

# Sustainability Appraisal (SA) of the Vale of Aylesbury Local Plan (VALP)

SA Report Addendum

December 2020

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## NON-TECHNICAL SUMMARY

### Background

The Vale of Aylesbury Local Plan (VALP) was submitted to the Secretary of State for Housing, Communities and Local Government, for examination by an appointed Planning Inspector, on 28th February 2018. Examination hearings sessions were held in July 2018, followed by the publication of Interim Findings by the Inspector, followed by consultation on proposed modifications to the submitted VALP in October 2019.

Subsequently, throughout 2020, work has continued to further update the VALP in response to consultation responses received and new evidence that has emerged. In light of this work, further proposed modifications are now published for consultation, with this SA Report Addendum published alongside.

### This SA Report Addendum

The Local Plan is being developed alongside a process of Sustainability Appraisal (SA), a legally required process that aims to ensure that the significant effects of an emerging draft plan (and alternatives) are systematically considered and communicated.

The aim of this SA Report Addendum is essentially to present information on the further proposed modifications, and alternatives, with a view to informing the current consultation and plan finalisation.

In order to achieve this aim, this SA Report Addendum sets out to answer three questions:

**1) What has plan-making / SA involved up to this point?**

- particularly in terms of the consideration given to reasonable alternatives.

**2) What are the SA findings at this stage?**

- i.e. in relation to further proposed modifications.

**3) What happens next?**

Each of these questions is answered in turn below.

### What has plan-making / SA involved up to this point?

This part of the report explains the process of establishing and appraising **reasonable alternatives** and feeding back findings to the Council in order to inform decision-making.

Specifically, the focus was on reasonable alternative approaches to allocating sites through **Policy H6b** in order to meet the established need for older persons housing provision (C2 planning use class, as opposed to housing for the wider population at large, which falls under the C3 planning use class.).

Work to explore reasonable alternatives focused on this matter because it is a key issue to be addressed through further proposed modifications. The Buckinghamshire Housing and Economic Development Needs Assessment (HEDNA) identified that there is a significant need for new older persons' housing in the District, and hence there is a need for the VALP to proactively respond by allocating specific sites (although there is also a role for windfall schemes aided by suitably permissive policy). The October 2019 Modified VALP sought to respond proactively through the introduction of Policy H6b, with the policy proposing three allocations; however, issues have arisen in 2020 which lead to the conclusion that there is a need to revisit Policy H6b.

Establishing the reasonable alternatives

The process of establishing reasonable alternatives involved: A) examining the merits of all potential allocation options in order to establish a final shortlist; and then B) identifying packages of the shortlisted allocation options, where each package would collectively provide for C2 older persons housing needs as far as reasonably possible. More specifically, the aim was to identify packages of site allocations with capacity sufficient to meet the identified need figure for the first five years of the plan period, which is 465 units.<sup>1</sup>

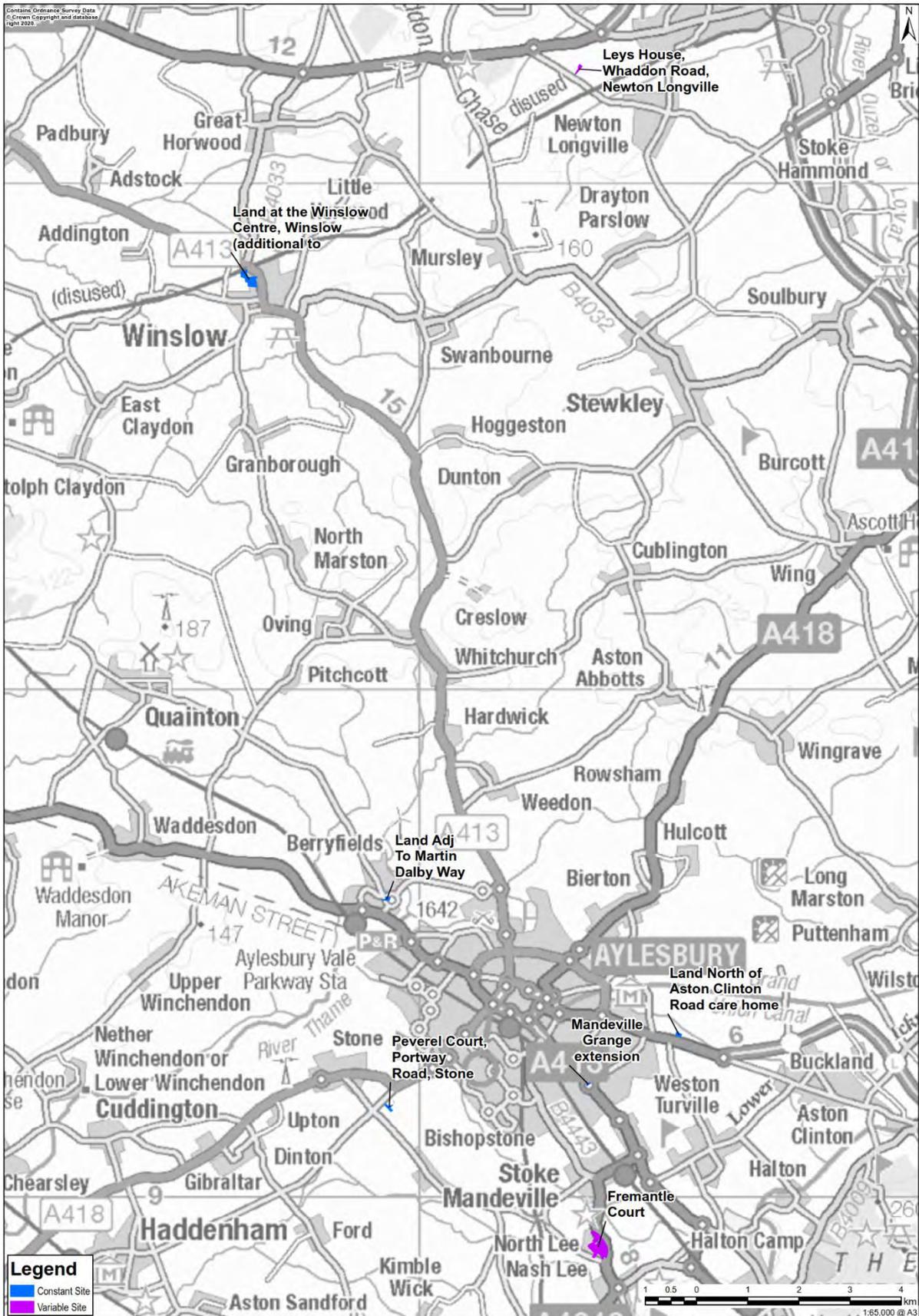
The conclusion was reached that there were (and are) four reasonable alternatives – see Table A. Further information on the process of arriving at these reasonable alternatives is presented in the main report. However, in brief, the process involved differentiating between: A) sites that can reasonably be held **constant** across the alternatives – because they are relatively firmly supported, in planning terms (and given the stretching need/target figure); versus B) sites that should reasonably be a **variable** across the alternatives – because the decision on whether or not to allocate is more finely balanced ('marginal'). Figure A serves to highlight the two sites that are a variable across the reasonable alternatives.

Table A: Reasonable alternative approaches to C2 allocation through Policy H6b (with variables highlighted)

Source of supply		# units			
		Option 1	Option 2	Option 3	Option 4
Allocations published within the Modified VALP (2019)		168	168	168	168
New allocations	Land at the Winslow Centre, Winslow	53	53	53	53
	Mandeville Grange Nursing Home, Wendover Road, Stoke Mandeville	16	16	16	16
	Land adjacent to Martin Dalby Way/Paradise Orchard, Berryfields	60	60	60	60
	Bartletts Residential Home, Peverel Court, Portway Road, Stone	12	12	12	12
	Land north of Aston Clinton Road, Weston Turville (care home)	5	5	5	5
	Leys House, Whaddon Road, Newton Longville	-	60	-	60
	Fremantle Court, Risborough Rd, Stoke Mandeville	-	-	100+	100+
<b>Total supply</b>		<b>314</b>	<b>374</b>	<b>414+</b>	<b>474+</b>
<b># units above/below requirement (465 units)</b>		<b>-151</b>	<b>-91</b>	<b>-51</b>	<b>+9</b>

<sup>1</sup> The total requirement for the entire plan period (2013 to 2033) is 1,930 units; however, 718 units have already been provided since the start of the plan period ('completions') or are set to be provided at sites either with planning permission or allocated in a 'made' (i.e. adopted) neighbourhood plan ('commitments'), leaving a shortfall of 1,212 units to be provided for the 13 remaining years of the plan period (1<sup>st</sup> April 2020 to 31<sup>st</sup> March 2033), which equates to an annual requirement of 93 units. However, in line with paragraph 47 of the NPPF (2012), there is not a requirement to allocate sites to meet the annual requirement for the entire plan period. Rather, there is a need to allocate sites sufficient to meet needs for years 1-5 (2020-2025), with broad locations identified and a planning policy framework in place to address need for remaining part of the plan period (2025 to 2033). The number of units required to be delivered through allocations for the five years of the plan (2020 to 2025) is 465 units (93 home annual requirement x five years).

Figure A: Site options that feature in the reasonable alternatives (both constants and variables)



Appraising the reasonable alternatives

Appraisal findings are presented in Table B.

With regards to methodology:

The table comprises 12 rows - one for each of the sustainability topics that make up the SA framework (see Table 3.1 within the main report). Within each row the alternatives are ranked in order of relative performance (with '=' used to denote instances where the alternatives are judged to perform on a par) and categorised in terms of potential to result in 'significant effects' using red / amber / green shading.<sup>2</sup>

Table B: Appraisal of reasonable alternative approaches to C2 allocation through Policy H6b

Topic	Rank of performance / categorisation of effects			
	Option 1: 314 units	Option 2: 374 units	Option 3: 414 units	Option 4: 474 units
Biodiversity	★1	2	★1	2
Climate change adaptation	=	=	=	=
Climate change mitigation	★1	★1	2	2
Community	2	2	★1	★1
Economy	4	3	2	★1
Heritage	=	=	=	=
Housing	4	3	2	★1
Landscape	★1	3	2	4
Natural resources	=	=		
Pollution	=	=		
Transport	★1	★1	2	2
Waste	=	=	=	=

<sup>2</sup> **Red** is used to signify a significant negative effect, **amber** an effect that is notably negative but not judged to be significant; **light green** an effect that is notably positive, but not judged to be significant; and **dark green** a significant positive effect.

## Discussion

Option 1 stands out as performing well in respect of greatest number of topics; however, it does not necessarily follow that it performs best overall, noting that it performs poorly in respect of three topics (and given that this appraisal does not assign weight to the topics, nor assume that the topics have equal weight). Having made these initial points, the following bullet points consider each of the SA topics in turn (drawing on evidence and discussion of site-specific issues/opportunities set out in Appendix I).

- Biodiversity – there are notable sensitivities associated with “Leys House” (Options 2 and 4), with this standing-out as the most constrained of the site options currently in contention for allocation. There are also sensitivities associated with “Freemantle Court” (Options 3 and 4); however, the proposal to deliver a nature reserve as part of the proposed scheme is of note (and is assumed to be a firm proposal). On this basis, Options 2 and 4 are judged to perform relatively poorly; however, significant negative effects are not predicted (with this conclusion reached taking account of sensitivities associated with two of the sites that are a constant across the RAs, namely “Mandeville Grange” and “Bartletts”).
- Climate change adaptation – flood risk is the key consideration here, but is not a constraint to development at either of the sites that are a variable across the alternatives. With regards to the sites that are held constant across the RAs, one site gives rise to a degree of concern (Mandeville Grange Nursing Home, Wendover Road, Stoke Mandeville); however, significant negative effects are not predicted.
- Climate change mitigation - there are concerns in respect of emissions from transport associated with Freemantle Court (Options 3 and 4), and whilst the proposal to deliver a ‘net zero’ emissions scheme (without offsetting) is of note, it must be assigned limited weight as part of this appraisal, as it is potentially subject to change. With regards to Leys House (Options 2 and 4), there is potentially a degree of opportunity, in respect of supporting delivery of a heat network; however, this is highly uncertain. On this basis, it is challenging to differentiate the alternatives, but Options 3 and 4 are judged to perform relatively poorly on balance. Significant effects are not predicted, also taking account of the sites that are a constant across the alternatives, which do not give rise to any notable issues or opportunities.
- Community – the proposed scheme for Freemantle Court (Options 3 and 4) involves delivery of a new nature reserve and modest new community facilities (and these are assumed to be firm proposals). With regards to the sites that are held constant across the RAs, there is potentially a degree of opportunity associated with Land at the Winslow Centre, Winslow. In conclusion, Options 3 and 4 perform well, but significant positive effects are not predicted, recalling the localised nature of benefits that would accrue.
- Economy – Option 4 is preferable as it will lead to additional new employment; however, significant effects are not predicted on balance, given the scale of new employment opportunity in question.
- Heritage – there are limited sensitivities associated with any of the sites in question, as discussed in Appendix I. As such, the alternatives are judged to perform on a par and significant effects not predicted.
- Housing - Option 4 performs well as the C2 provision target would be met. The proposed supply buffer is small (9 units), such that unforeseen delays to delivery at any one of the proposed allocations could potentially lead to a shortfall against the target; however, concerns are allayed by the likelihood of additional windfall supply. Options 2 and 3 involve a shortfall against the target; however, significant negative effects are not predicted as there would be a strong possibility of the shortfall being addressed by one or more windfall schemes. As for Option 1, it seems unlikely that the target figure would be met in practice (even with windfall), hence significant negative effects are predicted.
- Landscape - there are sensitivities associated with both of the sites that are variables across the alternatives, and this is particularly the case for “Leys House”. This suggests that Options 2 and 4 perform relatively poorly. Landscape impacts under these two options would be experienced by the new community at the committed Salden Chase strategic urban extension and potentially also those accessing the open countryside to the southwest (accessible via a bridleway); however, effects would nonetheless be localised in the context of the plan area, hence significant negative effects are not predicted. Two of the sites that are a constant across the alternatives also give rise to a modest degree of concern.
- Transport – there are notable highways concerns associated with Freemantle Court; however, there is good potential for mitigation, as discussed in Appendix I. None of the other sites in question give rise to any notable concern. On this basis, significant negative effects are not predicted.
- Natural resources, pollution and waste – no issues / opportunities / impacts of note.

It is for the Council to give consideration to these appraisal findings when selecting a preferred option, assigning weight to the topics and explaining any necessary trade-offs – see discussion below.

### Selecting the preferred option

Set out below is a statement prepared by Council officers setting out reasons for supporting the preferred option (Option 3) in light of the appraisal:

The council can meet its C2 5-year requirement if all sites assessed herein are allocated. However, if two of the sites, Fremantle Court and Leys House, were to be allocated they would have negative impacts as set out above. The key decision is whether the two sites can be included without incurring unacceptable impacts. Although Fremantle Court performs relatively poorly against some indicators, particularly climate change, landscape and transport, it is considered that the need for C2 accommodation weighs strongly in favour of option 3. Also, the negative effects of including Fremantle Court can be offset by specific requirements in the policy which will limit the negative impacts. It is noted that option 5 including Leys House performs best against the housing factor, but it is considered that unlike Fremantle Court it is not possible to mitigate the impacts of including the site and its inclusion cannot be justified. Option 3 is therefore preferred, and the council accepts that the C2 5-year housing requirement cannot be met from the options available without incurring an unacceptable impact. It is expected that planning permissions will quickly resolve the shortfall.

### What are the SA findings at this stage?

Part 2 of the main report presents an appraisal of the further proposed modifications under the SA 'framework' (see Table 3.1 of the main report). Summary appraisal findings are presented below.

#### Biodiversity

The further proposed modifications to site-specific and thematic policies are **strongly supported** from a biodiversity perspective. Two of the proposed allocations for C2 older persons accommodation give rise to a limited degree of concern from a biodiversity perspective. Proposed new policy in respect of biodiversity net gain potentially warrants detailed scrutiny, as this is an emerging policy area.

#### Climate change adaptation

One of the proposed allocations for C2 older persons accommodation gives rise to a limited degree of concern, from a flood risk perspective; however, on the whole, the further proposed modifications to site-specific and thematic policies are **strongly supported** from a flood risk perspective.

#### Climate change mitigation

There are concerns regarding greenhouse emissions from transport that will result from two of the new proposed allocations for C2 older persons accommodation; however, the further proposed modifications to Policy T8 (Electric Vehicle Parking) are supported (the possibility of further supplementing the policy could be considered, recognising that this is a fast moving policy area). Overall, the further proposed modifications will lead to **mixed effects**, with the effects of limited significance.

#### Communities

The further proposed modifications give rise to a range of considerations, in respect of 'communities' objectives, but overall are **broadly supported**. Site specific policy is amended for four strategic sites, with the most notable proposal being in respect of an additional requirement for Shenley Park (in respect of extending a bridleway into the site), which is strongly supported. Other notable changes seek to respond to the new town centre use classes (which essentially allow for greater flexibility around changes of use, and will result in a wider mix of uses in town centres, with less retail dominance) and national trends in respect of retail.

#### Economy

The key consideration here is the VALP response to the recent national changes to town centre planning use class orders. There is an inevitable need to respond to the national changes by altering policy to clarify that class E uses will be permitted on high streets in locations where there was previously support for retail (which is now just one element of class E); however, in response to concerns regarding the vitality of town centres as retail centres, the proposal is for the policy to include support for particular appropriate class E uses (changes from retail to other types of class E use will still happen where no consent is required, but this is thought likely to be a fairly rare situation).

This is considered to be a balanced and appropriate response; however, there is clearly a need for close scrutiny, given that this is a new area of policy for Local Plans, and given evolving views on the future of retail and town centres. There is also a need to consider the implications of the new E use class for employment areas, where there will now be greater potential for retail to come forward. In conclusion, the further proposed modifications are **broadly supported**.

#### Heritage

The proposed modifications potentially have a bearing on the timing of redevelopment at RAF Halton, which is a sensitive site from a heritage perspective; however, there is a new requirement for heritage statements to be submitted as part of planning applications in some circumstances. Overall, the further proposed modifications are **broadly supported**.

#### Housing

There is a need to predict that the further proposed modifications will lead to **negative effects** in respect of housing objectives, because the proposed approach to C2 older persons accommodation allocations (Option 3 above) could potentially result in a shortfall against the established need/target figure. Another slight concern relates to the proposal to compress the timescales for delivering homes at RAF Halton. Negative effects are not predicted to be 'significant' on balance, but there is some uncertainty.

#### Landscape

There are sensitivities associated with two of the proposed allocations for C2 older persons accommodation (Fremantle Court; and Land adjacent to Martin Dalby Way/Paradise Orchard, Berryfields); however, concerns are of limited significance. On balance it is appropriate to conclude **limited implications** for the achievement of landscape objectives.

#### Natural resources

The further proposed modifications give rise to **no notable implications**.

#### Pollution

The further proposed modifications give rise to limited implications for pollution objectives, but effects are likely to be **positive** overall, particularly given two proposed site specific requirements to consult with the water and sewerage undertaker.

#### Transport

The further proposed modifications are **broadly supported**, although there is potentially a degree of concern regarding the loss of policy support for long term aspirational transport schemes for Aylesbury Garden Town.

#### Waste

The further proposed modifications give rise to **no notable implications**.

#### Conclusion on the further proposed modifications

The appraisal finds that the further proposed modifications perform well in respect of biodiversity, climate change adaptation (flood risk), communities, economy, heritage, pollution and transport objectives; however, there are notable draw-backs in terms of:

- climate change mitigation (because one of the new proposed allocations for C2 older persons accommodation is located in an isolated location, potentially leading to car dependency); and
- housing (because the combined capacity of the new proposed allocations for C2 older persons accommodation falls short of the established need / target figure).

All of the effects are of limited significance, i.e. significant effects are not predicted. Finally, it should be noted that the appraisal highlights three policy areas (biodiversity net gain; electric vehicle charging; new local centres) that might warrant further scrutiny ahead of plan finalisation.

## Conclusion on the submission plan plus proposed modifications and further proposed modifications

The SA Report concluded as follows, in respect of the Proposed Submission Plan:

*“The appraisal finds the Proposed Submission VALP to perform well in terms of a number of sustainability objectives, with ‘significant positive effects’ predicted in terms of Communities, Economy, Housing and Transport. These significant positive effects mostly relate to the proposal to meet objectively assessed needs - as established by the Housing and Economic Development Needs Assessment (HEDNA) - and focus growth so as to support community and transport infrastructure upgrades.*

*Under one heading - Natural resources - it is fair to conclude ‘significant negative effects’, as the proposed strategy will result in significant loss of best and most versatile (BMV) agricultural land. Several proposed growth locations are associated BMV agricultural land.*

*Also, the appraisal concludes ‘uncertain negative effects’ in respect of two topics: ‘Climate change adaptation’, on the basis that one of the proposed new garden communities at Aylesbury (‘Land north of A41’) is less than ideal in flood risk terms,; and ‘Pollution’, on the basis that a high growth strategy at Buckingham / Maids Moreton will necessitate major to the wastewater treatment works (if a risk of pollution incidents is to be avoided).*

*The Council, and the appointed Planning Inspector, can give consideration to these appraisal conclusions during the Examination in Public. Similarly, the Council / Inspector should give consideration to suggested specific changes to policy wording. Suggested changes cover...”*

The SA Report Addendum (2019) then found that this conclusion “broadly holds true” for the submitted plan plus proposed modifications. This conclusion was reached following an appraisal of the proposed modifications published for consultation at that time, which reached the following conclusion: *“The appraisal predicts positive effects in respect of: communities, economy, housing and transport objectives; however, the appraisal predicts negative effects in respect of: climate change adaptation (flood risk), landscape and natural resources objectives.”*

At the current time the above conclusions still **broadly hold true**. A stand-out consideration is the proposed approach to C2 older persons accommodation; however, it is important to recall that this is just one element of the wider strategy for meeting housing / accommodation needs. Another stand-out consideration relates to the VALP’s response to the recent national changes to planning use classes, which has implications for town centres across the plan area; however, effects are nonetheless of limited significance.

### What happens next?

Subsequent to the current consultation the Inspector will consider all representations received, before then considering whether or not there is a need for further examination hearings. In due course, the Inspector will conclude the **examination** by preparing a report on the soundness of the VALP.

Once the Inspector is able to find the plan ‘sound’, the Council will then **adopt** the VALP.

At the time of adoption an SA Statement will be published that explains the process of plan-making / SA in full and presents “measures decided concerning monitoring”.

The submitted SA Report (2018) suggested the need to consider an increased focus on **monitoring** flood risk, waste-water treatment upgrades (and water quality more generally), delivery of low carbon infrastructure; and travel patterns associated with residents of new garden communities. These recommendations broadly hold-true in light of the 2019 proposed modifications and 2020 further proposed modifications. Additional comments on potential monitoring measures are as follows:

- The 2019 SA Report Addendum reported that the proposed modifications potentially give rise to a need to consider closely monitoring low carbon measures at the new proposed Shenley Park strategic allocation.
- At the current time, the further proposed modifications potentially give rise to a need to consider closely monitoring C2 accommodation provision, with a view to early identification of any deliverability issues. There is also a need to closely monitor changes to uses in town centres.

## 1 INTRODUCTION

### 1.1 Background

1.1.1 The Vale of Aylesbury Local Plan (VALP) was submitted to the Secretary of State for Housing, Communities and Local Government, for examination by an appointed Planning Inspector, on 28th February 2018. Examination hearings sessions were held in July 2018, followed by the publication of Interim Findings by the Inspector, followed by consultation on proposed modifications to the submitted VALP in October 2019 (“the October 2019 Modified VALP”).

1.1.2 Subsequently, throughout 2020, work has continued to further update the VALP in response to consultation responses received and new evidence that has emerged. In light of this work, further proposed modifications are now published for consultation, with this SA Report Addendum published alongside.

### 1.2 This SA Report Addendum

1.2.1 The Local Plan is being developed alongside a process of **Sustainability Appraisal (SA)**, a legally required process that aims to ensure that the significant effects of an emerging draft plan (and alternatives) are systematically considered and communicated. It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations (the ‘SEA Regulations’) 2004.

1.2.2 The aim of **this SA Report Addendum** is essentially to present information on the further proposed modifications, and reasonable alternatives, with a view to informing the current consultation and subsequent plan finalisation.

#### Structure of this report

1.2.3 In order to achieve this aim, this SA Report Addendum sets out to answer three questions:

1. What has plan-making / SA involved **up to this point**?
  - particularly in terms of the consideration given to reasonable alternatives.
1. What are the SA findings **at this stage**?
  - i.e. in relation to further proposed modifications.
2. What happens **next**?

N.B. this is an SA Report ‘Addendum’ on the basis that it is an addendum to the SA Report published in 2017 / submitted in 2018. The focus of this report is further proposed modifications, as opposed to the plan as a whole (the remit of the SA Report).<sup>3</sup> This is the second SA Report Addendum to have been published, following the SA Report Addendum 2019.

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<sup>3</sup> Whilst the focus of this report is on further proposed modifications (and alternatives), there is a need to bear in mind that the further proposed modifications will (if taken forward) be implemented alongside the rest of the Local Plan, i.e. those parts of the plan not the focus of further proposed modifications. For this reason, explicit consideration is also given to the effects of the Local Plan as modified (i.e. the cumulative effects of the further proposed modifications and the rest of the Local Plan as submitted, also taking account of the 2019 proposed modifications).

## 2 WHAT IS THE PLAN SEEKING TO ACHIEVE?

2.1.1 The aim here is to provide a brief introduction to VALP (albeit mindful that the focus of this report is *further proposed modifications*, as discussed above).

### 2.2 VALP objectives

2.2.1 The broad aim of VALP is to allocate land for development, present policies (district-wide and site-specific) to guide future planning applications and ultimately provide a planning framework for the district up to 2033. The plan objectives (abridged) are as follows:

- Meet the needs of new and existing residents through a flexible and pro-active approach to **sustainable development** which includes a combination of new allocations, more intensive use or conversion of existing built sites and protection of sensitive areas.
- Provide for **housing needs**, including unmet needs from elsewhere if appropriate, which will include: affordable housing to meet identified needs; a mix of house sizes and types to meet identified needs; and specific accommodation to meet the needs of an ageing population and those with special housing needs, including the traveller population.
- Work with partners to secure timely and well-located provision of the **infrastructure**, services and facilities needed to sustain and enhance existing and new communities including: education, training and community facilities; transport infrastructure including enhanced public transport, (both rail and bus), traffic management, cycling and walking to promote a shift to more sustainable choices; telecommunications including broadband in remote areas; police, fire and ambulance services; green infrastructure and sport, recreational and cultural facilities; utilities, and social care and health infrastructure.
- Development will be **distributed** across Aylesbury Vale taking a capacity-led approach. It is also an Aylesbury Garden Town first approach. Therefore the main focus of development will be at Aylesbury Garden Town. The remainder of housing will then be located at Buckingham, Haddenham, Winslow, Wendover and the north east of Aylesbury Vale adjacent to Milton Keynes together with an appropriate level of development at the most sustainable settlements in the rural areas.
- Protect and enhance the district's **towns, local centres and villages** (see Figure 2.1) including through protection and enhancement of local services and local distinctiveness.
- Manage development in a way that ensures the protection and enhancement of the district's built, natural and historic **environment**, as well as its landscape and biodiversity. Planning positively for biodiversity and green infrastructure, minimise development on high-quality agricultural land, and require high-quality design and building at appropriate densities.
- Manage development in a way that ensures that **climate change** is adapted to and mitigated against, including: no built development to take place in the functional floodplain other than for essential strategic infrastructure; effective flood protection including more effective use of multi-functional green spaces which can assist in flood control; support for sustainable waste management; provision for the generation and use of decentralised low carbon heat and power; and building to high standards of construction and design.
- Promote provision of, and support for, measures and initiatives that strengthen the quality of life for new and existing residents of the district and address pockets of deprivation and health **inequalities** especially within Aylesbury town.

### 2.3 What is VALP not seeking to achieve?

2.3.1 It is important to emphasise that the plan will be strategic in nature. Even the allocation of sites / establishment of site-specific policy through VALP should also be considered a strategic undertaking, i.e. a process that omits consideration of some detailed issues, in the knowledge that these will be clarified and addressed at the planning application stage. The strategic nature of VALP is reflected in the scope of the SA.

**3 WHAT’S THE SCOPE OF THE SA?**

3.1.1 The scope of SA work is introduced in detail within the SA Report (2017). Essentially, the scope is reflected in a list of sustainability objectives, and associated issues, which collectively provide a methodological ‘framework’ for appraisal - see **Table 3.1**.

Table 3.1: The SA framework

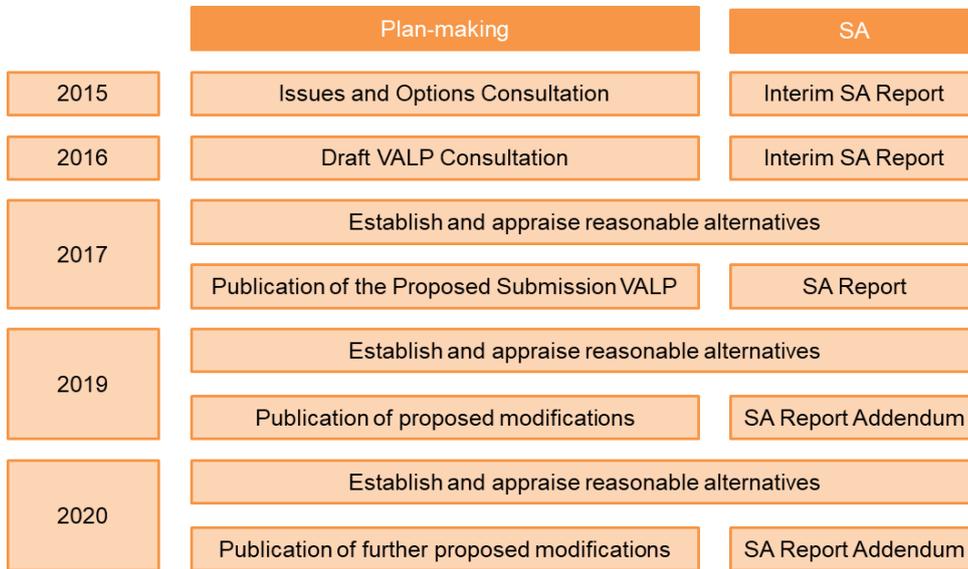
Sustainability objective	Sustainability issues
1. Protect, enhance and manage <b>biodiversity</b> and geodiversity	<ul style="list-style-type: none"> <li>Internally and nationally designated sites</li> <li>Locally designated sites</li> <li>Biodiversity at the landscape scale</li> </ul>
2. Minimise the district's contribution to <b>climate change</b> ('mitigation')	<ul style="list-style-type: none"> <li>Emissions from transport</li> <li>Emissions from the built environment</li> </ul>
3. Plan for the anticipated levels of <b>climate change</b> ('adaptation')	<ul style="list-style-type: none"> <li>Increased flood risk</li> <li>Water resources</li> </ul>
4. Safeguard and improve <b>community</b> , health, safety and well-being.	<ul style="list-style-type: none"> <li>Community, health, sport and leisure facilities</li> <li>Open space and green infrastructure</li> <li>Needs of the ageing population</li> </ul>
5. Develop a dynamic, diverse and knowledge-based <b>economy</b> that excels in innovation with higher value, lower impact activities.	<ul style="list-style-type: none"> <li>Employment land to meet the varying needs of businesses.</li> </ul>
6. Protect, enhance and manage sites, features and areas of historical, cultural <b>heritage</b> and archaeological importance	<ul style="list-style-type: none"> <li>Designated assets/areas and their settings</li> <li>Non-designated assets/areas and their settings</li> </ul>
7. Provide affordable and good quality <b>housing</b> for all.	<ul style="list-style-type: none"> <li>Objectively assessed housing needs</li> <li>Mix of types and tenures</li> <li>Specialist housing needs</li> </ul>
8. Protect, enhance and manage the character and appearance of the <b>landscape</b> and townscape, maintaining and strengthening distinctiveness and its special qualities	<ul style="list-style-type: none"> <li>Chilterns AONB</li> <li>Locally important landscapes</li> <li>Character of the wider countryside</li> <li>Townscapes and sensitive settlement edges.</li> </ul>
9. Protect and conserve <b>natural resources</b>	<ul style="list-style-type: none"> <li>Best and most versatile agricultural land</li> <li>Remediation of contaminated land</li> <li>Mineral deposits</li> </ul>
10. Reduce air, soil and water <b>pollution</b>	<ul style="list-style-type: none"> <li>Point source and diffuse pollution</li> <li>Pollution hotspots, including AQMAs</li> </ul>
11. Increase the proportion of travel by sustainable modes, reduce the need to travel and improve the efficiency of <b>transport</b> networks	<ul style="list-style-type: none"> <li>Walking, cycling and public transport</li> <li>Traffic congestion hotspots</li> <li>Infrastructure upgrades</li> </ul>
12. Reduce <b>waste</b> generation and disposal, and achieve the sustainable management of waste	<ul style="list-style-type: none"> <li>Local and strategic facilities for waste separation, recycling and recovery.</li> </ul>

**PART 1: WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT?**

**4 INTRODUCTION**

4.1.1 The Local Plan-making / SA process has been ongoing for several years, as explained within Part 1 of the SA Report (2018) and summarised in Figure 4.1.

*Figure 4.1: Overview of the VALP plan-making / SA process*



4.1.2 At the current time, rather than recap the whole story, there is a need to explain the work undertaken in 2020 ahead of finalising further proposed modifications.

4.1.3 Specifically, in-line with regulatory requirements, there is a need to explain work to develop and then appraise **reasonable alternatives**, and how the Council then took account of appraisal findings when determining a preferred approach.

**Reasonable alternatives in relation to what?**

4.1.4 There is a need to revisit quite a wide range of VALP elements through further proposed modifications; however, it does not follow that there is a need to formally give consideration to reasonable alternatives (RAs) ahead of each and every decision on a further proposed modification. Rather, there is a need to explore RAs where there is a choice between alternative policy approaches that represent genuinely different strategies, and where there is the likelihood of being able to differentiate the RAs in terms of ‘significant effects’.

4.1.5 Work to explore RAs in **2017** ahead of preparing the VALP for publication and submission, as reported in the SA Report (2017), focused exclusively on the ‘spatial strategy’, i.e. the approach taken to the allocation of sites to meet objectively assessed development needs (primarily housing). There is no reason to suggest that this approach was in any way unreasonable, with the Inspector stating within his Interim Findings (August 2018) that: *“I consider that the Sustainability Appraisal has been adequate so far...”*

4.1.6 Subsequently, in **2019**, work to explore RAs ahead of preparing further proposed modifications, as reported in the SA Report Addendum (2019), again focused exclusively on the ‘spatial strategy’, specifically the approach taken to the allocation of additional land on the edge of Milton Keynes to provide for in the region of 1,100 homes. Close consideration was also given to the possibility of exploring alternatives in respect of allocating additional land for C2 older persons accommodation through new Policy H6B (see Box 4.1 of the 2019 SA Report Addendum),<sup>4</sup> but ultimately it was decided that there were no reasonable alternatives warranting appraisal.

<sup>4</sup> As opposed to housing for the wider population at large, which falls under the C3 planning use class.

- 4.1.7 In **2020**, ahead of finalising further proposed modifications, the decision was taken to focus on reasonable alternative approaches to allocating sites through **Policy H6b** in order to meet the established need for C2 older persons housing provision, essentially because this is a key issue to be addressed through further proposed modifications. The Buckinghamshire Housing and Economic Development Needs Assessment (HEDNA) identified that there is a significant need for new older persons' housing in the District, and hence there is a need for the VALP to proactively respond via allocation of sites (although there is also a role for windfall schemes aided by suitably permissive policy). The October 2019 Modified VALP responded proactively through the introduction of Policy H6b, with the policy proposing three allocations; however, issues have arisen in 2020 which lead to a need to revisit the policy and its allocations.<sup>5</sup>

#### Structure of this part of the report

- 4.1.8 This part of the report is structured as follows:

- Chapter 5** - explains the reasons for **selecting the alternatives** dealt with
- Chapter 6** - presents an **appraisal** of the reasonable alternatives
- Chapter 7** - explains reasons for **selecting the preferred option**

#### Who's responsibility?

- 4.1.9 It is important to be clear that:

- Selecting reasonable alternatives - is the responsibility of the plan-maker (i.e. officers), with AECOM acting in an advisory capacity.
- Appraising the reasonable alternatives - is the responsibility of AECOM.
- Selecting the preferred option - is the responsibility of the plan-maker.

## 5 SELECTING REASONABLE ALTERNATIVES

### 5.1 Introduction

- 5.1.1 The aim here is to explain the work undertaken in 2020 to establish reasonable alternative approaches to the allocation of sites for C2 accommodation through Policy H6B. This is explained as a broadly three step process:

- 1) Explore strategic ('top-down') issues / options.
- 2) Explore detailed ('bottom-up') options, i.e. the sites in contention for allocation.
- 3) Establish reasonable alternatives on the basis of (1) and (2).

### 5.2 High-level issues / options

- 5.2.1 This section discusses:

- Quanta - i.e. the number of C2 units for which provision must be made through Policy H6b allocations; and
- Broad distribution and site selection principles.

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<sup>5</sup> To elaborate further, it was considered reasonable to focus attention on the matter of allocating sites through Policy H6B because it was determined (by the Council and AECOM in discussion) likely that reasonable alternatives could be established which could, in turn, be differentiated in terms of 'significant effects' through appraisal. It is clear from the SEA Regulations and from the Government's Planning Practice Guidance that SA should focus on aspects of plans likely to give rise to significant effects.

Quanta

- 5.2.2 The demographic projections in the Buckinghamshire Housing and Economic Development Needs Assessment (HEDNA) show that the population of Buckinghamshire is likely to increase by between 64,700 and 73,700 people over the 20-year period 2013-2033. The number of people aged 75 or over is projected to increase by around 32,100, equating to approximately around half of the total projected growth.
- 5.2.3 As set out at paragraph 50 of the NPPF (2012), local planning authorities should plan for a mix of housing to meet the needs of different groups in the community including older people. It follows that there is a significant need for older persons housing to be met through the VALP.
- 5.2.4 The HEDNA 2016 identifies need for housing for older people in Aylesbury Vale across several categories. The next step is to match the categories of need to the two planning use classes in question, namely C2 (residential institutions) and C3 (residential dwelling house). Table 4.1 provides an overview, with further detail provided within the VALP.

Table 5.1: Categories of older persons housing

Category	Use class
Retirement accommodation	Typically C3
Conventional sheltered housing	Typically C3
Enhanced sheltered housing	C2
Extra care sheltered housing	C2
Registered care home	C2

- 5.2.5 The focus here is on ensuring sufficient supply of land to meet needs for C2 use class, which amounts to **1,930 units** over the plan period (2013 to 2033). A detailed explanation for this figure is presented within the VALP.
- 5.2.6 718 C2 units have already been provided since the start of the plan period ('completions') or are set to be provided at sites either with planning permission or allocated in a 'made' (i.e. adopted) neighbourhood plan ('commitments') as of 31<sup>st</sup> March 2020, leaving a shortfall of 1,212 units to be provided for the 13 remaining years of the plan period (1<sup>st</sup> April 2020 to 31<sup>st</sup> March 2033), which equates to an annual requirement of 93 units.
- 5.2.7 However, in line with paragraph 47 of the NPPF (2012), there is not a requirement to allocate sites to meet the annual requirement for the entire plan period. Rather, there is a need to allocate sites sufficient to meet needs for years 1-5 (2020-2025), with broad locations identified and a planning policy framework in place to address need for remaining part of the plan period (2025 to 2033). Policy H6B of the October 2019 Modified VALP identifies several broad locations in which windfall C2 schemes could be sited.
- 5.2.8 As such, Policy H6b allocations must ideally provide for **465 units** over the period 2020 to 2025 (93 home annual requirement x five years).

Broad distribution and site selection principles

- 5.2.9 There is limited guidance on broad distribution and site selection principles for C2 older persons accommodation; however, it is possible to cautiously make the following high-level points:
  - There is a need to support a relatively even distribution of C2 accommodation across the District (also mindful of sites in neighbouring authorities), in line with the spread of population. However, there is no evidence to suggest any current spatial imbalance (i.e. an over-concentration in an area, or a deficiency in an area) available to inform site selection.

- Schemes are typically multi-storey, which limits the amount of land that is required, but can give rise to landscape and visual issues. There will also typically be limited need for car parking spaces, with a low ratio of spaces per resident (car clubs can be appropriate) plus spaces for staff and visitors. There will also be communal open space, as opposed to private gardens, which again limits the amount of land that is required.
- Accessibility to and from sites by public transport is an important consideration, as is the ability to walk to services and facilities. Again, this is a consideration for staff, visitors and residents. Equally, integration with existing communities is preferable to isolated schemes.
- The provision of older persons C2 accommodation also has an employment element, and so may be a good alternative use for employment land, subject to site-specific considerations, including in respect of amenity and other factors discussed above.
- C2 schemes can be delivered in a retirement village format with C3 independent living the main provision but a care facility on site as well. Such schemes give rise to particular locational considerations.

### 5.3 Site options

5.3.1 There are broadly two categories of allocation option:

- Existing allocation options; and
- New allocation options.

#### *Existing allocation options*

5.3.2 Three sites are allocated by Policy H6b of the Modified VALP (2019). However, one of those sites (WIN020; 100 units) is now understood to be non-deliverable and hence must be removed from the VALP, and need not be considered further here.<sup>6</sup>

5.3.3 The other two existing Policy H6b allocations are broadly supported at the current time, in light of consultation responses received, and can be safely 'rolled forward' as preferred options for further consultation, i.e. allocation can be assumed as a 'given' for the purposes of establishing reasonable alternatives at the current time. However, the yield of one of these sites is now understood to be two units fewer than was previously thought to be the case.

5.3.4 In summary, two options should be taken forward to the reasonable alternatives:

- WHA001 - Shenley Road, Whaddon (Shenley Park) – 110 units
- Adjacent to Tesco, Tring Road, Aylesbury – 58 units

#### *New allocation options*

5.3.5 A first port of call is **Land adjacent to Martin Dalby Way/Paradise Orchard Roundabout, Berryfields**. A 12 unit scheme is committed, in that it benefits from a "resolution to grant planning permission subject to a S106 agreement" (19/02210/APP). It needs an allocation in the VALP only because the 'resolution to grant' was made subsequent to 31<sup>st</sup> March 2020.

5.3.6 The second port of call is **Land north of Aston Clinton Road, Weston Turville (care home)**. This site falls within a wider site that was granted outline planning permission in 2017 (15/03806/AOP) for a 400 home mixed use scheme including "C2 / C3" extra care housing. The assumption at the time of preparing the Modified VALP (2019) was that the scheme would deliver 80 C2 units; however, a detailed ('reserved matters') application has now been submitted proposing 85 units (20/00530/ADP). As such, allocation through the VALP would secure an additional five units over-and-above the 80 units already counted as commitments.

<sup>6</sup> C2 allocation is not supported by the landowner or parish council. Whilst the site is currently allocated for employment uses, it is anticipated that it will be reallocated for sports facilities through a review of the Winslow Neighbourhood Plan.

- 5.3.7 The third port of call is **Land at the Winslow Centre, Winslow**. This site is owned by Buckinghamshire Council, and part of it is allocated in the made Winslow Neighbourhood Plan (2014) for 30 extra care units, with these units already counting towards meeting the established need for C2 units over the plan period. However, the Council now supports a scheme involving 83 units, as one component of a wider proposed scheme for the Winslow Centre, to address the issue of outdated facilities onsite. This scheme was agreed by Cabinet in September 2020 and is supported by the Parish Council. There is clear merit to the scheme on this basis, and recognising that the site is located within walking distance of Winslow town centre and the committed new railway station; however, there is a need to strike a note of caution as the new proposed scheme will extend beyond the existing allocated site, which comprises existing buildings, to take-in local green space designated by the Winslow Neighbourhood Plan. Specifically, the new proposal consists of a 60 bed care facility which will utilise the existing buildings at the Winslow Centre and a further 23 units of assisted living on local green space. Allocation of the larger site through the VALP would secure the supply of an additional 53 units over-and-above the 30 units already counted as commitments.
- 5.3.8 The remaining four site options are uncommitted. These are *introduced* below in order of scale:
- **Bartletts Residential Home, Peverel Court, Portway Road, Stone** – a full planning application was submitted in May 2020 for a proposal which would provide 12 extra beds at the existing Bartletts Residential Home. The application is currently pending consideration and consultees have requested further information.
  - **Mandeville Grange, Wendover Road, Stoke Mandeville** – planning permission was granted in 2010 for the Mandeville Grange Nursing Home to provide 16 units through a single storey extension onto land currently comprising gardens; however, the permission was not implemented. The landowners now propose a revised scheme of 34 units through a two storey extension; however, it is more appropriate here to focus attention on the option of a 16 unit extension only, as this option has been considered through the planning application process.
  - **Leys House, Whaddon Road, Newton Longville** – would involve a 60 bed care home along with around 10 to 12 C3 homes on a site that currently sits within open countryside, between Newton Longville and the southern edge of Milton Keynes, but which is set to be enveloped by the committed 1,855 home Salden Chase scheme (15/00314/AOP). Materials relating to the scheme have recently been submitted as part of pre-application discussions.
  - **Fremantle Court, Risborough Rd, Stoke Mandeville** – this is a proposed extension to an existing care home located c.1 km to the south of Stoke Mandeville (although a committed 74 home scheme is set to bring the southern edge of the village closer). The proposal, which has been submitted as part of representations on the VALP, consists of between 100 and 140 units on land to the north west of the existing care home, with the potential for 50 units in a later phase to the south east. The scheme is remote from any settlement and will also become further separated from Stoke Mandeville by the severing of Risborough Road due to HS2.
- 5.3.9 The final option to note here is the option of delivering an older person's accommodation scheme as part of the aforementioned committed 1,855 home Salden Chase scheme (15/00314/AOP). A proposed amendment has been submitted to modify application 15/00314/AOP to include provision of older persons' accommodation; however, the proposal is for a C3 use class scheme not C2, and so cannot be considered as an allocation in Policy H6b. This is therefore an **unreasonable option** and is not considered further in this report.
- 5.3.10 **Appendix I** of this report presents further information on the seven new allocation options.

**5.4 What are the reasonable alternatives?**

5.4.1 The above discussion, including the analysis of new site options presented in Appendix I, leads to the following conclusions (N.B. conclusions reached jointly by Council officers and AECOM):

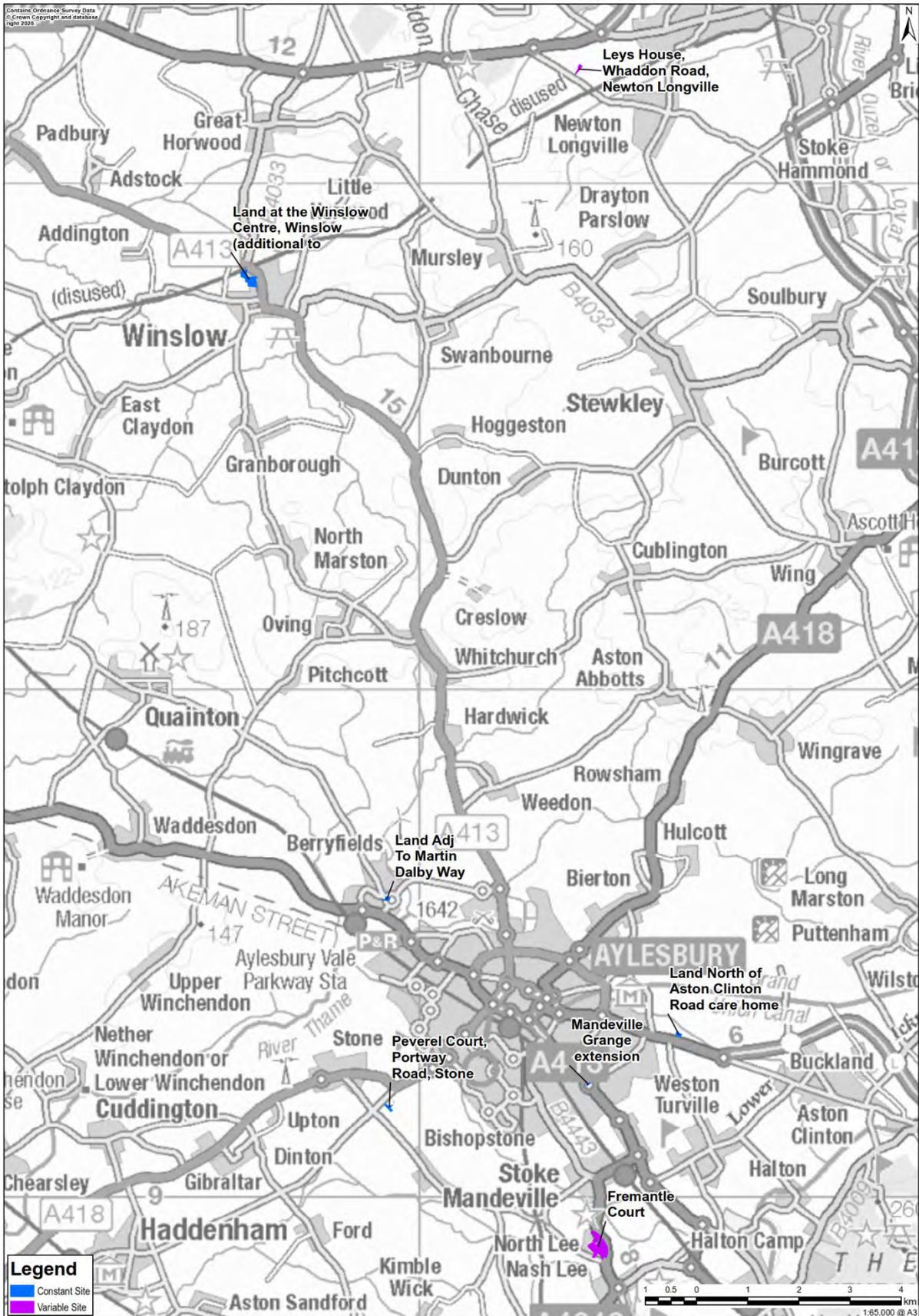
- The two existing allocations (i.e. the allocations published for consultation in 2019) should be held **constant** across the reasonable alternatives (RAs).
- Four of the new allocation options - Land at the Winslow Centre, Winslow; Mandeville Grange Nursing Home, Wendover Road, Stoke Mandeville; Land adj to Martin Dalby Way/Paradise Orchard, Berryfields; Land north of Aston Clinton Road, Weston Turville (care home) - give rise to limited planning and sustainability concerns, and hence can reasonably be held **constant** across the RAs.
- One of the new allocation options - Bartletts Residential Home, Peverel Court, Portway Road, Stone – give rise to a degree of concern, in certain respects, but on balance can reasonably be held **constant** across the RAs, noting the stretching nature of the target figure (465 units).
- Two of the new allocation options – Leys House, Whaddon Road, Newton Longville; and Fremantle Court, Risborough Rd, Stoke Mandeville – are less well located, and hence should be a **variable** across the reasonable alternatives.

5.4.2 In light of these points, Table 5.1 presents the reasonable alternatives, highlighting the two sites that are a variable (darker blue rows), with these two sites further highlighted in Figure 5.1.

*Table 5.1: Reasonable alternative approaches to C2 allocation (with variables highlighted)*

Source of supply		# units			
		Option 1	Option 2	Option 3	Option 4
Allocations published within the Modified VALP (2019)		168	168	168	168
New allocations	Land north of Aston Clinton Road, Weston Turville (care home)	5	5	5	5
	Bartletts Residential Home, Peverel Court, Portway Road, Stone	12	12	12	12
	Mandeville Grange Nursing Home, Wendover Road, Stoke Mandeville	16	16	16	16
	Land at the Winslow Centre, Winslow	53	53	53	53
	Land adjacent to Martin Dalby Way/Paradise Orchard, Berryfields	60	60	60	60
	Leys House, Whaddon Road, Newton Longville	-	60	-	60
	Fremantle Court, Risborough Rd, Stoke Mandeville	-	-	100+	100+
<b>Total supply</b>		<b>314</b>	<b>374</b>	<b>414+</b>	<b>474+</b>
<b># units above/below requirement (465 units)</b>		<b>-151</b>	<b>-91</b>	<b>-51</b>	<b>+9</b>

Figure 5.1: Site options that feature in the reasonable alternatives (both constants and variables)



## 6 APPRAISING REASONABLE ALTERNATIVES

### 6.1 Introduction

6.1.1 This section presents an appraisal of the reasonable alternatives introduced above.

### 6.2 Appraisal methodology

6.2.1 The appraisal table below comprises 12 rows - one for each of the sustainability topics that make up the SA framework (see Table 3.1). Within each row the alternatives are:

- ranked in order of relative performance (with ' = ' used to denote instances where the alternatives are judged to perform on a par); and
- categorised in terms of potential to result in 'significant effects' on the baseline situation (or 'no VALP' scenario), with: **red** used to signify a significant negative effect; **amber** an effect that is notably negative but not judged to be significant; **light green** an effect that is notably positive, but not judged to be significant; and **dark green** a significant positive effect.

6.2.2 Every effort is made to predict effects accurately; however, this is inherently challenging given uncertainty regarding how policy will be implemented in practice. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). In light of this, there is a need to make considerable assumptions regarding how policy will be implemented 'on the ground' and what the effect on particular receptors will be. Assumptions are made explicit in the appraisal text as far as reasonably possible, whilst balancing the need for conciseness and readability.

6.2.3 Where it is not possible to categorise performance with confidence (on the basis of reasonable assumptions), efforts are made to comment on the relative merits of the alternatives in more general terms. This is helpful, as the aim of the appraisal is to differentiate between the alternatives as well as reach conclusions on the performance of each option in isolation.

6.2.4 It is also important to note that effects are predicted taking into account the criteria presented within Schedules I and II of the Environmental Assessment of Plans and Programmes (SEA) Regulations [2004]. So, for example, account is taken of the duration, frequency and reversibility of effects. Cumulative effects are also considered (i.e. effects resulting from the VALP proposals in combination with other on-going or planned activity).

### 6.3 Appraisal findings

6.3.1 **Table 6.1** presents appraisal findings in relation to the alternatives introduced above.

Table 6.1: Appraisal of reasonable alternative approaches to C2 allocation through Policy H6b

Topic	Rank of performance / categorisation of effects			
	Option 1: 314 units	Option 2: 374 units	Option 3: 414 units	Option 4: 474 units
Biodiversity	★1	2	★1	2
Climate change adaptation	=	=	=	=
Climate change mitigation	★1	★1	2	2
Community	2	2	★1	★1
Economy	4	3	2	★1
Heritage	=	=	=	=
Housing	4	3	2	★1
Landscape	★1	3	2	4
Natural resources	=	=		
Pollution	=	=		
Transport	★1	★1	2	2
Waste	=	=	=	=

**Discussion**

Option 1 stands out as performing well in respect of greatest number of topics; however, it does not necessarily follow that it performs best overall, noting that it performs poorly in respect of three topics (and given that this appraisal does not assign weight to the topics, nor assume that the topics have equal weight). Having made these initial points, the following bullet points consider each of the SA topics in turn (drawing on evidence and discussion of site-specific issues/opportunities set out in Appendix I).

Topic	Rank of performance / categorisation of effects			
	Option 1: 314 units	Option 2: 374 units	Option 3: 414 units	Option 4: 474 units
<ul style="list-style-type: none"> <li>• Biodiversity – there are notable sensitivities associated with “Leys House” (Options 2 and 4), with this standing-out as the most constrained of the site options currently in contention for allocation. There are also sensitivities associated with “Fremantle Court” (Options 3 and 4); however, the proposal to deliver a nature reserve as part of the proposed scheme is of note (and is assumed to be a firm proposal). On this basis, Options 2 and 4 are judged to perform relatively poorly; however, significant negative effects are not predicted (with this conclusion reached taking account of sensitivities associated with two of the sites that are a constant across the RAs, namely “Mandeville Grange” and “Bartletts”).</li> <li>• Climate change adaptation – flood risk is the key consideration here, but is not a constraint to development at either of the sites that are a variable across the alternatives. With regards to the sites that are held constant across the RAs, one site gives rise to a degree of concern (Mandeville Grange Nursing Home, Wendover Road, Stoke Mandeville); however, significant negative effects are not predicted.</li> <li>• Climate change mitigation - there are concerns in respect of emissions from transport associated with Freemantle Court (Options 3 and 4), and whilst the proposal to deliver a ‘net zero’ emissions scheme (without offsetting) is of note, it must be assigned limited weight as part of this appraisal, as it is potentially subject to change. With regards to Leys House (Options 2 and 4), there is potentially a degree of opportunity, in respect of supporting delivery of a heat network; however, this is highly uncertain. On this basis, it is challenging to differentiate the alternatives, but Options 3 and 4 are judged to perform relatively poorly on balance. Significant effects are not predicted, also taking account of the sites that are a constant across the alternatives, which do not give rise to any notable issues or opportunities.</li> <li>• Community – the proposed scheme for Freemantle Court (Options 3 and 4) involves delivery of a new nature reserve and modest new community facilities (and these are assumed to be firm proposals). With regards to the sites that are held constant across the RAs, there is potentially a degree of opportunity associated with Land at the Winslow Centre, Winslow. In conclusion, Options 3 and 4 perform well, but significant positive effects are not predicted, recalling the localised nature of benefits that would accrue.</li> <li>• Economy – Option 4 is preferable as it will lead to additional new employment; however, significant effects are not predicted on balance, given the scale of new employment opportunity in question.</li> <li>• Heritage – there are limited sensitivities associated with any of the sites in question, as discussed in Appendix I. As such, the alternatives are judged to perform on a par and significant effects not predicted.</li> <li>• Housing - Option 4 performs well as the C2 provision target would be met. The proposed supply buffer is small (9 units), such that unforeseen delays to delivery at any one of the proposed allocations could potentially lead to a shortfall against the target; however, concerns are allayed by the likelihood of additional windfall supply. Options 2 and 3 involve a shortfall against the target; however, significant negative effects are not predicted as there would be a strong possibility of the shortfall being addressed by one or more windfall schemes. As for Option 1, it seems unlikely that the target figure would be met in practice (even with windfall), hence significant negative effects are predicted.</li> <li>• Landscape - there are sensitivities associated with both of the sites that are variables across the alternatives, and this is particularly the case for “Leys House”. This suggests that Options 2 and 4 perform relatively poorly. Landscape impacts under these two options would be experienced by the new community at the committed Salden Chase strategic urban extension and potentially also those accessing the open countryside to the southwest (accessible via a bridleway); however, effects would nonetheless be localised in the context of the plan area, hence significant negative effects are not predicted. Two of the sites that are a constant across the alternatives also give rise to a modest degree of concern.</li> <li>• Transport – there are notable highways concerns associated with Freemantle Court; however, there is good potential for mitigation, as discussed in Appendix I. None of the other sites in question give rise to any notable concern. On this basis, significant negative effects are not predicted.</li> <li>• Natural resources, pollution and waste – no issues / opportunities / impacts of note.</li> </ul> <p>It is for the Council to give consideration to these appraisal findings when selecting a preferred option, assigning weight to the topics and explaining any necessary trade-offs – see discussion below.</p>				

**7 DEVELOPING THE PREFERRED APPROACH****7.1 Introduction**

7.1.1 The aim of this section is to present Council officers' 'outline reasons' for selecting the preferred option (Option 3) in light of the alternatives appraisal presented above.

**7.2 Reasons for supporting the preferred option**

7.2.1 Council officers have provided the following text:

The council can meet its C2 5-year requirement if all sites assessed herein are allocated. However, if two of the sites, Fremantle Court and Leys House, were to be allocated they would have negative impacts as set out above. The key decision is whether the two sites can be included without incurring unacceptable impacts. Although Fremantle Court performs relatively poorly against some indicators, particularly climate change, landscape and transport, it is considered that the need for C2 accommodation weighs strongly in favour of option 3. Also, the negative effects of including Fremantle Court can be offset by specific requirements in the policy which will limit the negative impacts. It is noted that option 5 including Leys House performs best against the housing factor, but it is considered that unlike Fremantle Court it is not possible to mitigate the impacts of including the site and its inclusion cannot be justified. Option 3 is therefore preferred, and the council accepts that the C2 5-year housing requirement cannot be met from the options available without incurring an unacceptable impact. It is expected that planning permissions will quickly resolve the shortfall.

## **PART 2: WHAT ARE SA FINDINGS AT THIS CURRENT STAGE?**

## 8 INTRODUCTION

- 8.1.1 The aim of this part of the report is to present appraisal findings in relation to the further proposed modifications (to the plan as submitted) that are currently published for consultation.
- 8.1.2 Before presenting the appraisal, there is firstly a need to discuss: A) methodology; and B) a process of 'screening-out' those further proposed modifications that do not need to be a focus of the appraisal as they do not give rise to any potential for significant effects, either alone or in combination with other further proposed modifications or other parts of the plan.

### 8.2 Methodology

- 8.2.1 The appraisal identifies and evaluates 'likely significant effects' of further proposed modifications on the baseline, drawing on the sustainability topics identified through scoping (see Table 3.1) as a methodological framework.
- 8.2.2 The focus of the appraisal is on the **further proposed modifications** (given that it is the proposed modifications that are currently the focus of consultation); however, explicit consideration is also given to the effects of **the Local Plan as modified** (i.e. the cumulative effects of the proposed modifications and the rest of the Local Plan as submitted, also taking account of the 2019 proposed modifications).
- 8.2.3 Every effort is made to predict effects accurately; however, this is inherently challenging given the high-level nature of the policy approaches under consideration and understanding of the baseline. Given uncertainties there is inevitably a need to make assumptions, e.g. in relation to plan implementation and which/how aspects of the baseline would be impacted.
- 8.2.4 Assumptions are made cautiously and explained within the text. The aim is to strike a balance between comprehensiveness and conciseness/accessibility to the non-specialist. In many instances, given reasonable assumptions, it is not possible to predict significant effects, but it is possible to comment on effects in more general terms.
- 8.2.5 It is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations.<sup>7</sup> So, for example, account is taken of the probability, duration, frequency and reversibility of effects as appropriate. Cumulative effects are also considered, i.e. effects that become apparent once the effects of the further proposed modifications / the submission plan plus modifications are considered in a wider context.

### 8.3 Screening the proposed modifications

- 8.3.1 Council Officers and AECOM considered the 107 further proposed modifications and determined that the appraisal should focus on the following:
- FMM015 – correction to RAF Halton closing date in policy S2
  - FMM026 – amendment to AGT1 Aylesbury South policy requirements including removal of specific amount of retail floorspace provision
  - FMM030 – clarify policy AGT2 South West Aylesbury including education provision
  - FMM033 – amendments to description of site allocation requirements in AGT3 north of A41 Aylesbury as a result of changes to the use class orders
  - FMM036 – correction of name of link road in AGT4 south of A41 Aylesbury site allocation
  - FMM058 – Shenley Park site allocation - amendment to criterion f to clarify landscape/green infrastructure requirements, amendment to criterion o to add more detail about detailed traffic modelling, amendment to criterion p to mention specific schemes, amendment to criterion q to mention specific bridleways, amendment to criterion v to include reference to consultation with the water and sewerage undertaker

<sup>7</sup> Environmental Assessment of Plans and Programmes Regulations 2004

- FMM059 – amendment to criterion j of BUC043 site allocation policy to include reference to consultation with the water and sewerage undertaker
- FMM072 – inclusion of phrase ‘at least’ to policy MMO006
- FMM076 – deletion of supporting text in para 4.157 relating to exceptions (text remains in policy itself)
- FMM077 – amendment to wording in policy D3 to make consistent with supporting text, and inclusion of reference to Class Q
- FMM078 to FMM084 – changes to Policy H6B (Housing for older people) and supporting text
- FMM085 – deletion of criterion b in policy E5 town centres as this is covered by the NPPF
- FMM086 – inclusion of new supporting text to introduce the new use class order
- FMM087 – Updates to shop and business frontages policy E6 to reflect new UCO
- FMM088 – amendment to text to clarify that policy E7 doesn’t relate to tourist accommodation proposals
- FMM089 - Modify policy T3 to incorporate infrastructure that has been tested, is required, and is subject to known delivery mechanisms. The most significant changes are deletion of two of the Aylesbury link roads as these are aspirational schemes rather than required schemes
- FMM090 – modify policy T4 specifically the thresholds for transport assessments for different proposals in response to changes to the UCO
- FMM091 – amended policy T8 requirements relating to electric vehicle charging
- FMM092 – amend policy BE1 Heritage Assets to require heritage statement in some circumstances
- FMM093 – amend policy BE3 Protection of Amenity of Residents as some words were missing and the intention of the policy was reversed
- FMM094 – amend supporting text to give more detail about Biodiversity SPD
- FMM095 – amend supporting text to add detail about the methodology to determine the quantitative ecological impact of any development until the Biodiversity SPD is adopted
- FMM096 – amendments to policy NE1 Biodiversity and Geodiversity to clarify/add detail
- FMM097 – amend policy C1 Conversion of Rural Buildings to align with para 10.11
- FMM098 – amend supporting text to clarify definition of green infrastructure
- FMM099 – amend supporting text to include the whole title of a supporting document and explanation of what that document does
- FMM100 – amend policy I1 Green Infrastructure to explain aims more fully
- FMM101 – amend policy I2 Sports and Recreation to clarify size threshold
- FMM102 – amend policy I3 Community Facilities to clarify size threshold
- FMM103 – amend policy I4 Flooding to clarify the requirements including new criterion relating to modelling of ordinary watercourses
- FMM104 – update glossary to clarify evidence base for individual town centre boundaries
- FMM105 – update parking standards appendix to reflect new use class orders.

8.3.2 These further proposed modifications are discussed as part of the appraisal presented below.

*Box 8.1: A note non changes to Policy S2 Spatial strategy for growth*

FMM015 sets out changes to changes to the number of homes set to be delivered at various locations in the plan area over the plan period. In particular, there is an increased number of homes set to be delivered at larger villages and medium villages. However, all these changes reflect latest understanding of the number of homes supported through planning permissions, rather than changes made through the VALP. As such, there are no policy choices to explore through this appraisal.

## 9 APPRAISAL OF FURTHER PROPOSED MODIFICATIONS

### 9.1 Introduction

9.1.1 This section presents an appraisal of the screened-in further proposed modifications. The appraisal is presented below under the SA framework (see Table 3.1), before a final section presents conclusions and considers the cumulative effects of the further proposed modifications alongside aspects of the Modified VALP (2019) not the focus of further proposed modifications.

### 9.2 Biodiversity

#### Discussion of further proposed modifications

9.2.1 The primary consideration is the proposed strategy in respect of new allocations for **C2** older persons accommodation, as discussed in Section 6 of this report. The conclusion is that the preferred option performs well relative to alternatives; however, there are sensitivities associated with three of the proposed allocations (Fremantle Court, Mandeville Grange and Bartletts), as discussed further in Appendix I.

9.2.2 A second consideration relates to FMM058, which deals with **Policy WHA001** (Shenley Park; as proposed in 2019). One of the current proposals is to amend criterion (f) to add a new emphasis on green infrastructure, which should serve to ensure that necessary work is completed to identify green infrastructure issues and opportunities, which are then a prominent input to masterplanning and design. This is strongly supported, from a biodiversity perspective, recognising that the site falls within a Biodiversity Opportunity Area (BOA) that extends across the cluster of ancient woodlands at the southwest extent of Milton Keynes and represents the remnants of a former royal hunting forest, somewhat typical of this part of the country.

9.2.3 Thirdly, there is a need to consider FMM087, FMM088 and FMM089, which deal with **Policy NE1** (Biodiversity and Geodiversity) and associated supporting text. A range of changes are proposed that essentially add detail to the policy, in response to concerns raised by parties with an interest in biodiversity, hence the proposed changes are broadly supported from a biodiversity perspective. More specifically, key changes include:

- Biodiversity and Geodiversity SPD – there is a new commitment to prepare this “*in conjunction with the Buckinghamshire and Milton Keynes Natural Environment Partnership*”. Consideration might be given to focusing the SPD solely on biodiversity, recognising that planning for geodiversity is quite a distinct and largely unrelated matter.
- Biodiversity net gain – there is a major focus on specifying approach and methodology in respect of planning for biodiversity net gain (BNG), including with extensive reference to current guidance and understanding of best practice. As part of this, there is a focus on the mitigation hierarchy, which is important, as otherwise there can be a concern that a switch to a BNG approach could lead to an increased emphasis on compensation at the expense of avoidance and mitigation, which – were this to occur – would give rise to a concern in respect of long term and cumulative impacts for biodiversity at large scale functional scales (e.g. landscape scales and the national scale). The proposed changes are supported; however, wording should be scrutinised to ensure consistency of message (notably, with “avoidance” always explained as the first step in the mitigation hierarchy). Also, there might be brief discussion of the importance of understanding biodiversity constraints and opportunities at an appropriate functional scale (e.g. the scale of a BOA) and with a long term perspective.

- 9.2.4 Finally, there is a need to consider FMM091, FMM092 and FMM093, which deal **Policy I1** (Green Infrastructure) and associated supporting text. The proposed changes are supported, from a biodiversity perspective, notably: clarifying that hard surfaced areas do not comprise green infrastructure (GI) and will not be counted as contributing to GI targets, clarifying the range of functions typically expected from GI and confirming that the current best available evidence comes from the Buckinghamshire Green Infrastructure Strategy (2009).

#### Conclusion on the further proposed modifications

- 9.2.5 The further proposed modifications to site-specific and thematic policies are **strongly supported** from a biodiversity perspective. Two of the proposed allocations for C2 older persons accommodation give rise to a limited degree of concern, from a biodiversity perspective. Proposed new policy in respect of biodiversity net gain potentially warrants detailed scrutiny, as this is an emerging policy area, with understanding of best practice still emerging.

### 9.3 Climate change adaptation

#### Discussion of further proposed modifications

- 9.3.1 The primary consideration is the proposed strategy in respect of new allocations for **C2** older persons accommodation, as discussed in Section 6 of this report. The conclusion is that one site gives rise to a degree of concern (Mandeville Grange Nursing Home, Wendover Road, Stoke Mandeville); however, concerns are limited, with the site affected by surface water flood risk rather than fluvial flood risk.

- 9.3.2 Secondly, there is a need to consider FMM096, which deals with **Policy I4** (Flooding). A range of changes are proposed that essentially supplement the level of detail in policy, in response to concerns raised by parties with an interest in flood risk, hence the proposed changes are broadly supported from a flood risk perspective. The most notable proposal is potentially a new requirement to *“include detailed modelling of any ordinary watercourses within or adjacent to the site, where appropriate, to define in detail the area at risk of flooding and model the effect of climate change.”* This is an important proposal as it can be the case that small streams and ditches shown by the nationally available flood risk dataset to be associated with surface water flood risk can be found to be associated with fluvial flood risk upon further investigation.

#### Conclusion on the further proposed modifications

- 9.3.3 One of the proposed allocations for C2 older persons accommodation gives rise to a limited degree of concern, from a flood risk perspective; however, on the whole, the further proposed modifications to site-specific and thematic policies are **strongly supported** from a flood risk perspective.

### 9.4 Climate change mitigation

#### Discussion of further proposed modifications

- 9.4.1 There are concerns in respect of emissions from transport associated with one of the proposed new allocations for **C2** older persons accommodation (Fremantle Court), and whilst the proposal to deliver a ‘net zero’ emissions scheme (without offsetting) is of note, it must be assigned limited weight as part of this appraisal, as it is potentially subject to change. Also, Bartletts Residential Home, Peverel Court, Portway Road, Stone is not ideally located, from a perspective of seeking to minimise dependency on the private car to access the site; however, Stone village centre is under 1.5km distant, and Aylesbury town centre is within easy cycling distance, with a cycle path along the A418, linking Aylesbury town centre to Stone (as well as a bus service).

- 9.4.2 Secondly, there is a need to consider FMM084, which deals with **Policy T8** (Electric Vehicle Parking). The proposal is to take a more ambitious approach in respect of the EV charging infrastructure that is provided, with faster charging required where necessary. Faster charging is becoming increasingly important as the size of vehicle batteries increases. In the past there has been support for speeds as low as 3kw; however, modern batteries can take over 12 hours to charge at this speed. A recent Government report discusses speeds up to 350kw;<sup>8</sup> however, EV charging places major strain on electricity networks. An implication is a need to take a spatially targeted approach, differentiating between: journey charging (where the driver's primary purpose for being at the charge point is to charge the vehicle, and hence there is a need for a rapid burst of charge); grazing charging (the driver's reason for being at the chargepoint is primarily for a purpose other than for charging, e.g. at a supermarket) and home and work charging (where slower speeds can be appropriate). Electricity grid constraints also necessitate innovative approaches in respect of pairing public charging facilities with renewable energy and/or battery storage. Solar canopy arrays at car parks for example represent an opportunity to maximise the use of solar power for the purpose of charging EVs. The generation profile of the solar installation will likely match the demand profile (i.e. highest occupation during the day when solar generation is at its peak), and visual impacts can often be deemed acceptable.

#### Conclusion on the further proposed modifications

- 9.4.3 There are concerns regarding greenhouse emissions from transport that will result from two of the new proposed allocations for C2 older persons accommodation; however, the further proposed modifications to Policy T8 (Electric Vehicle Parking) are supported (the possibility of further supplementing the policy could be considered, recognising that this is a fast moving policy area). Overall, the further proposed modifications will lead to **mixed effects**, with the effects of limited significance.

## 9.5 Communities

### Discussion of further proposed modifications

- 9.5.1 Firstly, with regards to the proposed new allocations for **C2** older persons accommodation, the proposed scheme for Fremantle Court involves delivery of a new nature reserve and modest new community facilities (and these are assumed to be firm proposals); and there is potentially a degree of opportunity associated with Land at the Winslow Centre, Winslow.
- 9.5.2 Secondly, there is a need to consider the following proposed changes to site-specific policy:
- FMM026 proposes the following change to criterion (q) of **Policy AGT1** (South Aylesbury): Provision of land, buildings and car parking for a new local centre, including a minimum of 370 sqm of convenience retail floorspace. Consideration might be given to ensuring certainty regarding the nature of the local centre that will come forward.
  - FMM030 proposes the following change to criterion (e) of **Policy AGT2** (South west Aylesbury): Provision of land, building and car parking for one primary school with a pre-school, funding to support for a children's centre, upper secondary school provision, grammar school provision, and expansion of existing special schools.
  - FMM033 proposes the following change to criterion (e) of **Policy AGT3** (Aylesbury north of A41): Mixed use local centre of around 4,000 sqm (Use appropriate classes A1, A2, A5 and D4 E, F.1, F.2 & Sui Generis). This change reflects the recent changes to national planning use class orders (discussed below); however, further consideration might be given to ensuring that a clear vision is in place for the local centre.

<sup>8</sup> See [gov.uk/government/publications/government-vision-for-the-rapid-chargepoint-network-in-england/government-vision-for-the-rapid-chargepoint-network-in-england](https://www.gov.uk/government/publications/government-vision-for-the-rapid-chargepoint-network-in-england/government-vision-for-the-rapid-chargepoint-network-in-england)

- FMM058 deals with **Policy WHA001** (Shenley Park), notably proposing new criteria dealing with transport and movement infrastructure, including a new requirement in respect of “*the extension of bridleways into the site (Bridleway WHA12/2 and Shenley Brook End Bridleway 006) to Redway Standard*”.

9.5.3 Thirdly, the following further proposed modifications deal with thematic policy:

- FMM086 – amends **Policy BE3** (Protection of Amenity of Residents) to clarify that development must “achieve a satisfactory level of amenity for future residents”.
- FMM094 – amends **Policy I2** (Sports and Recreation) to widen the scope of developments ‘captured’ by the requirement to meet the Council’s adopted standards in respect of securing adequate provision of sports and recreation facilities.
- FMM095 – amends **Policy I3** (Community Facilities) to widen the scope of developments ‘captured’ by the requirement to make a financial contribution in respect of compliance with the CIL Regulations to provide or enhance community facilities or community infrastructure.

9.5.4 Fourthly, there is a need to note FMM099, which updates the **Parking Standards** appendix of the VALP to reflect the new planning use class orders, which came into force in September 2020; however, it is not clear that the changes will lead to any ‘on the ground’ implications.

9.5.5 Finally, there is a need to note FMM097, which updates the **glossary** to clarify the evidence base for setting individual town centre boundaries. This is an important point of clarification, recognising that planning for town centres is increasingly recognised as an important matter for planning policy, reflecting changing retail behaviours, other societal changes and recent changes to planning use class orders. This matter is discussed further below, under ‘economy’.

#### Conclusion on the further proposed modifications

9.5.6 The further proposed modifications give rise to a range of considerations, in respect of ‘communities’ objectives, but overall are **broadly supported**. Site specific policy is amended for four strategic sites, with the most notable proposal being in respect of an additional requirement for Shenley Park (in respect of extending a bridleway into the site), which is strongly supported. Other notable changes seek to respond to the new town centre use classes (which essentially allow for greater flexibility around changes of use, and will result in a wider mix of uses in town centres, with less retail dominance) and national trends in respect of retail.

## 9.6 Economy

### Discussion of further proposed modifications

9.6.1 Firstly, with regards to the proposed new allocations for **C2** older persons accommodation, the appraisal of reasonable alternatives presented in Section 6 of this report highlights a degree of concern associated with the proposed approach, whereby there will be a shortfall against the established C2 need/target figure. This is because C2 older persons accommodation is an important employment sector. However, it is difficult to draw strong conclusions, including because under provision in Aylesbury Vale might lead to increased provision elsewhere (with associated generation of employment), likely within Buckinghamshire.

9.6.2 Secondly, there are important changes to **Policy E6** (Shop and business frontages) to reflect the recent national changes to use class orders. FMM079 presents new supporting text, notably explaining: “*There is overlap between uses in Class E and main town centre uses. The following uses within Class E are considered to constitute main town centre uses: E(a), E(b), E(e) and E(g)(i). The following uses within Class E may be considered main town centre uses depending on the specifics of the use: E(c)(iii) and E(d). Uses that fall within E(c)(i), E(c)(ii), E(f), E(g)(ii) and E(g)(iii) are not considered main town centre uses.*” FMM080 then presents updates to policy, setting out that E(a), E(b), E(c) uses will be permitted subject to achieving a good mix of retail uses overall, provided the proposal (individually or cumulatively):

- Contributes positively to the vitality and viability of the area, taking account of “*the mix of uses in the primary frontage, what is there currently and what development is committed, location, prominence and length of frontage of the premises, nature of the use proposed, including the level of pedestrian activity associated with it, and the number of ground floor vacancies in the area*”; and
- would not result in the loss of an E(a) use on a visually prominent site.

9.6.3 Finally, there is a need to consider changes to **Policy E5** (Development outside town centres). In particular, FMM078 deletes criterion (b) of Policy E5, which deals with avoiding proposals that would have a significant adverse impact on existing, committed or planned investment in a town centre. This is because the requirement is already set out in the NPPF.

#### Conclusion on the further proposed modifications

9.6.4 The key consideration here is the VALP response to the recent national changes to town centre planning use class orders. There is an inevitable need to respond to the national changes by altering policy to clarify that class E uses will be permitted on high streets in locations where there was previously support for retail (which is now just one element of class E); however, in response to concerns regarding the vitality of town centres as retail centres, the proposal is for the policy to include support for particular appropriate class E uses (changes from retail to other types of class E use will still happen where no consent is required, but this is thought likely to be a fairly rare situation). This is considered to be a balanced and appropriate response; however, there is clearly a need for close scrutiny, given that this is a new area of policy for Local Plans, and given evolving views on the future of retail and town centres. There is also a need to consider the implications of the new E use class for employment areas, where there will now be greater potential for retail to come forward. In conclusion, the further proposed modifications are **broadly supported**.

## 9.7 Heritage

### Discussion of further proposed modifications

9.7.1 The proposed new allocations for **C2** older persons accommodation are thought (following desk-based analysis) to give rise to limited concerns, from a heritage perspective. The following points are of note:

- Land at the Winslow Centre, Winslow – the site is within c.100m of four grade 2 listed buildings and the edge of the Winslow Conservation Area; however, there is significant intervening modern built form, such that impacts to the setting of these assets is not considered likely.
- Land adjacent to Martin Dalby Way/Paradise Orchard, Berryfields – the officers report considered by members at the time of granting planning permission explains that there are a number of sensitivities in respect of archaeology, but that the site has been fully investigated (see discussion in Appendix I).
- Mandeville Grange, Wendover Road, Stoke Mandeville – a single grade 2 listed building is located c.100m to the south of the site, along the A413; however, there are around seven intervening large homes, such that it is not thought likely that development would impact on the setting of the listed asset.
- Fremantle Court, Risborough Rd, Stoke Mandeville – three small ancient monuments are located within a c.1km radius of the site, which potentially indicates an increased likelihood of archaeological sensitivity; however, it is fair to assume that archaeology would be appropriately addressed through the planning application process.

9.7.2 A second point to note is FMM015, which clarifies the **RAF Halton** closing date in Policy S2 as 2025, rather than 2022, yet still proposes to deliver around 1,000 homes in plan period (to 2033). This site is sensitive, from a heritage perspective, hence it will be important to ensure that development is undertaken with due care and attention to mitigation and enhancement. See further discussion below, under ‘housing’.

- 9.7.3 Thirdly, FMM072 proposes a minor change to **Policy MMO006** (Land east of Walnut Drive and west of Fosscote Road). Specifically, the proposal is for the yield of the site (170 homes) to be an 'at least' figure. This is of note, because the site is subject to a degree of heritage constraint, including due to a risk of traffic generated affecting the nearby Maids Moreton Conservation Area; however, use of 'at least' would bring the policy into line with other VALP site allocations.
- 9.7.4 Finally, FMM085 amends **Policy BE1** (Heritage Assets) to require a heritage statement in some circumstances, specifically where there is a need to assess the significance of any heritage assets and the impact on these by the development proposal.

#### Conclusion on the further proposed modifications

- 9.7.5 The proposed modifications potentially have a bearing on the timing of redevelopment at RAF Halton, which is a sensitive site from a heritage perspective; however, there is a new requirement for heritage statements to be submitted as part of planning applications in some circumstances. Overall, the further proposed modifications are **broadly supported**.

## 9.8 Housing

#### Discussion of further proposed modifications

- 9.8.1 The primary consideration is the proposed strategy in respect of new allocations for **C2** older persons accommodation, as discussed in Section 6 of this report. The conclusion is that the preferred option gives rise to a degree of concern, as there would be a shortfall against the target; however, significant negative effects are not predicted as there would be a strong possibility of the shortfall being addressed by one or more windfall schemes, supported by a suitably permissive policy framework.
- 9.8.2 A less significant consideration relates to FMM015, which explains that **RAF Halton** is now set to close in 2025, rather than 2022 as was previously thought to be the case. The proposal remains to deliver around 1,000 homes at the site in plan period (to 2033), which may imply a degree of delivery risk. However, on the other hand, it is understood that it will be possible for demolition and construction to begin prior to the final base closure date.
- 9.8.3 Finally, FMM076 deletes supporting text to **Policy D3** (Proposals for non-allocated sites at strategic settlements, larger villages and medium villages), removing text that sought to explain that 'presumption in favour of sustainable development' set out at NPPF paragraph 11.

#### Conclusion on the further proposed modifications

- 9.8.4 As per the conclusion reached in Section 6, there is a need to predict that the further proposed modifications will lead to **negative effects** in respect of housing objectives, because the proposed approach to C2 older persons accommodation allocations (Policy H6B) could potentially result in a shortfall against the established need/target figure. Another slight concern relates to the proposal to compress the timescales for delivering homes at RAF Halton. Negative effects are not predicted to be 'significant' on balance, but there is some uncertainty.

## 9.9 Landscape

#### Discussion of further proposed modifications

- 9.9.1 The primary consideration is the proposed strategy in respect of new allocations for **C2** older persons accommodation, as discussed in Section 6. The conclusion is that the preferred option performs well relative to alternatives; however, there are sensitivities associated with three of the proposed allocations (Freemantle Court; and Land adjacent to Martin Dalby Way/Paradise Orchard, Berryfields). These sensitivities are discussed further in Appendix I.

9.9.2 Secondly, FMM072 proposes a minor change to **Policy MMO006** (Land east of Walnut Drive and west of Foscoote Road). Specifically, the proposal is for the yield of the site (170 homes) to be an 'at least' figure. This is of note, because the site is subject to landscape constraint; however, use of 'at least' would bring the policy into line with other VALP site allocations.

9.9.3 Other notable changes relate to the conversion of buildings in the rural area:

- FMM077 relates to **Policy D3** (Proposals for non-allocated sites at strategic settlements, larger villages and medium villages), clarifying that the policy "*does not preclude permitted development for converting agricultural buildings to residential*" in line with the Town and Country Planning (General Permitted Development) (England) Order 2015.
- FMM081 seeks to clarify that support for tourism development in **Policy E7** ("*The council will promote a growing, sustainable tourism sector, and will support proposals for new or expanded tourism, visitor or leisure facilities*") does not relate to tourist accommodation.
- FMM090 relates to **Policy C1** (Conversion of Rural Buildings), clarifying that proposals will be supported where they are not located well away from existing settlements and not located where utilities are not available.

#### Conclusion on the further proposed modifications

9.9.4 There are sensitivities associated with two of the proposed allocations for C2 older persons accommodation (Fremantle Court; and Land adjacent to Martin Dalby Way/Paradise Orchard, Berryfields); however, concerns are of limited significance. On balance it is appropriate to conclude **limited implications** for the achievement of landscape objectives.

### 9.10 Natural resources

#### Discussion of further proposed modifications

9.10.1 No proposals of note.

#### Conclusion on the further proposed modifications

9.10.2 The further proposed modifications give rise to **no notable implications**.

### 9.11 Pollution

#### Discussion of further proposed modifications

9.11.1 A primary consideration relates to FMM058, which deals with **Policy WHA001** (Shenley Park; as proposed in 2019). One of the current proposals is to amend criterion (v) to include reference to consultation with the water and sewerage undertaker.

9.11.2 Similarly, FMM059 proposes an amendment to criterion (j) of **Policy BUC043** (Land west of AVDLP allocation BU1 Moreton Road, Buckingham) to include reference to consultation with the water and sewerage undertaker.

#### Conclusion on the further proposed modifications

9.11.3 The further proposed modifications give rise to limited implications for pollution objectives, but effects are likely to be **positive** overall, particularly given two proposed site specific requirements to consult with the water and sewerage undertaker.

## 9.12 Transport

### Discussion of further proposed modifications

- 9.12.1 With regards to **C2** older persons accommodation, there are notable highways concerns associated with Freemantle Court; however, there is good potential for mitigation (the Highway Authority recommends “that access via the existing access... is investigated”, as discussed in Appendix I). None of the other proposed allocations give rise to any notable concern.
- 9.12.2 Potentially a more significant consideration is FMM082, which proposes a modification to **Policy T3** (Supporting local transport schemes) to incorporate infrastructure that has been tested, is required, and is subject to known delivery mechanisms. The most significant changes are deletion of two of the Aylesbury link roads as these are aspirational schemes rather than required schemes. This is because the schemes are not necessary to deliver the allocated sites and no funding is in place for delivery.
- 9.12.3 A secondary consideration relates to FMM058, which deals with **Policy WHA001** (Shenley Park; as proposed in 2019). One of the current proposals is to amend criterion (o) to add more detail about detailed traffic modelling; and another proposal is to amend criterion (p) to mention specific schemes. These changes are supported.
- 9.12.4 Thirdly, FMM072 proposes a minor change to **Policy MMO006** (Land east of Walnut Drive and west of Foscode Road). Specifically, the proposal is for the site yield (170 homes) to be an ‘at least’ figure. This is of note, because the site is subject to transport constraints (as a larger site at a lower order settlement); however, use of ‘at least’ would bring the policy into line with other VALP site allocations.
- 9.12.5 Other further proposed changes of note are:
- FMM036 - corrects the name of link road in **Policy AGT4** (South of A41 Aylesbury)
  - FMM083 – proposes a change to **Policy T4** (Capacity of the transport network to deliver development), clarifying the thresholds for transport assessments for different proposals in response to changes to the use class orders.
  - FMM084 – deals with electric vehicle charging, as discussed above.

### Conclusion on the further proposed modifications

- 9.12.6 The further proposed modifications are **broadly supported**, although there is potentially a degree of concern regarding the loss of policy support for long term aspirational transport schemes for Aylesbury Garden Town.

## 9.13 Waste

### Discussion of further proposed modifications

- 9.13.1 No proposals of note.

### Conclusion on the further proposed modifications

- 9.13.2 The further proposed modifications give rise to **no notable implications**.

## 9.14 Conclusion

### Conclusion on the further proposed modifications

- 9.14.1 The appraisal finds that the further proposed modifications perform well in respect of biodiversity, climate change adaptation (flood risk), communities, economy, heritage, pollution and transport objectives; however, there are notable draw-backs in terms of:
- climate change mitigation (because one of the new proposed allocations for C2 older persons accommodation is located in an isolated location, potentially leading to car dependency); and
  - housing (because the combined capacity of the new proposed allocations for C2 older persons accommodation falls short of the established need / target figure).
- 9.14.2 All of the effects are of limited significance, i.e. significant effects are not predicted. Finally, it should be noted that the appraisal highlights three policy areas (biodiversity net gain; electric vehicle charging; new local centres) that might warrant further scrutiny ahead of plan finalisation.

### Conclusion on the Modified VALP (2019) plus further proposed modifications

- 9.14.3 The SA Report concluded as follows, in respect of the Proposed Submission Plan:
- “The appraisal finds the Proposed Submission VALP to perform well in terms of a number of sustainability objectives, with ‘significant positive effects’ predicted in terms of Communities, Economy, Housing and Transport. These significant positive effects mostly relate to the proposal to meet objectively assessed needs - as established by the Housing and Economic Development Needs Assessment (HEDNA) - and focus growth so as to support community and transport infrastructure upgrades.*
- Under one heading - Natural resources - it is fair to conclude ‘significant negative effects’, as the proposed strategy will result in significant loss of best and most versatile (BMV) agricultural land. Several proposed growth locations are associated BMV agricultural land.*
- Also, the appraisal concludes ‘uncertain negative effects’ in respect of two topics: Climate change adaptation’, on the basis that one of the proposed new garden communities at Aylesbury (‘Land north of A41’) is less than ideal in flood risk terms; and ‘Pollution’, on the basis that a high growth strategy at Buckingham / Maids Moreton will necessitate major to the wastewater treatment works (if a risk of pollution incidents is to be avoided).*

*The Council, and the appointed Planning Inspector, can give consideration to these appraisal conclusions during the Examination in Public. Similarly, the Council / Inspector should give consideration to suggested specific changes to policy wording. Suggested changes cover...”*

- 9.14.4 The SA Report Addendum (2019) then found that this conclusion “**broadly holds true**” for the submitted plan plus proposed modifications. This conclusion was reached following an appraisal of the proposed modifications published for consultation at that time, which reached the following conclusion: *“The appraisal predicts positive effects in respect of: communities, economy, housing and transport objectives; however, the appraisal predicts negative effects in respect of: climate change adaptation (flood risk), landscape and natural resources objectives.”*
- 9.14.5 At the current time the above conclusions still **broadly hold true**. A stand-out consideration is the proposed approach to C2 older persons accommodation; however, it is important to recall that this is just one element of the wider strategy for meeting housing / accommodation needs. Another stand-out consideration relates to the VALP’s response to the recent national changes to planning use classes, which has implications for town centres across the plan area; however, effects are nonetheless of limited significance.

## **PART 3: WHAT HAPPENS NEXT?**

**10 INTRODUCTION**

10.1.1 The aim of this section is to explain next steps in the plan-making / SA process.

**11 PLAN FINALISATION**

11.1.1 Subsequent to the current modifications consultation the Inspector will consider all representations received, before then considering whether or not there is a need for further examination hearing sessions. In due course, the Inspector will then prepare a report on the soundness of the Local Plan.

11.1.2 Once the Inspector is able to find the plan 'sound', it will then be adopted by the Council. At the time of adoption an 'SA Statement' will be published that explains the process of plan-making / SA in full and presents 'measures decided concerning monitoring'.

**12 MONITORING**

12.1.1 At the current time, there is a need to present 'measures envisaged concerning monitoring'.

12.1.2 The submitted SA Report (2018) suggested the need to consider an increased focus on flood risk, waste-water treatment upgrades (and water quality more generally), delivery of low carbon infrastructure; and travel patterns associated with residents of new garden communities. These recommendations broadly hold-true in light of the 2019 proposed modifications and 2020 further proposed modifications.

12.1.3 The 2019 SA Report Addendum reported that the 2019 proposed modifications potentially give rise to a need to consider closely monitoring low carbon measures at the new proposed Shenley Park strategic allocation.

12.1.4 At the current time, the further proposed modifications potentially give rise to a need to consider closely monitoring C2 accommodation provision, with a view to identifying any deliverability issues at the earliest opportunity. There is also a need to closely monitor changes to uses in town centres.

## APPENDIX I: SITE OPTIONS

### Introduction

The aim of this appendix is to present further information on the seven new site options introduced in Section 5.3. Specifically, the merits of the sites are discussed under each of the SA framework topic headings introduced in Section 3.

### Biodiversity

The site standing-out as being subject to the most notable degree of constraint is **Leys House, Whaddon Road, Newton Longville**, as the majority of this site is shown by the nationally available priority habitat dataset (magic.gov.uk) to comprise woodland priority habitat. In practice, the land in question comprises a large garden bounded by mature hedgerows and interspersed with a number of mature trees.

It is also important to consider the site in the context of surrounding land uses, namely land that is set to be developed as part of the committed 1,855 home Salden Chase scheme (15/00314/AOP). Figure A shows the site as the 'cut out' part at the southwest edge of the Salden Chase site. Figure A also serves to highlight the mature trees on-site, as well as the mature hedgerow at the eastern edge of the site, along Weasel Lane, which is a public bridleway and forms part of the National Cycle Network.

Finally, it is important to note that a revision to the Salden Chase planning application is currently under consideration, and as part of this the Local Wildlife Trust (BBOWT) has objected to the scheme (although Natural England has not objected, and Bucks Council Ecology has only raised requests for further information). BBOWT's objection is on four grounds, one of which being "*insufficient mitigation for loss of woodland*". BBOWT's submission (July 2020)<sup>9</sup> goes on to explain that: "*We would like to see an area of the green space provided specifically for wildlife as a nature reserve.*" There can be no certainty regarding the feasibility of the site being used as a nature reserve, as the land owner could well chose not to make it available for this use; however, it is potentially appropriate for this use, given:

- This is the only area of priority habitat within the site bar land at the northern extent (bordering the A421);
- A nature reserve would link well with the play / games areas (x3) that are proposed to be delivered adjacent or near adjacent to the site, and the 'spine' of green infrastructure that is proposed to run southwest to northeast though the site, associated with the course of Weasel Lane.
- A nature reserve would link well with the 'linear park' that is proposed to run along the south-western and south-eastern edges of the site, along which a 'boundary walk' footpath is proposed.

However, having said this, allocation of the site for C2 (and/or C3) housing could be the easiest way to address the current issue of the boundary walk having to divert around the site – see pink line in Figure B.

Another site subject to notable constraint is **Bartletts Residential Home, Peverel Court, Portway Road, Stone** (12 units). Specifically, the eastern half of the site is shown by the nationally available priority habitat dataset (magic.gov.uk) to comprise woodland priority habitat. The submitted planning application (20/01449/APP) shows that only one of the five proposed blocks would fall within this more constrained eastern part of the site; however, concerns have nonetheless been raised through the planning application process. In particular, the response received from the Bucks Council Ecology Team explains: "*There are a number of mature trees within the proposed development site. The Arboricultural Impact Assessment details that a number of trees will be removed and/or pruned as a result of the proposal. Further information is required in the form of a 'Preliminary Ground Level Roost Assessment' of these trees to determine the potential for bats and presence of potential roost futures, to determine the impact the proposals may have on bats.*"<sup>10</sup>

Another site with notable onsite vegetation is **Fremantle Court, Risborough Rd, Stoke Mandeville**; however, this is not shown (by the nationally available dataset) to comprise priority habitat. The site taken as a whole, and considered alongside the mature gardens of the cluster of houses adjacent to the south, does represent a notable area with a high density of trees, in a wider landscape that is associated with a notably low density

<sup>9</sup> See [publicaccess.aylesburyvaledc.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=NIZVU8CL0BI00](https://publicaccess.aylesburyvaledc.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=NIZVU8CL0BI00)

<sup>10</sup> See [publicaccess.aylesburyvaledc.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=Q9WZA9CLL2900](https://publicaccess.aylesburyvaledc.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=Q9WZA9CLL2900)

of woodlands. Within the site itself, the area of greatest sensitivity appears to be the southeast part of the site, where there appears to be a density of trees that form to comprise a small copse; however, this is the part of the site proposed as a potential location for a 'later phase' (50 units). Finally, it is noted that the materials submitted by the site promoter propose: "A 17-acre [6.9 ha] nature reserve integrating and blending with the areas of built development – dedicated in perpetuity through a deed of covenant." It appears that this nature reserve could feasibly extend to ~8 ha were the 'potential later phase' land to be included.

A final site with notable on-site vegetation is **Mandeville Grange, Wendover Road, Stoke Mandeville**. The proposed extension would take in a large part of the existing garden, which includes a number of notable mature trees (and it is noted that the adjacent gardens of large properties to the west of the A413, along a circa 0.5 km stretch, also include mature gardens, with a high density of trees visible from satellite imagery, such that this garden might comprise an element of an ecological network); however, due consideration was given to this patten through the planning application process in 2010, and impacts deemed to be acceptable.

Finally, there is a need to note **Land at the Winslow Centre, Winslow**, as the proposed scheme would lead to the loss of land designated as Local Green Space by the Winslow Neighbourhood Plan (2014). The land in question appears to be amenity grassland, with a hedgerow at the southern extent that presumably would be retained as part of any development scheme, hence the proposed scheme gives rise to limited concern. The Neighbourhood Plan states the following regarding the area of Local Green Space: "The land adjoining the former secondary school at the Winslow Centre will play an increasingly important role in providing a tranquil, informal recreational area and retaining the existing sports facilities, all serving new housing allocations."

The other two new allocation options appear to be fairly unconstrained, from a biodiversity perspective.

Figure A: Proposed Salden Chase masterplan



Figure B: Proposed Salden Chase green infrastructure plan



### Climate change adaptation

The key matter for consideration here is flood risk.

None of the sites in question intersect a fluvial flood risk zone; however, there is a notable patch of surface water flood risk affecting **Mandeville Grange, Wendover Road, Stoke Mandeville**.

Also, it is noted that land in the vicinity of Land adjacent to Martin Dalby Way/Paradise Orchard, Berryfields is affected by flood risk associated with the River Thames; however, neither the defined fluvial flood zone nor the associated surface water flood zones extends into the site. The roundabout from which access to the site is gained is subject to a notable degree of surface water flood risk; however, the site has planning permission, with the Environment Agency not having raised any concerns.

### Climate change mitigation

A key matter for consideration here is CO<sub>2</sub> emissions from transport. It is appropriate to focus on this matter under this heading, with other transport related matters (in particular around safe access and traffic congestion) considered below, under the 'Transport' heading.

The site that stands-out as performing relatively poorly is **Fremantle Court, Risborough Rd, Stoke Mandeville**. This is comfortably the largest of the schemes currently under consideration, and is situated in an isolated location, c.1.0km to the south of Stoke Mandeville (although a committed 74 home scheme is set to bring the southern edge of the village closer). There is a small cluster of homes adjacent to the site, known as North Lee; however, there are no community facilities. Furthermore, the site will become further separated from Stoke Mandeville by the severing of Risborough Road due to HS2.

Good accessibility by walking, cycling, public transport and private vehicles (for which the aim is to minimise distance travelled) is an important consideration when planning for older persons accommodation. In the case of the proposed Fremantle Court scheme a considerable amount of parking is proposed, as a proportion of the residents are expected to own a car, plus staff and visitors will access the site by private car. The proposed scheme involves "a car club" involving two cars that are available for use by residents, and electric minibus to transport staff to and from the site, electric vehicle charging points and a green travel plan for staff (encouraging use of bus, noting the adjacent bus stop on the Aylesbury to Princes Risborough Route); however, there is a need to give limited weight to detailed aspects of specific proposals, as these are subject to change.

The other site that is less well located, in transport terms, is **Bartletts Residential Home, Peverel Court, Portway Road, Stone**; however, Stone village centre is under 1.5km distant, and Aylesbury town centre is within easy cycling distance. Furthermore, there is a cycle path along the A418, linking Aylesbury town centre to Stone (as well as a bus service).

Other sites are fairly well located, in that they are located within existing or future settlement boundaries, and also likely to be accessible by public transport.

Finally, with regards to CO<sub>2</sub> emissions from the built environment, there is little or no potential to meaningfully differentiate between the competing site options. There are, however, two points potentially of note.

Firstly, the proposed scheme for Fremantle Court, Risborough Rd, Stoke Mandeville involves design that achieves Passivhaus standard, which is an ambitious approach to ensuring energy efficiency, as well as onsite renewable power generation such that net zero is achieved on-site (i.e. without a need for offsetting). This is a highly ambitious approach; however, it is considered appropriate to give limited weight to this aspect of the site specific proposals, as the proposal may be subject to change.

Secondly, it could feasibly be the case that the Leys House, Whaddon Road, Newton Longville scheme serves to increase the likelihood of delivering a heat network as part of the wider Salden Chase scheme. The submitted Energy Statement explains that a heat network / district heating scheme is “*not viable in a site-wide context*”; however, it goes on to state that this position “*will be kept under review as detailed designs progress*”.<sup>11</sup> A 60 bed care home would have a significant heating demand, and hence would assist with viability. However, ultimately any opportunity is highly uncertain, and could be marginal. Were there to be an opportunity, then time would be of the essence, as heat networks must be designed in from the outset.

## Community

The site option of greatest note is **Land at the Winslow Centre, Winslow**. This site is owned by Buckinghamshire Council, and part of it is allocated in the made Winslow Neighbourhood Plan (2014) for 30 extra care units, with these units already counting towards meeting the established need for C2 units over the plan period. However, the Council now supports a scheme involving 83 units, as one component of a wider proposed scheme for the Winslow Centre, to address the current issue of outdated facilities onsite. This scheme was agreed by Cabinet in September 2020 and is supported by the Parish Council. There is clear merit to the scheme on this basis; however, there is a need to strike a note of caution as the new proposed scheme will extend beyond the existing allocated site, which comprises existing buildings, to take-in local green space designated by the Winslow Neighbourhood Plan. The Neighbourhood Plan states the following regarding the area of Local Green Space: “*The land adjoining the former secondary school at the Winslow Centre will play an increasingly important role in providing a tranquil, informal recreational area and retaining the existing sports facilities, all serving new housing allocations.*” However, the functions of the open space are to be replaced by a new sports hub near to Winslow station. The review of the Local Green Space allocation and the allocation of the sports hub will be addressed by the proposed review of the Winslow Neighbourhood Plan.

Another site option of note is **Fremantle Court, Risborough Rd, Stoke Mandeville**. In particular, it is noted that the materials received from the site promoter include a significant emphasis on the potential for the scheme to deliver community benefits, including access to the new facilities onsite, access to the nature reserve and an enhancement to the local network of public footpaths. Site-specific proposals are subject to change; however, in this case it is fair to assume that the proposal is ‘firm’.

Finally, it is noted that Land adjacent to Martin Dalby Way/Paradise Orchard, Berryfields will make use of space that is currently underutilised, and will form part of a wider scheme involving a GP surgery, a nursery and employment land.

## Economy

There is not considered to be any potential to meaningfully differentiate between the competing site options. It would not be fair to suggest that larger options outperform smaller options on the basis that they will lead to more onsite employment. This is because the same level of employment could be provided across a package of smaller sites.

Finally, it is noted that Land adjacent to Martin Dalby Way/Paradise Orchard, Berryfields is an existing employment allocation; however, this matter was explored in detail through the recent planning application process, with the decision reached that re-allocation of the site for C2 uses will not be to the detriment of achieving district-wide employment land objectives (i.e. meeting targets for new employment land).

## Heritage

None of the site options stand-out as particularly constrained, although the following are of note:

- **Land at the Winslow Centre, Winslow** – the site is within c.100m of four grade 2 listed buildings and the edge of the Winslow Conservation Area; however, there is significant intervening modern built form, such that impacts to the setting of these assets is not considered likely.

<sup>11</sup> See [publicaccess.aylesburyvaledc.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=NIZVU8CL0BI00](https://publicaccess.aylesburyvaledc.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=NIZVU8CL0BI00)

- **Land adjacent to Martin Dalby Way/Paradise Orchard, Berryfields** – the officers report considered by members at the time of granting planning permission explains: *“Approximately 200 metres to the east of the proposed development on the far side of Martin Dalby Way is a Scheduled Monument for “Deserted villages and Civil War earthwork”. Due to the location of the site and the intervening land and road, it is considered that the development would have no detrimental impact on this feature. With regard to archaeology, policy GP.59 of the AVDLP, requires the council to protect, enhance and preserve the historic interest and its setting. In this instance, the application site was subject to archaeological investigation as part of the Berryfields Major Development Area between 2007 and 2016. Works included a geophysical survey and a ‘strip, map and sample’ excavation, and revealed evidence of Roman and medieval activity. The results of these phases of works have been assessed and reported on in a recently submitted Monograph by Oxford Archaeology and the site is considered to have been fully investigated.”*
- **Mandeville Grange, Wendover Road, Stoke Mandeville** – a single grade 2 listed building is located c.100m to the south of the site, along the A413; however, there are around seven intervening large homes, such that it is not thought likely that development would impact on the setting of the listed asset.
- **Fremantle Court, Risborough Rd, Stoke Mandeville** – three small ancient monuments are located within a c.1km radius of the site, which potentially indicates an increased likelihood of archaeological sensitivity; however, it is fair to assume that archaeology would be appropriately addressed through the planning application process (in line with policy), as per the Berryfields scheme, discussed above.

## Housing

There is not considered to be any potential to meaningfully differentiate between the competing site options. It would not be fair to suggest that larger options outperform smaller options on the basis that they will lead to more C2 units being provided onsite. This is because the same number of units could be provided across a package of smaller sites.

## Landscape

Two sites give rise to a degree of concern.

Firstly, **Leys House, Whaddon Road, Newton Longville** is located at a high point in the landscape; specifically, higher than all or most of committed Salden Chase site to the west, north and east. There is also a need to recall the role of this land as part of the proposed green infrastructure and landscaping strategy for the scheme (see Figures A and B). The main green infrastructure spine, running southwest to northeast through the scheme (following the course of Weasel Lane, which runs adjacent to the Leys House site, and is a public bridleway and National Cycle Route) comprises something of a ‘ridge’ of raised land. The site is not formally identified as providing green infrastructure in the current planning application, but may serve a role, or could potentially serve a role.

Secondly, **Fremantle Court, Risborough Rd, Stoke Mandeville** would presumably be clearly visible from the public right of way (footpath) that runs adjacent to the site; however, it is noted that the proposed scheme involves delivering enhancements to the local footpath network, as well as an onsite nature reserve with an associated footpath network.

A further site of note is Mandeville Grange, Wendover Road, Stoke Mandeville. It seems likely that the scheme would be visible from nearby properties; however, this is a matter of residential amenity more so than ‘landscape’, and this matter will have been considered at the time of granting planning permission in 2010.

Finally, it is noted that Land adjacent to Martin Dalby Way/Paradise Orchard, Berryfields will make use of space that is currently underutilised, in that it allocated for employment land that has not come forward.

## Natural resources

The key consideration here is avoiding loss of productive agricultural land, and in particular that which is of ‘best and most versatile’ quality.

None of the sites in question are currently in agricultural use, and it is not considered likely that there is the potential to bring any of the sites in question into agricultural use in the future. As such, there is no potential to meaningfully differentiate between the site options.

### Transport

Comments have been received from the Highways Development Management team at Buckinghamshire Council, serving to highlight a degree of concern associated with **Fremantle Court, Risborough Rd, Stoke Mandeville**. Specifically, the following comment is made:

*“[The] proposals include a new vehicular access off the A4010 Risborough Road which is subject to a 50mph speed limit, and a priority arrangement including a right-turn lane is shown on the submitted information. The Highway Authority would resist the creation of a new access onto this classified road, and would recommend that access via the existing access serving Freemantle Court is investigated. Similarly, a potential future phase of development to the south-east of Freemantle Court may result in a further additional vehicular access, and a comprehensive approach is required to minimise the number of vehicular accesses onto the A4010 for capacity and highway safety reasons. Sustainable travel measures are proposed, including a car club, electric minibus and electric vehicle charging points, and such measures are likely to be acceptable to encourage non-car travel to and from the site. A TA will be required to demonstrate that the impact of the quantum of development is, or can be made acceptable, and that access arrangements are satisfactory. In addition, a comprehensive approach to the development of the site is required.”*

### Pollution

There is no potential to meaningfully differentiate between the site options.

### Waste

There is no potential to meaningfully differentiate between the site options.