" will know, house prices are higher in or near to protected landscapes than elsewhere (across England the premium is often cited anecdotally as being in the region of 20-30%, but research undertaken by Savills quoted in the Chilterns AONB Management Plan 2019-24 (p.81) suggests that house prices in the Chilterns AONB are 75% higher on average than in the same counties outside the AONB). In protected landscapes the high house prices are not so much a reflection of a shortfall in the number of homes needed to house people working in those communities, but because protected landscapes are a desirable place in which to live, and some people are prepared to pay more to live there, and also to commute further distances in order to do so. Simply building more market homes in such areas does not necessarily meet local housing needs and, because new homes tend to be of a high specification (potentially exacerbated by removal of small site affordable housing contribution thresholds), the more new homes that get built, the higher the average house price gets (**Q3-5**).

In addition, both the affordability and existing stock approaches similarly lock existing inequalities in to the future growth of England as a whole, putting greater pressure still on the most pressured protected landscapes around London and in the wider South East and East of England (perhaps also immediately around the West Midlands and Liverpool-Manchester-Leeds). The slavish adherence to market signals for the purposes of planning new homes in effect runs counter to other initiatives, including the "Levelling Up" agenda of the Industrial Strategy, helping to regenerate England's "forgotten" towns and cities, and also countering economic decline and population loss in parts of the midlands and north, which can be damaging to the protection and enhancement of protected landscapes in those areas.

Delivering First Homes

Meeting varying needs for housing that people can afford to live in requires a range of different solutions, reflecting not only people's varying needs but variations in the housing market and development context operating in different places. The addition of First Homes to the mix of housing products is to be welcomed, and government should be commended for the considerable effort put into resolving concerns about previous similar initiatives ("Starter Homes" and "Entry-level homes") such as controlling their abuse for investment purposes, protecting the discount on future sales, and increasing the discount to as much as a potential 50%.

In principle First Homes could be especially welcome in areas like the Chilterns AONB where property values are particularly high, but the wages of many people working in the area's communities are relatively low. We are particularly supportive of the option to increase the discount above 30%, since it is well known that homes within AONBs command a higher price than those outside the boundaries (across England the premium is often cited anecdotally as being in the region of 20-30%, but research undertaken by Savills quoted in the Chilterns AONB Management Plan 2019-24 (p.81) suggests that house prices in the Chilterns AONB are 75% higher on average than in the same counties outside the AONB). We advise that being located within a protected landscape should be given in planning practice guidance as an example of where a higher discount will automatically be justified.

Q8

Notwithstanding the above support for First Homes as a product in the menu of affordable housing, the mix of affordable housing products in an area should be determined in response to an assessment of local housing needs, rather than centrally, otherwise we may fail to address the needs of the most vulnerable households in a particular area. The policy as currently proposed may also provide a variety of "affordable" housing that is not needed in the locality, and, currently, the ratchet works so that First Homes that cannot be marketed to local people will instead be marketed to those without a local connection, rather than changing the tenure to address the needs of local people for whom First Homes are not an option. Allowing local authorities to determine the mix of affordable housing products in their own areas (and in sub-divisions of their areas) is a principle that should apply across the board; it should definitely apply in sensitive areas where the opportunity to identify sites for affordable housing may be limited, such as AONBs, and **we therefore advise that Designated Rural Areas (including AONBs and National Parks) should be exempt from the centrally imposed requirement to provide 25% of affordable housing as First Homes** (see also Q9-11)**.**

If government is determined to push ahead with the imposition of a minimum of 25% of affordable homes being provided as First Homes, then this product should only replace other forms of discounted home ownership. In this circumstance, **we would prefer option (i) under Q8**. It would be deeply concerning if social rented homes, which are of critical importance to rural communities, especially in high value/high demand areas such as the Chilterns AONB, were to be sidelined in favour of discounted homes for people who may not have a local connection to own. The idea of leaving the determination of which tenures of affordable homes should be sacrificed to First Homes down to negotiation runs counter to the desire for a planning system based on more clearly defined rules, as set out in the Planning White Paper. Developers need the certainty of knowing what contributions they need to make towards affordable housing (as well as other costs) when negotiating the value of land, and this certainty is needed up-front without scope for later "negotiation".

Q9-11

As noted above, the range of exceptions currently applied to the 10% affordable home ownership policy should be maintained with regard to First Homes.

We advise that Designated Rural Areas (as defined in the current NPPF glossary), including AONBs and National Parks, where there is a greater sensitivity to meeting precisely-defined affordable housing needs, should be exempt from the 25% First Homes policy (but retaining the First Homes product as an option to be factored in to the tenure mix).

Q12

The proposed transitional arrangements with regard to local plans are acceptable. The wording of the arrangements in para 58 for the consideration of advanced planning applications is unclear, however. This seems to open LPAs up to a requirement to negotiate less favourable tenure mixes during the transition period than would be required after the implementation of the policy if option (i) under Q8 was adopted. We advise that this is clarified to avoid a potential hiatus in the delivery of priority form of affordable housing.

Q13

We support the general approach to levels of discount. However:

1. The wording of para 59 suggests that discounts must only be 30%, 40% or 50%. It could be that factors such as viability testing of local plan policies results in a workable discount that is not an exact multiple of 10%. **We advise that the policy is worded to enable a discount of any amount between 30 and 50% inclusive.**
2. Para 60 could be read as implying that, where a discount higher than 30% is applied, then the 25% minimum proportion policy must always apply. The policy should clarify that the minimum of 25% policy will only "remain in place" where it would originally have applied, i.e. not with regard to the exemptions discussed under Q9-11.

Q14-16

The original 'rural exceptions' policy has recently become very muddied and strayed away from its intended purpose of encouraging responsible landowners to release small amounts of land at significantly less than developable market value in order to provide affordable housing in perpetuity to meet specifically identified local needs. This policy depended upon a strongly restrictive approach to windfall developments on greenfield sites in rural areas, which is no longer clear-cut. Instead there is a sliding scale of opportunities for landowners, with varying levels of risk and reward, which pushes the potential for the provision of affordable homes to meet local needs to one side in favour of more lucrative options. There are many documented cases of landowners who had previously been considering a rural exceptions scheme now sitting on their land pending a better opportunity, to the detriment of the provision of affordable homes. Furthermore, many LPAs and landowners are not pursuing rural exceptions sites because they have no experience of doing so or they believe the developments will not be viable: more could be done to promote the scheme and provide good practice examples of where they have worked successfully.

There are many better ways of identifying land for development as First Homes (and market housing) than an "exceptions"-based approach that is really anything but, principally through the local and neighbourhood planning processes, which enable the strategic and rational identification of the most sustainable options for development, including aligning new homes with new infrastructure and workplaces, and ensuring that such developments are appropriate in scale with the communities in which they are placed.

We favour the withdrawal of both the existing entry-level exceptions policy and the proposed First Homes exceptions policy from the options available in favour of proper strategic planning and a return to the earlier, strictly-applied, rural exceptions policy. This would be more consistent with the "rules-based" approach sought in the Planning White Paper.

Nonetheless, **we fully support the exemption of Designated Rural Areas (including AONBs and National Parks) from the First Homes Exceptions policy**. We note that some have suggested that the exemptions should apply only to settlements of less than 3,000 population, but there are many villages and small towns in and on the edge of the Chilterns AONB of that size where a First Homes exception site could be unnecessarily harmful to the character and natural beauty of the designated area or its setting. We strongly recommend that the exemption applies to all Designated Rural Areas: communities would still have the option to plan strategically for the provision of First Homes through local or neighbourhood plans.

Supporting SMEs

Q17-21

While we recognise that developer contributions can be a proportionally greater burden on smaller developments, there remain questions as to whether this is necessarily an outcome of the small sites policy thresholds, since the residual method of land valuation suggests that the costs of development, including developer contributions, should be accounted for in the price paid for development land. Introducing a temporary change to the threshold for affordable housing provision will simply disrupt the property trading process, leading to landowners securing a higher price for sites rather than benefiting SME developers: the risk is that still fewer affordable homes will be delivered.

Raising the site size thresholds for developer contributions may also increase the attractiveness of small-to-medium-sized sites to larger development companies, whose large-site business models would benefit from the relief from developer contribution requirements on sites between 10 and 50 units, thereby increasing competition from larger operators over the SMEs this policy would be intended to benefit.

Q22

We strongly support the retention of smaller site size thresholds for developer contributions in Designated Rural Areas (including AONBs and National Parks).

Furthermore, we consider that the take-up of the option for LPAs to set lower site size thresholds in rural areas has been lower than it needs to be, as a result partly of resource constraints leading councils to prioritise other issues, and partly of landowner and developer lobbies being effective in promoting their own interests. This has been to the detriment of the delivery of affordable homes, for which there is a critical need in all rural areas to enable low-waged and key workers to support communities and local economies. **We advise that a smaller site size threshold should be the default in Designated Rural Areas rather than something to justify through a local plan** (although an option could be retained for LPAs to choose to vary that threshold where the identified need for affordable homes is demonstrated to be negligible over the plan period).

Q23

Overall, the debate around site size thresholds highlights the fact that many of the problems associated with development, whose solutions are seen by some as lying solely with planning reforms, might better be solved by reforms to the ways in which land is traded and how the development industry operates outside of the planning system, as was hinted at in the

Housing White Paper ("Fixing our broken housing market") in 2017, but not subsequently followed up.

Support for SME builders might better be provided by reversing the trend towards the allocation only of major "strategic" sites in local plans, and encouraging the identification of small sites in local plans, neighbourhood plans and brownfield registers, and by requiring that major development sites set aside a proportion of land for development by SMEs in order to spread the burden of market absorption, as suggested by the Letwin Review.

Extending permission in principle

Q24-34

The problem with the proposals relating to permission in principle (PiP) is that the whole initiative is based on a misconception that the principle of a development is not already adequately conferred by a development plan allocation, a outline planning permission or the variety of other existing in-principle consents available in the planning system, and that the current and proposed forms of PiP will confer such certainty.

The principle of consent always comes with strings attached – and that must be the case (otherwise it's not really "planning"). Those strings might be a list of criteria in a local plan policy, a development brief adopted as SPD, a list of conditions attached to an outline planning consent, an area specific design guide or code or the details of a national, local or neighbourhood development order. Other than the conditions of national development orders, the strings attached to these consents are all arrived at in negotiation with the landowner/developer, often mediated by a government-appointed Inspector to ensure that conditions are not unreasonable. Those options are all available under the current planning system without the need for layering PiP over the top. Any or all of them should be sufficient for an investor to progress with a scheme that accords with those criteria, since, if a detailed planning application was submitted (or, in the case of a development order, construction simply started) and the local authority refused the proposal or took enforcement action, the Planning Inspectorate would swiftly approve any appeal and most likely award costs against the council.

The issue at hand is not one of enabling "landowners and developers to have certainty that the principle of development for housing only needs to be established once in the process before developers need to get into more costly, technical matters" (para 89) – that exact process is already in place, through development plans and outline consents. What is really at issue here is landowners and developers wanting to be able to construct something different from what permitted under the consent they already have.

In a protected landscape there are almost no circumstances in which a lower level of information requirements at the application stage or a greater level of flexibility in implementing a planning consent than is already available through the existing planning system may be seen as compatible with the principle of protecting and enhancing the character and natural beauty of the designated area (or, indeed, its setting), especially when the cumulative impacts of many such flexibilities over time are taken into account (this general principle is also relevant to Q26-27). **We advise that it is therefore essential that protected landscapes (indeed all NPPF footnote 6 assets) should be exempted from any expansion of the PiP regime** (and, ideally, from those aspects of it that are already in place).

Of grave concern in the consultation document is the second sentence in paragraph 89 which says: "*This* [establishing the principle of development once in the process] *is particularly important for smaller sites which have not been allocated in local plans and where there is now, due to the rapidly changing economic circumstances, a desire by landowners to release the land for housing.*" If a small site has not been identified in a local plan it could be because the site has specifically been determined through the democratic and highly-scrutinised local plan process not to be appropriate for development for a legitimate NPPF-compliant reason. Economic circumstances on their own may not be sufficient to overcome that principle, and the mere desire of the landowner to release the land is surely rather less relevant than an identified local need for the development. Nonetheless, the landowner is perfectly able, under the current planning system, to explore the suitability of their site for development with reference to any extant criteria-based local or neighbourhood plan policies or "exceptions" policy in the NPPF, and to test that suitability with an outline planning application if they can't stretch to the cost of getting detailed designs drawn up and submitting a full application (or, indeed, if he or she can't wait a maximum of 5 years to pursue the site through a local plan review, or persuade the local community to support the development through a neighbourhood plan or community right to build order).

We are also concerned with the relationship between expanding the application of PiP and the checks and balances that are generally provided in the planning system by environmental impact assessment (EIA), in particular how flexible the PiP might be with regard to housing developments that are close to the Schedule 2 thresholds, and whether it is appropriate for a PiP application not to be subject to a cap on associated commercial development just because the proposal is "housing-led" (relevant to Q25).

CCB is grateful for the opportunity to comment.

Yours sincerely

Dr Matt Thomson MRTPI AoU
Planner, Chilterns Conservation Board

Appendix 1: About Us

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).