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1 INTRODUCTION

1.1 Background

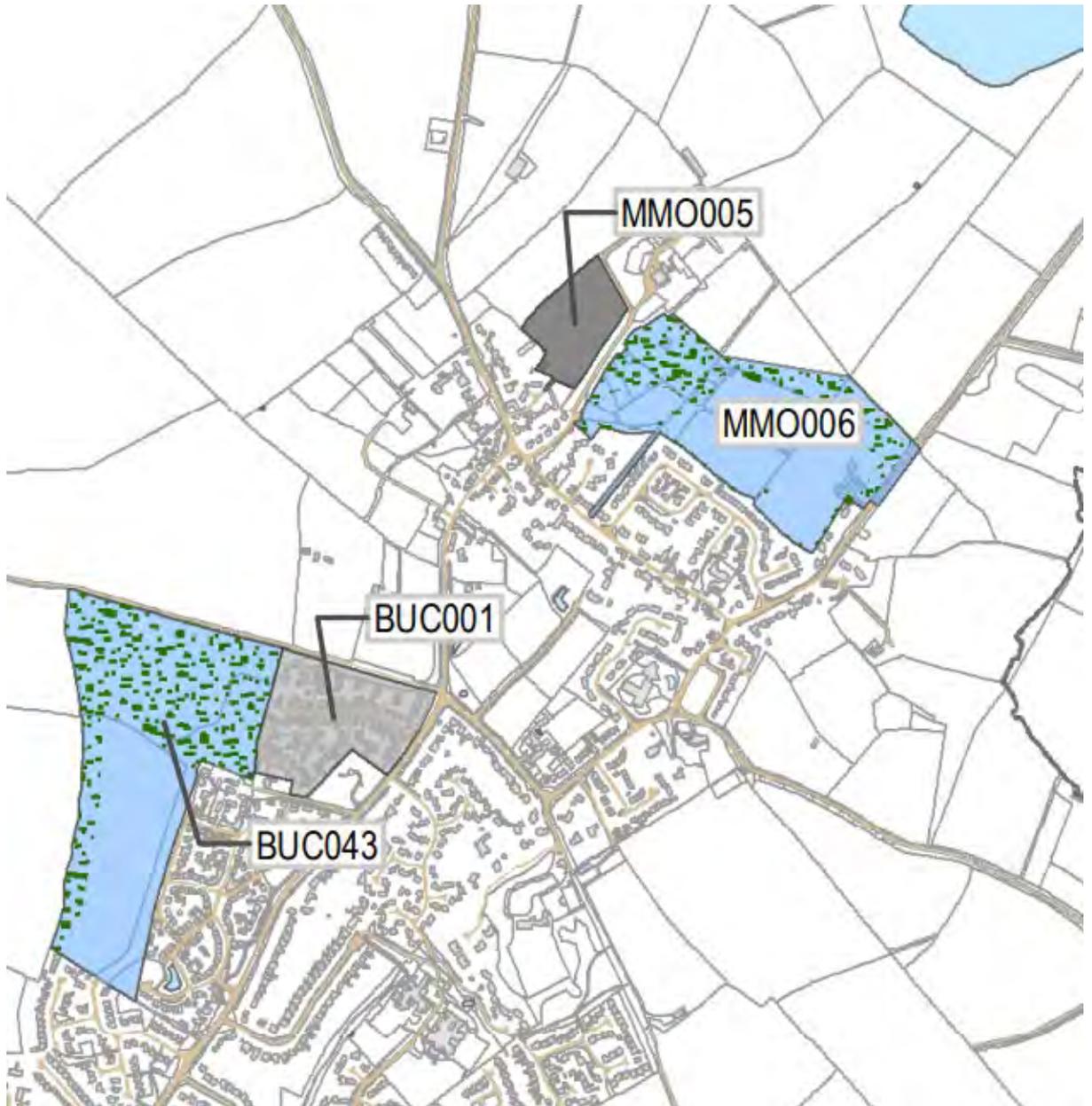
- 1.2 The Vale of Aylesbury Local Plan (VALP) was submitted to the Secretary of State for Housing, Communities and Local Government, for examination by an appointed Planning Inspector, on 28th February 2018. Examination hearings sessions were held in July 2018.
- 1.3 Following hearings the Inspector published Interim Findings on 29th August 2018, which concluded as follows: *“At the end of the hearing sessions, I offered the opinion that VALP is capable of being made sound. That remains my opinion... These interim findings, together with matters agreed following my questions prior to the hearing sessions are intended to help the Council work towards producing a series of main modifications to the plan...”*
- 1.4 Main modifications to the VALP (as previously submitted) were subsequently published for consultation in November 2019, with the consultation closing in December. A Sustainability Appraisal (SA) Report Addendum was also published alongside the main modifications, with the aim of presenting an appraisal of the main modifications and reasonable alternatives.¹
- 1.5 A number of responses were received in respect of main modifications MM101 and MM283, which deal with proposed allocation MMO006 (Land east of Walnut Drive and west of Foscombe Road, Maids Moreton) and the policy map for Buckingham and Maids Moreton respectively. More specifically:
- 1.6 MM101 – increases the area of MMO006 by 0.7 ha, and also makes adjustments to site-specific policy, in order to bring the policy into line with the Council’s resolution to grant planning permission for the site (subject to signing a Section 106 agreement; planning reference 16/00151/AOP).²
- 1.7 MM283 – makes a consequential change to the Policy Map to reflect the increased extent of MMO006, and also makes two other adjustments of note, namely adding a new committed site for 12 homes at Scotts Farm, Towcester Road (planning reference 16/02669/AOP), to the west of MMO006, and adding a green hatching to indicate an area within MMO006 that will be left as open / greenspace. Figure 1.1 shows an extract from the modified Policy Map for Buckingham and Maids Moreton.
- 1.8 The SA Report Addendum ‘screened-out’ these two main modifications on the basis that they were judged unlikely to give rise to significant effects, neither in isolation nor in combination with any other of the main modifications nor in combination with the ‘unmodified’ elements of VALP.
- 1.9 Aim of this SA Note

¹ See <https://www.aylesburyvalecd.gov.uk/valp-main-modifications-consultation>

² The resolution to grant planning permission (subject to signing of a Section 106 agreement) in respect of planning application 16/00151/AOP was reached by the Aylesbury Vale District Council Planning Committee on 20th February 2019, see <https://buckinghamshire.moderngov.co.uk/CeListDocuments.aspx?Committeeld=515&MeetingId=3748&DF=20%2f02%2f2019&Ver=2>

- 1.10 Although the main modifications dealing with Site MMO006 (namely MM101 and MM283) were screened-out of the SA process, a number of representations on the SA process were received by those objecting to the allocation of Site MMO006.
- 1.11 These representations deal with the analysis presented within the SA Report published alongside the Proposed Submission Version of the VALP in 2017, as opposed to analysis presented within the SA Report Addendum of 2019.
- 1.12 The aim of this SA Note is to respond to those representations on the SA Report (2017). Specifically, this SA note aims to:
 - 1.13 Recap how Site MMO006 has been examined through the SA process;
 - 1.14 Present brief analysis of site MM006 in light of the latest available evidence; and
 - 1.15 Draw conclusions and discuss next steps.

Figure 1.1: Extract from the Buckingham and Maids Moreton Policy Map

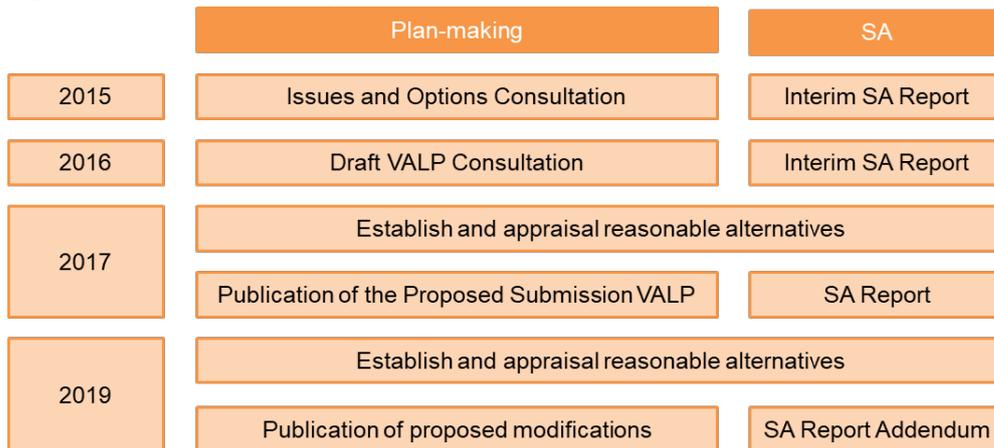


2 RECAPPING THE SA PROCESS TO DATE

2.1 Overview

2.2 Key milestones in the plan-making / SA process to date are summarised in Figure 2.1. The key steps and outputs to discuss here are those from 2017, namely work to establish and appraise reasonable alternatives and then prepare the SA Report for publication alongside the Proposed Submission VALP.³

Figure 2.1: The plan-making / SA process



Establishing and appraising reasonable alternatives in 2017

2.3 In accordance with the prescribed SA process, as understood from the Environmental Assessment of Plans and Programmes (SEA) Regulations 2004, work to establish and appraise “reasonable alternatives” was undertaken in 2017, in time to inform preparation of the Proposed Submission VALP. This work is explained within Part 1 of the SA Report (2017), which answers the question “What has plan-making / SA involved up to this point?”.

2.4 The first section within Part 1 (Section 5 of the SA Report) explains that, in the context of the VALP, the requirement to appraise “reasonable alternatives” equates to a requirement to appraise “reasonable spatial strategy alternatives”. This conclusion is reached with reference to the legal requirement, as set out in the SEA Regulations, which is that reasonable alternatives must be defined taking into account the “objectives and geographical scope of the plan”.

2.5 The second section within Part 1 (Section 6 of the SA Report) then explains a step-wise process to arrive at reasonable spatial strategy alternatives, with sign-posts to supporting work contained within a separate Technical Annex to the SA Report. The aim of Section 6 was to meet the legal requirement to present “an outline of the reasons for selecting the alternatives dealt with”.

2.6 Within Section 6, the first sub-section of note is Sub-section 6.3, as it describes key strategic (or ‘top down’), inputs to the establishment of reasonable spatial strategy alternatives, including broad strategy for growth at villages, which emerged following the 2016 Draft Plan consultation.

³ There is no need to recap on work completed in 2015 and 2016, as this work fed-into and was superseded by work completed in 2017, whilst there is no need to recap on work completed in 2019 because, as discussed in Section 1.1, main modifications relating to site MMO006 were screened-out of the SA process at this stage.

- 2.7 Also of note is Sub-section 6.4, which explains that, as a 'bottom-up' input to the establishment of reasonable spatial strategy alternatives, all of the site options reasonably in contention for allocation were subjected to analysis via several different work-streams. The key work-stream was the Housing and Economic Land Availability Assessment (HELAA) led by the Council, and another work-stream of note involved GIS analysis undertaken by AECOM, the findings of which were reported in the final section of the Technical Annex to the SA Report.
- 2.8 Finally, and of particular note, is Sub-section 6.5, and specifically Paragraph 6.5.56. This paragraph, when read alongside Table 6.5 and the analysis presented within the Maids Moreton section of the Technical Annex to the SA Report, aims to explain why it was reasonable to 'hold constant' the approach to growth at Maids Moreton (and all other medium-sized villages) across the reasonable spatial strategy alternatives. This decision, and the analysis that informed it, is explored further below, within **Section 3** and **Section 4** of this Note.

2.9 Appraising the Proposed Submission Plan and preparing the SA Report in 2017

- 2.10 Part 2 of the SA Report is also relevant, as it presents an appraisal of the Proposed Submission Plan as a whole and, as part of this, makes a number of points in respect of the strategy for Maids Moreton, notably:
- Paragraph 9.2.4 – introduces the spatial strategy, explaining that the effect of allocating Site MMO006 will be that the housing stock of the village increases by 47% over the plan period, which is a level of growth notably higher than any other medium sized village.
 - Paragraph 10.2.3 – highlights a biodiversity sensitivity on the basis that Site MMO006 is within 600m of Foxcote Reservoir SSSI. This issue is also raised within the appraisal summary.
 - Section 10.11 – highlights an issue in respect of Wastewater Treatment Works capacity at Buckingham and Maids Moreton.
 - The final Part of the SA Report is Part 3; however, this simply discusses next steps and does not include any discussion of Site MMO006 or Maids Moreton.

3 REFRESHED ANALYSIS OF SITE MMO006

- 3.1 As discussed above, Paragraph 6.5.56 of the SA Report signposted to an appraisal of reasonable alternatives for Maids Moreton presented within the Technical Annex to the SA Report. Specifically, the Technical Annex presented an appraisal of the following alternatives (emphasis added):
- 1) Nil allocations
 - 2) Allocation for 15 homes at MMO001
 - 3) Allocations for 22 homes at MMO004 and MMO005
 - 4) Allocations for 37 homes at MMO001, MMO004 and MMO005
 - 5) Allocation for 170 homes at **MMO006**.
- 3.2 It is not the intention of this SA Note to re-run the appraisal of reasonable alternatives for Maids Moreton presented within the Technical Annex to the SA Report (2017). This is because the Local Plan Inspector has not given any indication of a need to do so.
- 3.3 Rather, presented below is a stand-alone appraisal of proposed allocation MMO006. The appraisal seeks to build-upon the analysis presented within the SA Report, taking into account latest evidence, including evidence submitted as part of outline planning application 16/00151/AOP (170 homes at Site MMO006). Whilst it is recognised that the

scheme is still feasibly subject to change, in practice the plans for the site are not likely to change, given the resolution to grant planning permission (subject to S106).

- 3.4 It is worth stating that the step of presenting detailed SA analysis of a site option in isolation is unusual, in that it has not been undertaken for other sites through the VALP SA process, and is not typically undertaken as part of Local Plan SA work, in AECOM's experience.
- 3.5 As per all recent SA work completed for the VALP, the appraisal is presented under 12 sustainability topic headings (the 'SA Framework').

3.6 Biodiversity

- 3.7 Appraisal work completed in 2017 served to suggest that Site MMO006 is associated with a degree of constraint, given that the site is located approximately 600m to the south of Foxcote Reservoir SSSI (which is accessible and managed as a nature reserve). On this basis, Option 5 (Allocation for 170 homes at MMO006), of the five alternatives for Maids Moreton appraised within the SA Report Technical Annex, was identified as the poorest performing.
- 3.8 However, the SA Report did not go as far as to suggest that development would lead to a significant negative effect in terms of biodiversity and the latest situation is that concerns raised in 2017 are now somewhat allayed, in light of the latest available evidence.
- 3.9 In particular, there is a need to account for the fact that Natural England raised 'no objection' when consulted on outline planning application 16/00151/AOP in 2019. Whilst it is recognised that Natural England's view was "based on the submitted plans", which are feasibly subject to change, in practice the plans are not likely to change, given that the Council has now resolved to grant planning permission subject to S106.
- 3.10 Biodiversity is also a focus of discussion across Paragraphs 10.71 to 10.75 of the Officer's Report to Committee that served to inform the Council's decision on application 16/00151/AOP, with the conclusion reached that development should lead to a net gain in biodiversity (presumably at the scale of the site itself). This is not necessarily a reason to suggest that Site MMO006 stand-outs as performing particularly well in biodiversity terms, relative to other VALP site options; however, it is an indication that the site does not stand-out as constrained.
- 3.11 In conclusion, the concerns raised in 2017 are now largely allayed.

3.12 Climate change adaptation

- 3.13 Appraisal work completed in 2017 did not highlight any concerns in respect of flood risk, which is a primary climate change adaptation consideration, and no concerns were raised in the subsequent Officer's Report to Committee that served to inform the Council's decision on application 16/00151/AOP.
- 3.14 In conclusion, the site is not associated with any noticeable concerns or opportunities.

3.15 Climate change mitigation

- 3.16 Appraisal work completed in 2017 did not highlight any particular issues or opportunities in respect of climate change mitigation. N.B. the focus of consideration was in respect of minimising per capita emissions from the built environment, recognising that transport emissions are appropriately considered under the 'Transport' heading of the SA Framework (see below).

- 3.17 The latest situation is that limited further evidence is available, with climate change mitigation not having been an explicit focus of the Officer's Report to Committee that served to inform the Council's decision on application 16/00151/AOP. The Design and Access Statement (DAS) submitted alongside the application commits to "highly insulated walls, floor and roof; energy efficient boilers and double glazed windows"; however, these are all more-or-less standard design features, and there is no discussion of achieving an overall CO₂ emissions standard that exceeds building regulations, with the DAS adding that "the requirements for PV panels will be confirmed at the detailed design stage".
- 3.18 In **conclusion**, it is certainly fair to highlight that development at Site MMO006 will not serve to realise any particular opportunities in terms of minimising per capita CO₂ emissions from the built environment; however, that is not to suggest that the site stands-out as performing poorly in this respect. Competing site options of a similar scale, or smaller, would not necessarily be expected to perform any better, and even significantly larger sites, which benefit from economies of scale that in theory can lead to opportunities, can fail to realise these opportunities in practice.

3.19 Communities

- 3.20 Appraisal work completed in 2017 reached the following conclusion:
- "In addition to housing, MMO006 would deliver Outdoor Playing Space and Equipped Play Facilities, responding to the concern raised by the 2017 'Open Space, Sports and Recreation Needs for Aylesbury Vale' audit, which found there to be a lack of a suitably sized central public open space as well as no Neighbourhood Equipped Area of Play (NEAP) in Maids Moreton. Other [competing sites at Maids Moreton] would likely not deliver any new or upgraded strategic community infrastructure. However, a disbenefit of MMO006 is that it is located at the northern edge of the village, i.e. the edge furthest from Buckingham (and also Maids Moreton primary school, which is on the edge of Buckingham). The site would be c. 1.5 km from Buckingham town centre."*
- 3.21 Important further evidence comes from the analysis presented within the Officer's Report to Committee, that served to inform the Council's decision on application 16/00151/AOP. Points made under the heading "Promoting healthy and safe communities" include:
- Open / play space - the development proposes the provision of open space on site including a play space and this could be a combined LEAP and NEAP, the details of which would come forward at the reserved matters stage.
 - Primary education - Buckingham County Council (BCC) projects that existing surplus capacity in local primary schools will be taken up following delivery of existing permitted sites. Therefore, BCC will require the application scheme to make a contribution towards the expansion of primary school facilities at Buckingham Primary School/Maids Moreton School.
 - Secondary education - pupil growth from current outstanding housing permissions is projected to put significant increased pressure on secondary schools – with a deficit of places projected. BCC's current plan to meet the projected rising demand is to expand capacity at Buckingham Secondary School and a financial contribution towards this is required.
 - Public rights of way - a PRoW passes through the site, which is discussed further below. The Officer's Report highlights that development would improve the quality of the footway itself, making it more easily accessible, and notes no objection from the BCC Rights of Way Officer.
 - Health facilities - whilst the proposed development would place a demand on local health facilities, no comments were received on the application from the Clinical Commissioning Group (CCG) and funding of such facilities is through central government.

3.22 In **conclusion**, the discussion of pros and cons from 2017 still broadly holds true. It is also fair to add, at this stage, that both the pros and cons discussed in 2017 are of limited significance. At the current time the latest evidence also serves to highlight a concern in respect of school capacity, in that there is a need to rely on mitigation, i.e. funding for school expansion, which can be associated with a degree of risk. However, there is little reason to suggest that competing sites perform any better, in the sense that there is surplus capacity in local schools.

3.23 Economy

3.24 Appraisal work completed in 2017 was not able to differentiate between the merits of the competing growth options for Maids Moreton, stating: *“It is not clear that there is an ‘employment’ opportunity associated with housing growth at Maids Moreton, albeit there are a number of businesses located at the small employment park to the north of the village.”*

3.25 More recently, the Officer’s Report to Committee, that served to inform the Council’s decision on application 16/00151/AOP, stated: *“It is considered that there would be economic benefits in terms of the construction of the development itself, its operation and the resultant increase in population contributing to the local economy. It is therefore considered the economic benefits of the scheme should attract considerable positive weight in the overall planning balance.”* However, this conclusion is generic, rather than site-specific, hence there is no reason to suggest that the site performs any better or worse than other competing VALP site options.

3.26 In **conclusion**, the site is not associated with any notable concerns or opportunities.

3.26 Heritage

3.27 Appraisal work completed in 2017 served to highlight a growth strategy for Maids Moreton involving a focus of growth at Site MMO006 as performing well relative to certain other growth options, namely options that would allocation of site MMO001, which falls within the Maids Moreton Conservation Area (CA).

3.28 Important further evidence comes from the analysis presented within the Officer’s Report to Committee, that served to inform the Council’s decision on application 16/00151/AOP. Points made under the heading “Conserving and enhancing the historic environment” include:

3.29 Maids Moreton Conservation Area and listed buildings – whilst the site is visually well-separated from the Conservation Area, development will necessitate highway works in the form of a mini roundabout which will have an impact on the setting of three listed buildings, albeit in the context of an established highway network and existing modern housing on this edge of the village. The conclusion reached is that the highway works will have a “minor negative effect” on the significance of the heritage assets and, as such, the Council’s Historic Buildings Officer did not raise an objection to the planning application.

3.30 Archaeology – detailed investigations completed by the planning applicant have emphasised high potential for evidence of Roman settlement and agricultural activity across all three fields, as well as prominent evidence of later medieval agricultural ridge and furrow cultivation. There is also the potential for evidence of prehistoric activity in the eastern field. As such, a condition was applied to the Council’s resolution to grant planning permission (subject to S106), requiring the developer to secure appropriate investigation, recording, publication and archiving of the results.

3.31 In **conclusion**, the site is subject to a notable degree of constraint; however, there is little reason to suggest that this constraint renders the site unsuitable for allocation/development. Furthermore, any decision not to support development at this site, and instead to support one or more of the other competing site options locally, could result in an overall greater degree of impact to the historic environment.

3.32 Housing

- 3.33 Appraisal work completed in 2017 was not able to differentiate between the merits of the competing growth options for Maids Moreton, although there was tentative and marginal support for a strategy involving a focus of growth at Site MMO006 on the basis that, as a larger site, there would be good potential to deliver a good mix of housing, to include affordable housing.
- 3.34 More recently, the Officer's Report to Committee, that served to inform the Council's decision on application 16/00151/AOP, stated: *"In respect of affordable housing the scheme does meet the thresholds for securing such provision on site as outlined in AVDLP policy GP.2 which refers to the provision of 25 dwellings or more on a site area of 1 ha or more. The Design and Access Statement confirms that 30% provision would be provided, evenly dispersed across the site and tenure blind. A S106 would need to secure this provision. This matter should be afforded significant positive weight in the planning balance."*
- 3.35 In **conclusion**, recent evidence serves to bolster the conclusion reached in 2017, namely that the site performs well in terms of delivering affordable housing; however, it remains the case that other alternative development strategies for Maids Moreton might perform equally well.

3.36 Landscape

- 3.37 Appraisal work completed in 2017 reached the following conclusion:
"MMO001 to the south is constrained in landscape terms, in that it acts as a green buffer between Maids Moreton and Buckingham, as discussed above. It is also fair to conclude that the large site to the north (MMO006) gives rise to landscape concerns, particularly as it would be highly visible from a public footpath leading north from the village (in the direction of Foxcote Reservoir; however, there might be an alternative, preferable route); however, the Aylesbury Landscape Study (2017) does not raise any particular concerns, concluding that: "Potential to develop 65% of the site (eastern two thirds), with the western third undeveloped to minimise impact on Foxcote Valley LCA.""
- 3.38 Important further evidence comes from the analysis presented within the Officer's Report to Committee, that served to inform the Council's decision on application 16/00151/AOP, which draws the following conclusions in respect of landscape and visual impacts:
*"It is accepted that there will be significant adverse visual impacts from the development but these will be in the immediate vicinity of the site and there is scope for the existing relationship between the settlement and the open countryside to be visually enhanced in line with the Landscape Character Assessment guidance.
... Overall it is considered that acknowledging the scale of development proposed and the mitigation indicated, that the impact on the landscape character area, on the settlement character and the visual impact of the development itself should be afforded moderate negative weight in the planning balance."*
- 3.39 With regards to the specific matter of impacts to views from the public footpath, the Officer's Report states:
"The existing footpath is proposed to be upgraded, in terms of being surfaced and lit, along the section between The Pightle and Manor Park properties which would encourage the increased ease of movement for all users. The footpath through the application site would run through green spaces and would exit onto Foscombe Road so whilst there would be a change in the experience of users of the footpath from where the footpath currently runs through the agricultural fields, it is not considered that this would be unacceptable given the adjacent landscape/woodland belt proposed."
- 3.40 In **conclusion**, there are clearly landscape sensitivities, given current open views across the site from the footpath, and also potentially given topography and landscape

character, with the Foscott / Foxcott Valley to the east (described as having a “slightly remote hidden character”), and a raised plateau landscape to the west (although the proposed landscape buffer at the western extent of the site reduces concerns in respect of ‘sprawl’). However, there is little reason to suggest that this constraint renders the site unsuitable for allocation/development. Furthermore, as was shown to be the case through the 2017 appraisal, any decision not to support development at this site, and instead to support a combination of the other competing site options locally, could lead to an overall comparable degree of landscape impact.

3.41 Natural resources

3.42 Appraisal work completed in 2017 reached the following conclusion:

“There is a need to protect agricultural land, and in particular land that is ‘best and most versatile’ (BMV), as defined by the NPPF. MMO005 (Options 3 and 4) and MMO006 (Option 5) have been surveyed and found to comprise grade 3a quality land, which is classified as BMV. MMO004 (Options 3 and 4) has been surveyed and found to comprise grade 3b quality land, which is non-BMV. The final site, MMO001 (Options 2 and 4) has not been surveyed. On balance, it is appropriate to ‘flag’ Option 5 as performing relatively poorly; however, it is recognised that there is uncertainty, in the absence of consistent surveying.”

3.43 Subsequently, Site MMO006 was resurveyed, which served to confirm that the agricultural land present within the site is of grade 3a quality. This second survey was not available at the time of the Officer’s Report to Committee that served to inform the Council’s decision on application 16/00151/AOP. As such, the Officer’s Report stated:

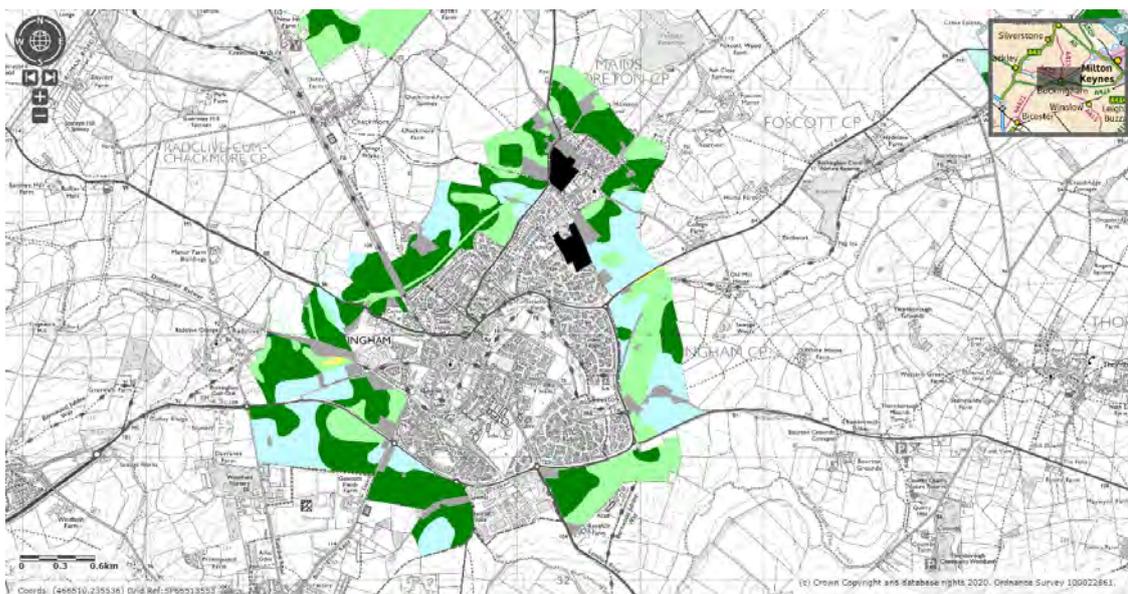
“Further detail is to be submitted by the applicants in respect of the agricultural grading of the land and this will be reported to Members. At the current time, whilst the actual grading of the land has not been provided by the applicants, the maps on the Natural England website indicate that it is moderate to good quality land (grade 3 with some 4). Having regard to the size of the site, but in the absence of detailed information, this matter must currently be afforded very limited negative weight in the planning balance.”

3.44 Subsequently, a Corrigendum to the Officer’s Report was published on 19th Feb 2019, with paragraph 6 stating:

“Having regard to the findings of the report, it is accepted that the development would result in the loss of best and most versatile (bmv) agricultural land. However, having regard to the size of the site and the extent of bmv land lost, it is not considered that this would represent a significant loss to the District. As such it is considered that this matter should continue to be afforded very limited negative weight in the planning balance...”

3.45 In **conclusion**, as per the conclusion reached in 2017, there is a need to flag Site MMO006 as notably constrained in terms of agricultural land objectives. Were a decision to be made that development of the site should not be supported, and instead development should be supported at one or more of the other competing site options around the edge of Buckingham or Maids Moreton, then it could prove challenging to identify a suitable site that is less constrained – see Figure 3.1. However, were the decision made to replace Site MMO006 with one or more sites in another part of the District, then there would be good potential to identify a suitable site that is less constrained.

Figure 3.1: Screenshot from Magic.gov.uk showing that almost all land surrounding Buckingham has been classified under the “Post 1988 Agricultural Land Classification” as either grade 2 (blue), grade 3a (dark green) or grade 3b (light green)



3.46 Pollution

3.47 Appraisal work completed in 2017 reached the following conclusion:

“Wastewater treatment is the primary pollution issue at Buckingham / Maids Moreton, as the local Wastewater Treatment Works (WwTWs) is at or near capacity, and breach of capacity can result in significant pollution to the water environment. The recent Water Cycle Study (2017) concluded that capacity at the WwTW is a constraint to growth, although there is good potential to deliver capacity upgrades as necessary, ahead of housing growth. It is appropriate to ‘flag’ risk associated with high growth.”

3.48 The latest situation is that, whilst the matter of WwTW capacity was not discussed within the Officer’s Report to Committee that served to inform the Council’s decision on application 16/00151/AOP, further evidence has been received from two key stakeholders:

- Anglian Water – is the water company with responsibility for wastewater treatment. The representation received at the Regulation 19 stage raised no issues in respect of MMO006, or the proposed growth strategy for Buckingham and Maids Moreton, and requested only that a reference to surface water drainage should be added to the site specific policies. This reference was then subsequently added at the main modifications stage.
- The Environment Agency (EA) – is the regulator with responsibility for the quality of water within the rivers that receive treated wastewater (and which can be at risk of major pollution events when WwTW capacity is breached). The EA raised concerns in respect of water quality and capacity at the Buckingham WwTW in their representation at the Regulation 19 stage; however, these concerns were subsequently addressed through correspondence and work to update the Local Plan Water Cycle Study (WCS) in 2019.

3.49 In **conclusion**, the concerns raised in 2017 are now largely allayed.

3.50 Transport

3.51 Appraisal work completed in 2017 identified Option 5 for Maids Moreton, which involved a focus of growth at Site MMO006, as performing poorly not because of any particular constraint associated with the site (although the appraisal does note that it is located at the furthest point of the village from Buckingham town centre) but because of Option 5 representing a high growth strategy for Maids Moreton. The appraisal concluded: *“Maids*

Moreton is a lower order settlement, and hence inherently less suited to receiving growth, from a transport perspective.”

- 3.52 Important further evidence comes from detailed analysis presented within the Officer’s Report to Committee that served to inform the Council’s decision on application 16/00151/AOP, which draws the following conclusions in respect of transport issues and impacts:

“In acknowledging the significant local objection to the development of the site, the Highway Authority have spent considerable time in assessing the details of the access to the site and the level of traffic generation that would result and its impact on highway safety and convenience.... Having regard to the above matters and the extensive mitigation put forward for the development... it is considered that... this matter should be afforded neutral weight in the planning balance.”

- 3.53 In **conclusion**, the point made in 2017 regarding an inherent draw-back to a higher growth strategy at Maids Moreton still stands. Maids Moreton is a lower order settlement and hence is not well suited to a higher growth strategy, from a transport perspective, and it is also noted that the site is located at the northern extent of the village, which is the part of the village furthest from Buckingham (a higher order settlement) to the south. However, concerns are somewhat allayed in light of the discussion presented within 2019 Officer’s Report, which describes detailed work having been completed to identify and realise opportunities for the development to deliver transport infrastructure upgrades, including in respect of walking/cycling infrastructure.

3.54 **Waste**

- 3.55 This was identified as a ‘non-issue’ through appraisal work completed in 2017, in that Site MMO006 is not associated with any notable constraint or opportunity, in respect of supporting sustainable waste management. This conclusion remains valid.

4 **CONCLUSIONS**

- 4.1 In conclusion, the appraisal serves to highlight that there are constraints and draw-backs to development at Site MMO006, perhaps most notably in respect of the loss of best and most versatile agricultural land. However, this does not necessarily serve to indicate that the site is unsuitable for allocation, recognising that all site and strategy options will have drawbacks.