

## Sustainability Appraisal: RAF Halton revised scoring and impact on soundness

### 1. Overview

- 1.1. At Hearing Session 21 of the Vale of Aylesbury Local Plan (VALP) Examination in Public on Tuesday 17 July, during the discussion over the suitability of RAF Halton as a residential allocation, reference was made by Crest Strategic Projects (CSP) to their Hearing Statement and Regulation 19 representations on the Sustainability Appraisal (SA) supporting the VALP. This reference included the point that the scoring of RAF Halton was incorrect on a number of topics.
- 1.2. Aylesbury Vale District Council (AVDC) were unable to answer any of the queries relating to the SA that were raised during the session as AECOM, the company that prepared the SA for the Council, were not present. The Inspector asked what the incorrect scoring referred to and whether the subsequent appraisal of reasonable options would make the allocation unsound.
- 1.3. In response to the Inspector's request, CSP have prepared this summary paper that sets out the omission of RAF Halton from the SA work supporting the Draft VALP, an appraisal of the key topics of landscape and heritage, the scoring errors that were highlighted in the SA Technical Appendix supporting the submitted VALP, and finally re-appraising the options for growth that were considered in the main SA document.
- 1.4. Within these options for growth, Options 1 and 2 included Shenley Park and not RAF Halton whilst Options 3 and 5 included RAF Halton but not Shenley Park. By choosing Option 3 (Halton, not Shenley), AVDC chose the option that ranked 7<sup>th</sup> out of 9, whereas Option 2 (Shenley not Halton) ranked 6<sup>th</sup>.
- 1.5. After re-scoring each option using the corrected RAF Halton scores, this would make the option for growth that was chosen by AVDC in the VALP as 9<sup>th</sup>, i.e. the **joint worst** performing of the nine they assessed. It is acknowledged that the SA does not solely determine the choice made by the VALP, however the choice made being based on incorrect scoring in the SA has therefore been made on a false premise and is unsound. This cannot therefore be considered a sound, justified and effective approach to sustainable place making.

### 2. Draft VALP SA (July 2016)

- 2.1. Lepus Consulting were instructed by AVDC to undertake a Sustainability Appraisal (SA) of the Draft VALP (September 2015). A document presenting the results of the reasonable alternatives assessments for potential development sites to be included in the VALP was also prepared (July 2016).
- 2.2. It is important to note that RAF Halton was **NOT** assessed at this stage of the plan preparation process as it was not being promoted or considered as a residential allocation. It is also important to note that Shenley Park (WHA001) was assessed and on the key topic of landscape, which is used later in the SA process by AVDC to bring in HAL003 at the expense of WHA001, was scored as '**Minor Adverse**'. As noted in paragraph 2.2.5 of Technical Appendix 4 of the Regulation 19 representations, CSP agreed with this score.

- 2.3. Carrying out a similar exercise on RAF Halton would lead to a score of **'Moderate Adverse'**, i.e. worse than WHA001. RAF Halton is heavily constrained in landscape terms by both designations and natural and built features. The designations include being fully within Metropolitan Green Belt, adjacent to the AONB (and within the AONB setting), containing parts of Halton House Registered Park & Garden and falling within two local landscape designations: an Area of Attractive Landscape and a Local Landscape Area. The site also includes many important landscape features including numerous mature trees with high amenity value worthy of preservation, avenue and areas of woodland and varied landforms on the lower slopes of the Chilterns.
- 2.4. The SA itself (page 149) notes RAF Halton as being *'inherently sensitive'* in landscape terms on the basis that it is adjacent to the AONB and next to the steep wooded slope to the east leading to Coombe Hill/Wendover Woods. This is a view that was ratified in a recent appeal decision (APP/J0405/W/16/3158833) on a site just over 1km to the west of RAF Halton. The Inspector considered that the adverse impacts of residential development on landscape character and impact on settlement pattern would demonstrably outweigh the benefits of additional housing. It is therefore robust to conclude that RAF Halton performs worse in landscape terms than Shenley Park.
- 2.5. In relation to heritage, as noted in paragraph 2.2.3 of Technical Appendix 4 of the Regulation 19 representations, CSP agree with the score of **'Moderate Adverse'** for Shenley Park, noting that there are no listed buildings, locally listed buildings or SAMs within the site boundary, nor is the site within a Conservation Area, however there are potential archaeological interests nearby.
- 2.6. Paragraphs 2.3.4 & 2.3.5 of the same document consider RAF Halton to be **'Major Adverse'** in relation to heritage. As borne out during the hearing session and supported by objections from Historic England, the archaeological/heritage issues would be **considerably** more complicated for RAF Halton compared to Shenley Park and substantial and lengthy programmes of archaeological and heritage works would be required for RAF Halton, these include desk based assessment, building recording, geophysical survey, trial trenching, consequent mitigation excavation in addition to a very exhaustive Heritage Impact Assessment process and associated mitigation planning. It is therefore robust to conclude that RAF Halton performs worse in heritage terms than Shenley Park.
- 2.7. This comparison between the two sites becomes more important in relation to soundness as you move into the Sustainability Appraisal and Technical Appendix that were published in support of the VALP.

### 3. Submission VALP SA Technical Annex (Examination document reference CD/SUB/007)

- 3.1. The Technical Annex of the SA takes the level of assessment a step further, and scores each site either red, amber or green depending on the location and constraints of the site in question against a number of criteria. Having appraised the thresholds of the criteria in the technical appendix, a number are incorrect for both Shenley Park and RAF Halton.

- 3.2. The scores corrected for RAF Halton consist of an increase from amber to red for Common Land, Bio & Geo Important Areas, Local Wildlife Site, Listed Buildings and Scheduled Monument. The original, incorrect scoring reflects both the lack of information and over-simplification of a number of issues, including heritage, by AVDC in relation to RAF Halton. As was demonstrated during the hearing session, the few paragraphs of evidence to justify the allocation of 1,000 were only presented in response to one of the Inspector's questions, not as part of the preparation of the VALP.
- 3.3. Taking the corrected scores for RAF Halton these show 42% of the 31 different topics ranked as red, with a further 29% as amber (71% combined), compared to 19% and 36% respectively for Shenley Park (55%).
- 3.4. **The two assessments discussed clearly demonstrate that RAF Halton performs worse than Shenley Park against a range of sustainability topics underpinning the VALP, notably heritage and landscape.**

**4. Submission VALP SA (Examination document reference CD/SUB/004)**

- 4.1. To answer the Inspector's question of whether this incorrect scoring makes any difference, i.e. does it render the plan unsound, CSP believe there are two areas where the incorrect scoring of RAF Halton makes both the allocation and plan unsound.
- 4.2. The first is within AVDC's generation of reasonable alternatives. Section 6.6 of the VALP SA introduces this creation and evaluation of 'reasonable alternatives' to help deliver the spatial strategy for the district. The generation of options is quite simply based on a flawed and incorrect landscape assumption relating to Shenley Park (WHA001), and the document then compounds this error by bringing in a worse performing site, RAF Halton (HAL003), in landscape terms as a replacement To reference the chronological parts of the SA as AVDC were unable to do so during the hearing session:

*'6.5.17: A) WHA001 (2,000 homes) to the west – HELAA suitable; however comprises a sensitive landscape gap between MK and Whaddon;*

*'6.5.35: There is also a need to consider higher growth options, i.e. options involving allocation of HELAA unsuitable sites...*

***A) Halton Camp...**The Camp is divided from the village by a narrow strip of woodland, and, at c.1km distant from the village centre, there would be potential to walk/cycle. The site is 'washed over' by the Green Belt; however, the Buckinghamshire Green Belt Assessment (2016) concluded that the extent of built development means that its contribution to Green Belt purposes is limited. The AONB is adjacent; however, the extent of existing built development and the extent of woodland in the vicinity reduces landscape concerns.*

*'6.6.9: Next there is a need to consider which HELAA suitable sites might be removed from the strategy. The following two approaches were identified –*

***A) Remove those HELAA suitable sites that conflict with a Neighbourhood Plan, i.e. support do minimum at Buckingham, Haddenham and Winslow (Option 2)***

***B) Remove the HELAA suitable site on the edge of MK, as it is subject to a significant landscape constraint, i.e. support do minimum at MK'***

*6.6.11: **(B)** results in 2,000 fewer homes, leaving a strategy providing for 3.3% below the target. This is not a reasonable option. In order to make up the shortfall, there are two stand-out options -*

- *Support the Wendover higher growth option, thereby providing for 0.2% above the target. This is reasonable (Option 3).*
- 4.3. The SA continually refers to 'WHA001 at the MK edge is 'swapped' for Halton Camp' (pages 137, 142, 143, 145, 147, 149, 151 & 154 of the SA). The only reason given for the exclusion of WHA001 is that it is subject to a significant landscape constraint. There is no robust evidence provided in either the SA or the Technical Annex to support this reason. It also remains perplexing that HELAA suitable sites are taken out and replaced with unsuitable HELAA sites adjacent to settlements that are further down the settlement hierarchy in the generation of options.
- 4.4. Having generated the nine alternative options, the SA then considers each against the sustainability topics, categorises the performance using red, amber and green to denote the significance of effects, and ranks alternatives in order of that performance.
- 4.5. Table 7.1 from the SA, reproduced overleaf, demonstrates this categorisation and ranking of the options for growth. Options 1 and 2 include Shenley Park but not RAF Halton, Options 3 and 5 include RAF Halton but not Shenley Park, Option 4 includes growth at Aston Clinton but neither Shenley Park or RAF Halton and Options 6 to 9 concentrate all growth in a single location. Option 3, which includes RAF Halton, is the Option taken forward into the VALP by AVDC.

Table 7.1: Summary spatial strategy alternatives appraisal findings

| Topic                     | Rank of performance / categorisation of effects |   |  |  |  |  |  |  |  |
|---------------------------|---|---|--|--|--|--|--|--|--|
|                           | Option 1<br>All HELAA<br>suitable               | Option 2<br>Reduce<br>in-line<br>with NPs | Option 3<br>Nil at MK<br>edge;<br>bring in<br>Halton<br>Camp | Option 4<br>Nil at MK<br>edge;<br>bring in<br>Aston<br>Clinton | Option 5<br>Nil at MK<br>edge;<br>bring in<br>Halton<br>Camp &<br>Aston<br>Clinton | Option 6<br>Do<br>minimum<br>except<br>MK edge | Option 7<br>Do<br>minimum<br>except W<br>of<br>Had'ham | Option 8<br>Do<br>minimum<br>except E<br>of<br>Had'ham | Option 9<br>Do<br>minimum<br>except N<br>of<br>Winslow |
| Biodiversity              | 3   | 2   | 3  | 3  | 3  | 2  | ★  | ★  | ★  |
| Climate change mitigation | 2   | 2   | 2  | 2  | 2  | ★  | ★  | ★  | ★  |
| Climate change adaptation | =   | =   | =  | =  | =  | =  | =  | =  | =  |
| Community                 | 4   | 4   | ★  | 3  | 2  | ★  | ★  | ★  | ★  |
| Economy                   | ★   | ★   | 2  | 2  | 2  | ★  | ★  | 2  | ★  |
| Heritage                  | 4   | 3   | 3  | 3  | 3  | ★  | 2  | 2  | ★  |
| Housing                   | ★   | 5   | 3  | 2  | ★  | 4  | 4  | 4  | 5  |
| Landscape                 | 2   | 2   | 3  | 2  | 3  | 4  | ★  | ★  | ★  |
| Natural resources         | 2   | ★   | 2  | 2  | 2  | ★  | 2  | 2  | 2  |
| Pollution                 | 2   | ★   | 2  | 2  | 2  | 2  | ★  | ★  | ★  |
| Transport                 | 3   | ★   | ★  | ★  | ★  | 3  | 2  | 3  | ★  |
| Waste                     | =   | =   | =  | =  | =  | =  | =  | =  | =  |

4.6. Using the results presented by AVDC in Table 7.1, a combined ranking for each option can be produced which generates the table in paragraph 3.2.19 of Technical Appendix 4 of CSP’s Regulation 19 representation, reproduced below:

**Table 1 – Summary of combined performance scores in VALP SA**

|                             | Option                          |                                 |                                 |  |   |                       |                              |                              |                             |
|-----------------------------|---------------------------------|---------------------------------|---------------------------------|--|---|-----------------------|------------------------------|------------------------------|-----------------------------|
|                             | Shenley Park but not RAF Halton | Shenley Park but not RAF Halton | RAF Halton but not Shenley Park | Aston Clinton but not Shenley Park or RAF Halton | RAF Halton & Aston Clinton but not Shenley Park | All growth at MK Edge | All growth West of Haddenham | All growth East of Haddenham | All growth north of Winslow |
|                             | 1                               | 2                               | 3                               | 4  | 5   | 6                     | 7                            | 8                            | 9                           |
| <b>Score</b>                | 24                              | 22                              | 22                              | 22   | 21  | 20                    | 16                           | 18                           | 15                          |
| <b>Top ranks/gold stars</b> | 2                               | 4                               | 2                               | 1  | 2   | 5                     | 6                            | 5                            | 8                           |
| <b>OVERALL RANK</b>         | <b>9th</b>                      | <b>6th</b>                      | <b>7th</b>                      | <b>8th</b>                                       | <b>5th</b>                                      | <b>4th</b>            | <b>2nd</b>                   | <b>3rd</b>                   | <b>1st</b>                  |

4.7. It should be noted that although the SA concludes in this appraisal that those options proposing concentrated growth in a single location (Options 6 to 9) perform best on a number of sustainability topics, this is primarily because the locations proposed are relatively unconstrained. It also overlooks considerations relating to the need to weight some growth in different parts of the district and a need to allocate a mix of sites including those able to deliver in the early part of the plan period.

4.8. AVDC note in paragraph 6.6.12 of the SA that these are ‘more extreme ‘book end’ options that involve the Do Minimum growth options at all locations except one’ and in paragraph 8.2.2 conclude that ‘a significant factor which will influence which of these options is most suitable will be the route of the proposed Oxford to Cambridge Expressway. The exact route for this is not decided yet so it is considered premature to make any decision on a new settlement until the route is clarified. A new settlement might be required in a Local Plan review, by which time it should be clear what the proposed route of the expressway will be and an informed decision can then be made’. Consequently, Options 6-9 were rejected, leaving consideration focusing on Options 1-5. In Section 8 of the SA, pages 61-62, there was no commentary as to the specific reasons why options 1, 2, 4 & 5 were rejected, just a note at paragraph 8.2.3 that ‘whilst the alternatives appraisal has highlighted some drawbacks with Option 3 it is considered the most sustainable of the options.’

**Incorrect scoring of VALP SA**

- 4.9. There are a number of areas of clear inconsistent scoring in the VALP SA which need to be corrected. Option 3, which includes RAF Halton, ranks 7<sup>th</sup> out of 9. However as this paper and previous representations has demonstrated, the SA has incorrectly assessed RAF Halton against key topics including landscape, heritage and economy. As such it is necessary to re-assess the rankings provided by AVDC in Table 7.1 for Options 3 and 5 that include RAF Halton.
- 4.10. For the Economy topic, Options 3 and 5 both rank at 2, which is the same as Option 4 which does not involve the loss of an employment site that provides around 2,000 jobs, as Halton is and our previous representations and hearing statements, and indeed the hearing session itself, set out. It is therefore erroneous to rank these options the same and Options 3 and 5 should be increased to 3.
- 4.11. For Heritage, Options 3 and 5 rank at 3, the same as Options 2 & 4. Option 1 is the worst rank at 4. The only difference between Option 1 and Option 3 is that Shenley Park is replaced by RAF Halton. Given the incorrect scoring of RAF Halton on heritage and the fact it scores worse than Shenley Park in this regard, it is again erroneous to suggest that Option 3 can rank higher than Option 1. Therefore Options 3 and 5 should be increased to 4.
- 4.12. Finally on Landscape, it is essential to note that Options 3 and 5 which include RAF Halton rank 3, whilst Options 1 and 2 that include Shenley Park rank 2. While this is appropriate (i.e. RAF Halton is indeed worse in landscape terms) this is totally contradictory to the generation of reasonable alternatives where Shenley Park was removed from Option 2 and replaced with Halton to generate Option 3 on landscape grounds. AVDC themselves recognise that the Options they generated including RAF Halton perform worse on landscape grounds.
- 4.13. Using the rescoring and applying them to the table produces a different result as depicted below:

**Table 2 – Summary of re-scored combined performance scores in VALP SA**

|                      | Option                          |                                 |                                 |  |   |                       |                              |                              |                             |
|----------------------|---------------------------------|---------------------------------|---------------------------------|--|---|-----------------------|------------------------------|------------------------------|-----------------------------|
|                      | Shenley Park but not RAF Halton | Shenley Park but not RAF Halton | RAF Halton but not Shenley Park | Aston Clinton but not Shenley Park or RAF Halton | RAF Halton & Aston Clinton but not Shenley Park | All growth at MK Edge | All growth West of Haddenham | All growth East of Haddenham | All growth north of Winslow |
|                      | 1                               | 2                               | 3                               | 4  | 5   | 6                     | 7                            | 8                            | 9                           |
| Score                | 24                              | 22                              | 24                              | 22   | 23  | 20                    | 16                           | 18                           | 15                          |
| Top ranks/gold stars | 2                               | 4                               | 2                               | 1  | 2   | 5                     | 6                            | 5                            | 8                           |
| OVERALL RANK         | =8th                            | 5th                             | =8th                            | 6th  | 7th   | 4th                   | 2nd                          | 3rd                          | 1st                         |

- 4.14. Option 3, which was taken forward as the option for growth in the VALP, is now, correctly, seen to be the ***joint worst*** performing option from the list of nine reasonable alternatives. This simply cannot be considered a robust or sound approach for the VALP to take forward when virtually all other options assessed performed better when considered against a range of sustainability topics.
- 4.15. Further, as noted in paragraph 4.8, AVDC (correctly) did not consider Options 6-9 serious and realistic options at this time, therefore removing those from the scoring and concentrating on just Options 1-5. This re-iterates the point that Option 3 chosen is the worst performing. Table 3 using the SA scoring and Table 4 the corrected scoring demonstrate this below.

**Table 3 – Summary of combined (incorrect) performance scores in VALP SA of ‘realistic’ options**

|                      | Option                          |                                 |                                 |  |   |
|----------------------|---------------------------------|---------------------------------|---------------------------------|--|---|
|                      | Shenley Park but not RAF Halton | Shenley Park but not RAF Halton | RAF Halton but not Shenley Park | Aston Clinton but not Shenley Park or RAF Halton | RAF Halton & Aston Clinton but not Shenley Park |
|                      | 1                               | 2                               | 3                               | 4  | 5   |
| Score                | 24                              | 22                              | 22                              | 22   | 21  |
| Top ranks/gold stars | 2                               | 4                               | 2                               | 1  | 2   |
| OVERALL RANK         | 5th                             | 2nd                             | 3rd                             | 4 <sup>th</sup>                                  | 1st   |

- 4.16. As noted in paragraph 4.8, there was no commentary as to the specific reasons why options 1, 2, 4 & 5 were rejected, just a note that Option 3 was considered the most sustainable.

Table 4 – Summary of re-scored combined performance scores in VALP SA of realistic options

| Option               |                                 |                                 |                                 |  |   |
|----------------------|---------------------------------|---------------------------------|---------------------------------|--|---|
|                      | Shenley Park but not RAF Halton | Shenley Park but not RAF Halton | RAF Halton but not Shenley Park | Aston Clinton but not Shenley Park or RAF Halton | RAF Halton & Aston Clinton but not Shenley Park |
|                      | 1                               | 2                               | 3                               | 4  | 5   |
| Score                | 24                              | 22                              | 24                              | 22   | 23  |
| Top ranks/gold stars | 2                               | 4                               | 2                               | 1  | 2   |
| OVERALL RANK         | 4th                             | 1st                             | 5th                             | 2nd  | 3rd   |

4.17. To answer the Inspector’s question directly, the incorrect scoring of RAF Halton does make a difference and AVDC’s approach to taking forward Option 3 as the joint worst option in sustainability terms of all those assessed, and the worst performing of the realistic options, is unsound. As the SA records, RAF Halton was ‘swapped’ for Shenley Park at the Regulation 19 stage, and that has produced an unsound plan.

## 5. Alternative option

- 5.1 The final point CSP wish to make in this paper relates to an alternative option for growth not considered by AVDC. This is set out in detail in Section 4, pages 36-39 of Technical Appendix 4 of the CSP Regulation 19 representations. The nine options presented a broad spectrum of alternatives, but what was most apparent is the failure of the SA to consider '**reasonable alternatives**' relating to the allocation of housing at Buckingham, Winslow and Haddenham. All options considered involve either a large additional number in conflict with neighbourhood plans, or no further development in these locations.
- 5.2 CSP presented an 'Option 10', which had two clear benefits: firstly it is based on a realistic, deliverable and sustainable level of growth for the market towns of Buckingham and Winslow that is more in line with the adopted Neighbourhood Plan so better respecting localism. Secondly it removes the allocation at RAF Halton, which is subject to both a high level of uncertainty and also performs worse in sustainability terms than other sites that have been omitted from the plan, and replaces it with Shenley Park (as previously proposed in the Regulation 18 plan), which as demonstrated performs better against a wide range of topics.
- 5.3 The table on page 36 of Technical Appendix 4 shows that the housing number in this option would be 28,780 (+0.03% above the 28,770 target) and also when assessed and ranked in the same way as the other options against sustainability criteria would score 17 and position 3<sup>rd</sup>.
- 5.4 Undertaking the same exercise carried out in paragraph 4.15, namely scoring the rival Options 2 and 3 alongside our 'Option 10' produces the results shown in tables 5 and 6 below and the latter highlights that the Option 3 chosen by AVDC again performs worst:

Table 5 – Summary of combined (incorrect) performance scores in VALP SA of Options 2 and 3 compared to ‘Option 10’

| Option                      |                                 |                                 |  |
|-----------------------------|---------------------------------|---------------------------------|--|
|                             | Shenley Park but not RAF Halton | RAF Halton but not Shenley Park | Realistic growth at Buckingham & Winslow inc. Shenley Park |
|                             | 2                               | 3                               | ‘10’   |
| <b>Score</b>                | 22                              | 22                              | 17   |
| <b>Top ranks/gold stars</b> | 4                               | 2                               | 4  |
| <b>OVERALL RANK</b>         | 2nd                             | 3rd                             | 1st  |

Table 6 – Summary of re-scored combined performance scores in VALP SA of realistic options plus ‘Option 10’

| Option                      |                                 |                                 |  |
|-----------------------------|---------------------------------|---------------------------------|--|
|                             | Shenley Park but not RAF Halton | RAF Halton but not Shenley Park | Realistic growth at Buckingham & Winslow inc. Shenley Park |
|                             | 2                               | 3                               | ‘10’   |
| <b>Score</b>                | 22                              | 24                              | 17   |
| <b>Top ranks/gold stars</b> | 4                               | 2                               | 4  |
| <b>OVERALL RANK</b>         | 2nd                             | 3rd                             | 1st  |

5.5 Taking Option 10 forward instead of Option 3 therefore allows a sound, sustainable way forward for the VALP.