

Sustainability Appraisal (SA) of the emerging Local Plan for Buckinghamshire

Interim SA Report

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Quality information

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Non-technical summary

Buckinghamshire Council is consulting on an early draft of the Local Plan for Buckinghamshire which, once adopted, will set a strategy for growth and change up to 2045, allocate sites to deliver the strategy and establish policies against which planning applications will be determined.

Importantly, the current Draft Local Plan that is published for consultation does not present site allocations, but it does present a draft spatial strategy as a high level 'direction of travel'.

This Interim Sustainability Appraisal (SA) Report is published alongside, with a view to informing the consultation and subsequent plan finalisation, i.e. preparation of the final draft ('proposed submission') version of the Local Plan. The Interim SA Report is presented in three parts:

- **Part 1** – explains work to explore **reasonable alternatives (RAs)**. Specifically, work is explained to define RAs (Section 5), appraise RAs (Section 6) and then feed-back to the Council to inform a decision on the preferred approach for consultation (Section 7).
- **Part 2** – appraises **the Draft Local Plan** that is currently published for consultation. It is important to reiterate that key aspects of the plan are a work in progress at the current time, such that what is published for consultation can be described as a 'direction of travel'.
- **Part 3** – explains **next steps**, i.e. work to prepare the Proposed Submission Local Plan (in light of the current consultation) and then submit the Local Plan for an Examination in Public.

Part 1 comprises the bulk of the Interim SA Report. Specifically, it describes work to explore reasonable alternatives in respect of: A) growth quantum; and B) broad spatial strategy.

With regards to (A), the main report presents a high-level discussion of three alternatives: Option 1) set the housing requirement a level below local housing need (LHN) such that the Local Plan generates unmet need; Option 2) set the housing requirement at LHN; and Option 3) set the housing requirement at a level above LHN potentially with a view to providing for unmet need from elsewhere. The appraisal finds that there is limited case to be made for either Option 1 or Option 3, which aligns with the typical situation nationally, recognising that a housing requirement set at LHN is essentially the national default approach. In particular, there is limited strategic case to be made for a Option 1 (lower growth) although it is important to reiterate that the appraisal is high level, i.e. undertaken with minimal assumptions regarding spatial strategy and site allocations. Once these are factored in it could be that the case for lower growth increases.

With regards to (B), this is the primary focus of work at this stage in the plan-making / SA process, although it is important to say that the appraisal is nonetheless high level, recognising the early stage in the plan-making process. Specifically, the starting point is a 'direction of travel' spatial strategy, specifically in respect of housing supply, and then the alternatives appraised involve a shift in emphasis in respect of strategy. More specifically:

- Option 1 – is the **direction of travel** that is the focus of the current consultation. A quantum of housing growth is assigned to categories of settlement across Buckinghamshire and the combined effect is a total supply that might enable the housing requirement to be set at LHN. These settlement-category quanta figures are underpinned by work to date to explore site allocation options, but specific sites are not a focus of the current consultation, because work is at an early stage (rather, the intention is that detailed work to explore site options and, in turn, settlement options, will be undertaken subsequent to the current consultation).
- Option 2 – sees increased emphasis on Buckinghamshire's **main towns**. The assumption is that the increased emphasis would involve greenfield sites, but nothing further is assumed in terms of spatial approach, i.e. in terms of specific settlements or sites.
- Option 3 – sees increased emphasis on settlements that have been categorised as a **transport hub** and commensurately less growth elsewhere. Again, no further spatial specificity can be safely or helpfully assumed at this early stage in the process.
- Option 4 – sees increased emphasis on settlements that have been categorised as well linked to a **key employment area** and commensurately less growth elsewhere.

- Option 5 – sees increased emphasis on settlements at the **edge of Buckinghamshire** (for example, Milton Keynes and/or Slough) and commensurately less growth elsewhere.
- Option 6 – sees an increased emphasis on **other settlements** (including smaller villages, such that this would involve greater ‘dispersal’) and commensurately less growth elsewhere.
- Option 7 – would involve an increased emphasis on **new settlements**. The direction of travel (Option 1) assumes 12,000 homes but there is much uncertainty ahead of detailed work.

N.B. it is important to emphasise the high-level nature of these alternatives. Option 1 is high level because whilst growth quanta figures are assigned to settlement categories these are indicative ahead of further work. It is published for consultation with a view to sparking discussion and debate and supporting evidence gathering. Options 2 to 7 are then even more high level in that there are no assumptions made regarding what higher / lower growth for each settlement category would mean in practice, in terms of settlement and site options.

With regards to the appraisal of these seven broad spatial strategy alternatives, this is presented in Section 6.3 of the main report and is a key outcome of SA work at this stage in the process. It is inherently challenging to reach appraisal conclusions with any degree of confidence, given the high-level nature of the alternatives, but key messages to emerge include:

- Whilst the appraisal flags support for **Option 7** (New settlements) under a high proportion of the sustainability topics used as the basis for the appraisal (the ‘framework’; see Section 3), this reflects an assumption that more than 12,000 homes could be delivered in a timely manner within the plan period. In practice, new settlements are highly challenging to deliver, such that they are associated with long lead in times and delivery risk. There is a need to be realistic regarding supply that can be achieved from new settlements in the plan period including the crucially important earlier years.¹ In turn, there is a need to avoid over-reliance on new settlements within the housing delivery trajectory, as if one or more is delayed the effect could be that Buckinghamshire fails to deliver on its committed housing requirement leading to punitive measures (‘the presumption in favour of sustainable development’).
- **Option 6** (Other settlements) is shown to perform quite poorly in that it is appraised as the (joint) preferable option under just one SA topic. This reflects three key factors:
 - Growth would be relatively dispersed across settlements and delivered via smaller sites, as opposed to being concentrated at strategic sites and/or concentrated across sites at a given settlement or within a particular strategic sub-area (e.g. a transport corridor). This leads to a concern that opportunities would be missed to target growth-related investment aimed at delivering on strategic priorities, most notably in terms of new and enhanced infrastructure (including green / blue infrastructure recalling the national move to a more strategic approach to ‘nature recovery’ including via a new Strategic Nature Network).

However, on the other hand, ensuring that the Local Plan’s housing supply portfolio includes a good proportion of smaller and medium sized sites is very important from a perspective of ensuring a robust delivery trajectory, i.e. one that is suitably front loaded and associated with minimal delivery risk, as is ensuring a good geographical spread of sites (to minimise the risk that an element of local housing market saturation impacts delivery).

Also, it is important to recognise that many villages are associated with clear growth-related opportunities, in terms of: meeting housing needs (e.g. some villages have seen limited new housing over many years and decades, let alone affordable housing); delivering targeted infrastructure benefits (e.g. a school expansion, a village hall, a sports / recreation / play area or active travel infrastructure); and/or maintaining and perhaps even enhancing existing services (including bus services), facilities, retail and general village vitality.

¹ There will likely be a need to set the housing requirement at LHN from the outset of the plan period and then deliver on that requirement year on year, such that ensuring there are “deliverable” sites (NPPF para 72) able to deliver early in the plan period is of key importance (ahead of a Local Plan Review, which can then boost supply over latter years to 2045 as necessary). There can be the potential to argue for a ‘stepped’ requirement whereby the requirement is lower in the early years (e.g. below LHN) and then commensurately higher in the latter years (e.g. above LHN) which can then open the door to increased reliance on supply from new settlements. However, there is quite a high bar to justifying a stepped requirement, which essentially involves deferring meeting housing need. Specifically, there is a need to demonstrate that there are barriers to higher growth in the early years of the plan period and/or major opportunities to be realised through high growth late in the plan period.

- Higher growth at villages does naturally give rise to a concern regarding ability to access higher order services and facilities and reliance on the private car to do so. Whilst the ongoing national switch-over to electric vehicles does reduce concerns, there remains a need to minimise traffic in congestion hotspots and also along rural roads with limited capacity and through historic village centres. Whilst dispersed car trips can help to avoid congestion, there is a need to recognise that trips will concentrate at higher order centres.
- Villages can have limited potential to accept growth from a historic environment perspective and potentially a wider environmental perspective. However, it is difficult to make this case with any degree of certainty, because there is much variation across villages, accounting for factors including the landscape context (e.g. heavily wooded versus expansive vale), the built form (e.g. nucleated versus dispersed) and the extent to which there has been modern expansion beyond the historic core (with the London Green Belt a factor here).

It is important to add here that, moving forward, an important broad strategic question will be in respect of what scale of site allocation(s) and what scale of overall growth is appropriate for villages in the Chilterns National Landscape (NL). On the one hand, modest sized sites and modest overall growth might be seen as minimising the risk of impacts to the NL, including recognising that a new duty to “seek to further” the purposes of NLs came into effect in 2023 under the Levelling Up and Regeneration Act. However, on the other hand, there is a need to support the ‘right’ sized sites that are able to deliver maximum benefits (‘planning gain’) for any village, and some villages may be associated with a need for growth (as discussed). There is currently debate nationally regarding how to interpret paragraph 190 of the NPPF, which seeks to avoid “major” developments in NLs.

- **Option 5** (Edge of Bucks) is difficult to appraise, as issues and opportunities are specific to the settlements and neighbouring local authorities in question, i.e. there is no broad strategic case to be made for or against directing growth to the edge of Bucks (other than, perhaps, a case to be made against any such strategy because of the practical challenges of effective cross-border collaboration including in respect of infrastructure planning, also in terms of determining whether the housing would count towards Buckinghamshire’s housing need/requirement of that of the neighbouring local authority could prove challenging). Key considerations include:
 - Milton Keynes – there is a need to support growth aspirations accounting for the adopted (but non-statutory) MK 2050 Strategy and the emerging City Plan (Local Plan) 2050 and recognising that Milton Keynes is the largest local economy in the South of England and Wales outside of London. The MK 2050 strategy has a strong focus on directing growth in line with mass transit opportunities, and whilst the Draft City Plan published in 2024 did not make any reference to cross-border opportunities, this is an important matter for ongoing consideration. The main focus of growth within the Draft City Plan (2024) is to the east of Milton Keynes, i.e. land that is distant from Buckinghamshire, but the plan did also propose the allocation of two strategic sites on the edge of Buckinghamshire, plus there are two allocated/committed strategic sites within Buckinghamshire on the edge of Milton Keynes. There are sensitivities to growth within Buckinghamshire around the MK edge – notably the Greensand Ridge, Whaddon Chase, the River Ouzel / Grand Union Canal corridor and sensitive villages including Whaddon, and there is a concern regarding unchecked ‘sprawl’. A focus of growth within Buckinghamshire at Winslow, which is set to become very well-linked to MK by East West Rail – could reduce the case for further growth within Buckinghamshire at the MK edge, as could a possible new settlement close to MK.
 - Slough – also forms part of a nationally significant corridor of economic activity plus the town experiences significant issues of relative deprivation and there is a clear challenge in respect of delivering on local housing needs given very few greenfield supply options within the Borough. The current Slough Local Plan was adopted in 2008 and looks only to 2026 (in the context of the NPPF requiring local plans to be reviewed every five years and look ahead 15 years) and there has been no consultation on a new Local Plan since 2021. Land within Buckinghamshire at and close to the edge of Slough is associated with a complex set of constraints, but there is a clear growth opportunity, both given Slough-specific issues and because this is a part of Buckinghamshire where growth could align with accessibility/transport and economy/employment objectives. However, it could be a case of supporting a series of relatively modest-sized site allocations rather than one or two strategic allocations, which could lead to additional challenges in respect of collaboration.

- Brackley – is associated with less of a strategic growth opportunity, but there is potentially an opportunity nonetheless recognising the proximity of Silverstone, which is a strategic employment area (Buckingham is a similar distance, but less well connected). West Northamptonshire Council published a Draft Local Plan in 2024 that proposed quite modest growth for Brackley (one site for 350 homes), but the town has seen significant northwards expansion over recent years and decades. The possibility of strategic expansion into Buckinghamshire is a very distinct option that warrants testing relative to other options for the strategic expansion of Brackley (which likely means further northward expansion). Specifically, land within Buckinghamshire benefits from good links to the town centre (also Brackley's main employment area and the A43 to Silverstone) but expansion here would involve expansion beyond the A43 dual carriageway that currently bounds the eastern edge of the town (also the employment area), plus there is constraint associated with the valley of the River Great Ouse. On the other hand, HS2 passes to the east of Brackley, leading to an opportunity for growth within Buckinghamshire between the railway line and the town, and another consideration is potentially river corridor enhancement, e.g., a country park.
- Other settlements on the edge of Bucks – are associated with much less in the way of strategic choice. In the south of Buckinghamshire attention focuses on the expansion of Slough (and the linked settlements of Burnham and Langley; less so Farnham Royal and not Farnham Common, given Burnham Beeches SAC as a key constraint) with very limited if any potential for expansion of Uxbridge or Maidenhead given the River Thames and River Colne corridors (although there may be some growth opportunity at New Denham, which shares a Green Belt inset boundary with Uxbridge). The other settlements of note are then Leighton Buzzard and Tring, but there is likely little in the way of growth opportunity (at Tring expansion to the north is an option, but not the favoured option in the recently submitted Dacorum Local Plan and, in any case, land within this sector that falls within Buckinghamshire also falls within the National Landscape). Finally, there is the important question of growth in the vicinity of the Ivers in the south of Buckinghamshire, recognising that the villages here relate very closely to both Slough and Uxbridge.
- The other options are then **Option 1** (Direction of travel), **Option 2** (Main towns), **Option 3** (Transport hubs) and **Option 4** (Employment areas). It is difficult to meaningfully draw high level conclusions on the merits of Option 1 versus an alternative approach involving an added emphasis on main towns, transport hubs or settlements linked to key employment area, but specific areas that *could potentially* see higher/lower growth are discussed in the main report.

One broad strategic point that can be noted here is that support for either Option 2 or Option 3 could mean an added emphasis on the south of Buckinghamshire within former Chiltern and South Bucks Districts, which would represent a significant strategic intervention recognising that these former districts last adopted Local plans in 2011 (and these were high level 'Core Strategies'). These are areas where there is a longstanding need for a strategic approach to growth that recognises wide-ranging constraints/issues, including relating to the National Landscape and Green Belt, but also opportunities. Ongoing work to define grey belt (a new policy designation introduced in December 2024) must also factor in.

Part 1 of the main report concludes with Section 7, which presents a statement from officers in response to the two alternatives appraisals (growth quanta and broad spatial strategy). A key message is that whilst the direction of travel strategy/supply that is currently published for consultation (which would likely enable the housing requirement to be set at LHN) is justified in light of the appraisal work that has been completed to date,² there is a need for much further work subsequent to the current consultation to explore site, settlement and broad strategy options.

Specifically, further work will be undertaken through: the Housing and Economic Land Availability Assessment (HELAA); Green Belt Assessment (GBA); a New and Expanded Settlement Study (NESS); and Sustainability Appraisal (SA, including work focused on specific settlements). Also, there are various evidence gathering workstreams that will need to feed-in, for example in respect of transport and wider infrastructure planning, and another factor is that the Government's New Towns Taskforce is due to report this year on a shortlist of 10,000+ home New Towns.

² NPPF paragraph 37 sets out that to be justified a plan must be "an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence."

Part 2 of the main report then aims to present an appraisal of the current Draft Local Plan as a whole, albeit recalling that the spatial strategy at the heart of the plan is only a 'direction of travel'.

In practice, Part 2 is an opportunity to: A) recap messages in respect of Option 1 from the preceding alternatives appraisal section; B) comment on the direction of travel in respect of employment and providing for Gypsy, Traveller and Travelling Showpeople accommodation needs, which are two further matters that are a focus of the current consultation; and C) comment on the development management (DM) policies that are also published for consultation.

With regards to (A), the key point to note is that under most sustainability topic headings the appraisal concludes a 'neutral' effect at the current time including accounting for the difficulty of drawing conclusions given the high-level nature of the direction of travel supply/strategy.

Under three topic headings there is quite strong support ('moderate or uncertain positive effects') for the Draft Plan, namely: 1) 'Accessibility', reflecting an emerging focus on strategic growth locations; 2) 'Economy and employment', reflecting an emerging focus on directing a good proportion of strategic housing growth to the south of Buckinghamshire; and 3) 'Housing' including because a commitment to providing for LHN in full if possible.

However, under three headings concerns are raised ('moderate or uncertain negative effects'), namely: 1) 'Climate change mitigation', recognising that this is a priority issue such that all reasonable steps must be taken through spatial strategy / site selection including in respect of maximising the potential to deliver net zero developments; 2) 'Historic environment', in recognition of the fact that deciding site allocations across a very large number of sensitive villages (also towns) whilst avoiding/minimising constraints will be a major undertaking (e.g. Historic England often request site-specific Historic Impact Assessments); and 3) 'Landscape' including recognising a likely new strategic focus on the South of Buckinghamshire.

With regards to (B), the emerging commitments in respect of employment land are considered very proactive, in that there is a recognition of the following: 1) whilst employment land needs are established on the basis of a preferred economic forecast, economic forecasting is inherently uncertain and forecasts suggesting higher need must also be given due consideration; 2) there are a range of larger-than-local needs that *could potentially* be provided for within Buckinghamshire with a view to supporting the regional and national economy (notably datacentres and warehousing/distribution); and C) there is a need for a good mix of sites / supply, including geographically, and this suggests a need to protect most existing employment sites.

Moving on to Gypsy and Traveller accommodation needs, these are very significant, and it is crucially important to tackle this issue head on, recognising that identifying new supply is inevitably highly challenging, and given the issues faced by Gypsy and Traveller communities. This matter is discussed in further detail in the main report.

Finally, with regards to (C) (DM policies), the appraisal at this stage is 'light touch' recognising that there will be a need to revisit policies to ensure they reflect the preferred spatial strategy / sites / supply subsequent to the current consultation. Also, there will likely be a need to account for forthcoming National Development Management Policies (NDMPs), which the Government has committed to publishing for consultation in 2025. Moving forward, it will be important to:

- Recognise the links between spatial strategy / site selection and what can be required of developers within the parameters of development viability and, in turn, seek to realise policy objectives through spatial strategy / site selection as far as possible, as opposed to overly relying on DM policy requirements that risk not being fully implemented (given that DM policy requirements are weighed in the balance at the planning application stage in the context of any demonstrable viability constraints). For example, if the desire is to both deliver affordable housing at a high rate (to include a high proportion of social housing) and deliver net zero developments, then it will be important to direct growth to sites with strong viability credentials.
- Set out clear site-specific policy requirements, such that site promoters / developers have ample opportunity to confirm what can be achieved given any known viability constraints prior to plan finalisation and, in turn, the plan can be finalised with confidence regarding what will be achieved in practice (albeit also recognising that viability challenges are dynamic).

Part 3 is then the final part of the report, and primarily involves a short discussion of next steps:

Post consultation all responses will be reviewed and factored in, and further evidence-gathering will be undertaken as necessary. This will then feed into work to define and appraise reasonable alternative 'growth scenarios', essentially in the form of alternative key diagrams. The process of defining growth scenarios will account for a wide range of broad strategic (top down) and local area / site-specific ('bottom up') issues and opportunities.

Work to appraise growth scenarios will inform preparation of the final draft ('proposed submission') version of the Local Plan, which will then be published under Regulation 19 of the Local Planning Regulations. The formally required SA Report will be prepared for publication alongside, essentially tasked with presenting an appraisal of "the plan and reasonable alternatives" (the central requirement; see Regulation 12(2) of the SEA Regulations).

Once the period for representations on the Local Plan / SA Report has finished the intention is to submit the plan for Examination in Public (EiP) alongside a summary of the main issues raised through the Regulation 19 publication period. At EiP one or more Government-appointed Inspectors will consider representations before identifying modifications necessary for soundness. Modifications will then be prepared and subjected to consultation (with an SA Report Addendum published alongside if necessary).

Once found to be 'sound' the Local Plan will be adopted. At the time of adoption, a 'Statement' will be published setting out information including "measures decided concerning monitoring".

1. Introduction

1.1. Background

- 1.1.1. AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the Local Plan for Buckinghamshire that is being prepared by Buckinghamshire Council.
- 1.1.2. Plan-making is currently at an early stage, but once the Local Plan is adopted it will set a strategy for growth and change up to 2045, allocate sites to deliver the strategy and establish policies against which planning applications will be determined.
- 1.1.3. SA is a mechanism for considering and communicating the effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. SA is required for local plans.³

1.2. SA explained

- 1.2.1. It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes (SEA) Regulations 2004.
- 1.2.2. In-line with the Regulations, a report (known as the **SA Report**) must be published for consultation alongside the draft plan that presents an appraisal of “the plan and reasonable alternatives” with a particular focus on appraising “significant effects”.
- 1.2.3. More specifically, the SA Report must:
 - explain **work to date** and, in particular, appraisal of ‘reasonable alternatives’;
 - present **an appraisal of current proposals**, i.e. the Draft Plan; and
 - explain next steps.
- 1.2.4. The report must then be taken into account, alongside consultation responses, when finalising the plan.

1.3. This Interim SA Report

- 1.3.1. The current consultation is on an early draft plan under Regulation 18 of the Local Planning Regulations, with the intention to subsequently consult on the final draft (‘proposed submission’) version under Regulation 19.
- 1.3.2. As such, this is not the formal SA Report but an ‘Interim’ SA (ISA) Report.
- 1.3.3. It is important to be clear that the current ‘draft plan’ consultation is limited in scope and that the scope of the consultation is reflected in the scope of SA work reported below.

Structure of this report

- 1.3.4. In line with the three bullet points above, this ISA Report is structured in **three parts** covering “work to date”, “an appraisal of the current proposals” and “next steps”.
- 1.3.5. Ahead of Part 1, there is a need for two further introductory sections:
 - Section 2 – introduces the plan scope.
 - Section 3 – introduces the SA scope.

³ Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2024). The Town and Country Planning (Local Planning) Regulations 2012 require that an SA Report is published for consultation alongside the ‘Proposed Submission’ plan document.

2. The plan scope

2.1. Introduction

- 2.1.1. The aim here is to briefly introduce the context to plan preparation, including the national context of planning reform; the plan area (ahead of more detailed discussion below); the plan period; and the objectives that are in place to guide plan preparation.

2.2. Context to plan preparation

- 2.2.1. There is an urgent need to adopt a Local Plan for Buckinghamshire because the National Planning Policy Framework (NPPF) expects all local and unitary authorities (Buckinghamshire is a unitary) to have an up-to-date local plan that looks ahead 15 years, including in terms of identifying a supply of land sufficient to meet development needs. The NPPF sets out that local plans must then be reviewed every five years.
- 2.2.2. There is also considerable urgency to adopt a new Local Plan with a view to ensuring that the Council is able to demonstrate and maintain a five year housing land supply (5YHLS), i.e. a rolling supply of demonstrably 'deliverable' sites with a total capacity sufficient to provide for the annual housing requirement (discussed below) over a total of five years. An inability to demonstrate a 5YHLS means that planning applications must be determined under the 'presumption in favour of sustainable development' (NPPF paragraph 11) and this has been across Buckinghamshire over recent years. Specifically, the issue is that 'the presumption' means a 'tilted balance' in favour of granting planning permission, such that where the Council refuses an application there is a heightened risk of the application being permitted at appeal ('planning by appeal').⁴
- 2.2.3. There is a need for a major supply boost in order to reach a situation whereby the Council is able to demonstrate and maintain a 5YHLS and, clearly, the best way to achieve this is in a coordinated way via a Local Plan, as opposed to approving ad hoc (or 'speculative') applications for new development in the absence of a plan.
- 2.2.4. To summarise, there is both A) 'top down' pressure to adopt a Local Plan given the expectations of the Government, as set out in the NPPF; and B) 'bottom up' pressure in the sense of a need to ensure that growth comes forward in a plan-led way, i.e. such that Buckinghamshire can avoid potentially problematic 'planning by appeal'.
- 2.2.5. Finally, and on a more positive note, there is a need to adopt a Local Plan that delivers on wide-ranging objectives regardless of the 'pressures' discussed above, for example:
- Providing for housing need is not only of great importance in-and-of itself, but also due to wide-ranging secondary benefits, e.g. affordable housing and the economy.
 - A local plan is about 'place-shaping', so responding to settlement-specific issues and opportunities, and creating high quality new communities, including new settlements.
 - Plan-led housing growth creates an opportunity to target infrastructure investment to realise benefits far in excess of what would otherwise be the case. This is for all types of infrastructure including green infrastructure, including to deliver nature recovery.
 - Coordinated growth can also deliver on regeneration objectives for town centres and underused commercial land, although caution must be applied in terms of committing to new supply from regeneration, because of the inherent complexities involved.
 - A local plan is an opportunity to consider development viability in a strategic way, such that a considered approach can be taken to policy 'asks' including housing mix, affordable housing, net zero development, biodiversity net gain and more.
 - The Local Plan is a key opportunity to ensure a strategic approach in respect of a range of other key issues, including providing for employment land needs.

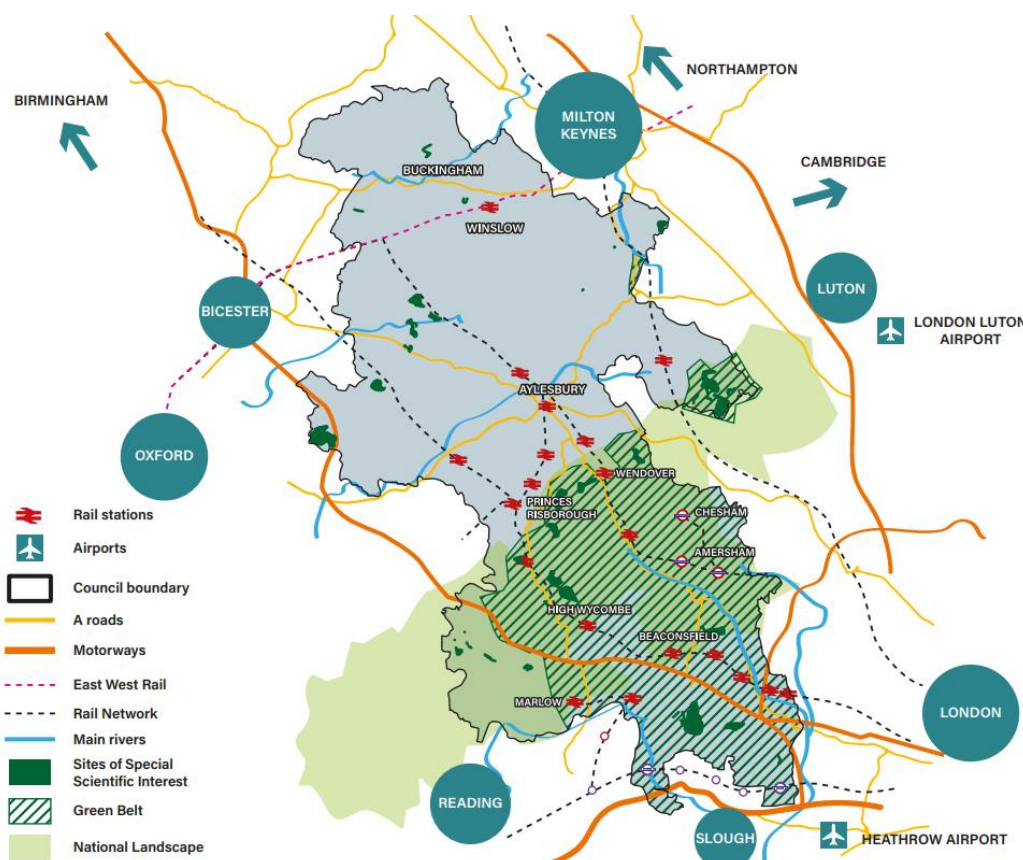
⁴ There is also a need to annually pass the Government's Housing Delivery Test (HDT), which is a test of whether the housing requirement has been delivered over the three most recent years. Essentially there is a need for a robust supply, as measured against the requirement, sufficient to pass both the HDT, which looks back, and the 5YHLS test, which looks forward.

2.3. The plan area

- 2.3.1. On 1 April 2020, the former District Council areas of Aylesbury Vale, Chiltern, South Bucks and Wycombe came together with Buckinghamshire County Council to form a single Unitary Authority, Buckinghamshire Council. The ceremonial county of Buckinghamshire also includes Milton Keynes City Council, but here references to the 'County' of Buckinghamshire relate to the area covered by Buckinghamshire Council.
- 2.3.2. Buckinghamshire comprises a key sector of land in the national context, stretching from the northwest edge of London, the River Thames and the M25/M4 in the south, via the M40 corridor and the Chilterns to the Vale of Aylesbury and then Milton Keynes in the far north. The diversity of the County from north to south is a key characteristic feature.
- 2.3.3. Beginning with the southeast extent Buckinghamshire, this area is associated with the edge of London, the River Colne / Grand Union Canal corridor (including the River Colne Regional Park) and the M25 / M40 / A40 junction. There is excellent rail connectivity from Gerrards Cross, Denham and Langley and employment at Pinewood, and another factor is the influence of HS2 including the Colne Valley Viaduct.
- 2.3.4. Just to the south of Buckinghamshire is then the M4 corridor including Slough and Maidenhead, with this a key economic growth area noting the proximity of Heathrow. Slough is a tightly bounded urban authority with high development needs, which is an important consideration for the Buckinghamshire Local Plan (in the context of the Duty to Cooperate; NPPF para 24) but there are also extensive constraints to growth in this area, particularly relating to very extensive ancient woodland (including internationally important Burnham Beeches SAC) and historic environment designations (including several Registered Parks and Gardens, including two that are Grade 1 listed).
- 2.3.5. To the west is then Marlow, which is an attractive and historic market town associated with a characteristic position between the River Thames and the Chilterns National Landscape. Marlow is associated with the A404 which links the M4 and M40 corridors.
- 2.3.6. Moving to the north is then the Chilterns National Landscape, which is cut through by the M40 corridor and a series of towns and large villages well-linked to London by road and rail, including towns that grew in the 20th Century as part of Metroland. High Wycombe is at the heart of this area, slightly more distant from London and strongly associated with the Chilterns. To the west, north and northeast of High Wycombe is then the high Chilterns including the iconic Chilterns escarpment and the associated small towns of Princes Risborough and Wendover, also Tring nearby in Hertfordshire.
- 2.3.7. The northern half of Buckinghamshire is then primarily associated with the Vale of Aylesbury, stretching between the Chilterns escarpment in the south – where the setting of the Chilterns is a major constraint – to the Greensand Ridge and the edge of Milton Keynes in the north. Aylesbury is located at the south of this area and is Buckinghamshire's main town having accounted for recent, ongoing, committed and future strategic growth town. Much of the wider Vale is rural and poorly connected in transport terms, but Haddenham is a large village with a train station and other areas are well linked by road, including to Milton Keynes and Oxford. Finally, it is important to note the valued Mid Vale Ridge and associated villages in the central part of this area.
- 2.3.8. Finally, in the far north the edge of Milton Keynes is nationally significant as a potential growth area and, similarly, the village of Winslow must be considered for strategic growth given a new train station on East West Rail (EWR). Similarly, Buckingham is a key growth location given links to Milton Keynes, Oxford and Silverstone on the Northamptonshire border, but is a sensitive historic town without rail connectivity.
- 2.3.9. The population of Buckinghamshire was 553,078 people in 2021 according to census data, with the population having grown by 9.5% since in 2011, which is a rate of growth above the average of 6.6% for England over this period. The population growth of Aylesbury was notably 10.4% over this period and the town continues to grow.

- 2.3.10. Buckinghamshire has an ageing population with an increase of 23.2% in people aged 65 years and over between the 2011 and 2021 census. This compares to an increase of 6.4% in people aged 15 to 64 years and an increase of 7.9% in children under 15 years.
- 2.3.11. Buckinghamshire is overall an affluent area as measured by the Index of Multiple Deprivation; ranking 7th least deprived out of 151 local authorities nationally. However, there are significant inequalities in levels of deprivation within the County, with a difference in life expectancy of 5.4 years between the most and least deprived areas. For more information see the Joint Strategic Needs Assessment available [here](#).
- 2.3.12. There are significant housing needs and delivering housing to meet these needs can bring with it investment in support of wider objectives. There is also an opportunity for the local plan to support targeted jobs creation and economic growth in support of local, sub-regional and national objectives, and this is a key matter explored further below.
- 2.3.13. In terms of constraints to growth, these are wide ranging but equally there are extensive parts of Buckinghamshire that are relatively unconstrained when viewed in the sub-regional and regional context, notwithstanding transport and accessibility challenges.
- 2.3.14. The Chilterns National Landscape (NL) stands-out as the most significant constraint to growth, covering 27% of the County not accounting for further land constrained by the NL setting, which most notably means land towards the south of the Vale of Aylesbury. The London Metropolitan Green Belt then covers 32% of Buckinghamshire, with most of this area also covered by the Chilterns NL (there is a small area of Green Belt outside of the NL, namely land directly north of Wendover). Green Belt is an important constraint to development although it is important to acknowledge the evolving national policy context, including introduction of grey belt as a new designation, essentially a sub-category of Green Belt. Work to identify grey belt is underway.

Figure 2.1: Overview of Buckinghamshire



2.4. The plan period

- 2.4.1. The plan period is 2024 to 2045, in light of NPPF paragraph 22 which states:
- “Local plans] should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities. Where larger scale developments such as new settlements or significant extensions... form part of the strategy for the area, policies should be set within a vision that looks further ahead...”*
- 2.4.2. With regards to the start of the plan period ('base date'), it is increasingly seen as good practice for the plan base date set as close as possible to the date of plan adoption, recognising that the Government's 'standard method' for calculating housing need is updated annually and includes an upwards adjustment for affordability such that any recent under-supply is captured (assuming supply affects affordability).⁵
- 2.4.3. With regards to the plan end date, 2045 represents good practice in light of NPPF paragraph 22. Longer plan-periods support a vision-led approach, including with consideration given to long term economic growth and infrastructure strategy, potentially across a sub-region. However, on the other hand, there is a need to consider the national devolution agenda, under which sub-regional Spatial Development Strategies (SDSs) are forthcoming and will look to steer growth with a long-term perspective.

Completions and commitments

- 2.4.4. It is worth noting here that, as of the start of the plan period (1st April 2024) ~22,000 homes are set to come forward at sites with planning permission or an existing allocation that can be confidently rolled forward into the new Local Plan (albeit existing allocations without planning permission do remain subject to adjustment).
- 2.4.5. In turn, a key aim for the Local Plan is to identify a supply of land to provide for development needs (as far as possible, as discussed below) over-and-above these 'commitments' and this is primarily achieved by the 'allocation' of sites and broad locations for development, in line with NPPF paragraph 72.
- 2.4.6. A clear goal is providing for development needs over the plan period as a whole and, in the case of housing, this means providing for Local Housing Need (LHN) as understood from the Government's standard method. Standard method LHN for Buckinghamshire is 4,332 dwellings per annum (dpa), or ~91,000 homes in total. This suggests a need for the Local Plan to identify supply for 69,000 homes (91,000 minus 22,000).
- 2.4.7. However, in practice there is also a need to identify additional 'headroom' supply with a view to robust supply position accounting for the risk of delivery issues, which are inevitable, e.g. allowing for flexibility to respond to issues at the planning application stage. As discussed above, this is specifically with a view to ensuring that the Council can maintain a rolling 5YHLS and pass the annual housing delivery test (HDT) and so avoid the presumption in favour of sustainable development. Assuming 5% headroom, then the target becomes ~96,000 homes and the residual target 74,000 homes.
- 2.4.8. Another consideration is then the timing of supply, with the ideal situation being one whereby development needs are not only met over the plan period as a whole, but also year on year across the plan period. In this regard it is important to recognise that 'commitments' will deliver early in the plan period, such that the role for Local Plan allocations over earlier years might primarily be to 'top up' supply from commitments.
- 2.4.9. A final consideration is then NPPF paragraph 72, which establishes that for the latter years of the plan period there is a need to identify supply only "where possible".⁶

⁵ In practice, delivery averaged 2,907 homes per annum over the period 2021/22 to 2023/24.

⁶ To be clear, assuming that the housing requirement is set at 91,000 homes in line with standard method LHN then there would be a need to identify a total supply equivalent to this figure, otherwise the effect would be to generate 'unmet need'. However, there is flexibility in respect of identifying supply for the latter years of the plan period ("where possible"). In turn, this means that there is scope to 'front load' supply, such that supply significantly exceeds the housing requirement in the early years of the plan period (i.e. such that there is a healthy supply 'headroom' as a contingency for delivery issues) and then fall below the requirement over the later years, in the knowledge that supply for these years can be boosted through a local plan review.

2.5. Plan objectives

2.5.1. Plan objectives guide the plan-making process and are also a key input to the SA process, because ‘reasonable alternatives’ must be defined taking account of “*the objectives... of the plan.*” The plan objectives are as follows (abridged):

- **Planning for the natural and built environment** – conserve and enhance Buckinghamshire’s valued natural, historic, and built environments, to ensure they are protected from inappropriate development.
 - Sustain the predominantly rural character of Buckinghamshire.
 - Protect valued landscapes, including the Chilterns National Landscape, and open countryside in the Green Belt from harmful or inappropriate development.
 - Conserve and enhance special places for nature and create an enhanced connected county-wide network of green and blue infrastructure which maximises opportunities for biodiversity net gain through the creation of new priority habitats.
 - Improve quality of rivers and watercourses, including globally rare chalk streams.
 - Ensure that development respects historic assets including their setting.
 - Support regeneration of the built environment.
 - Seek to minimise waste and encourage the efficient use of resources and recycling.
- **Planning for mitigating and adapting to climate change** – ensure the delivery of sustainable development, mitigating climate change and adapting to the impacts on Buckinghamshire’s environment.
 - Support the transition to a net zero carbon Buckinghamshire by 2050.
 - Direct growth to the most sustainable locations in transport terms.
 - Manage flood risk and design new development to be resilient to climate extremes.
 - Increase the supply of renewable energy and provide supporting infrastructure such as electric vehicle charging points and hydrogen fuelling.
 - Require the highest standards of insulation, water, and energy efficiency.
 - Create locally liveable new neighbourhoods and regenerated areas.
 - Provide attractive and viable options for walking, wheeling and public transport.
- **Planning for new housing** – meet housing needs for all of the different groups in the community, including affordable housing, and provide increased tenure choice throughout Buckinghamshire, prioritising the efficient use of land.
 - Provide a range of housing to meet local needs for market, affordable, accessible and specialist needs (including ‘Lifetime homes’) while recognising the diversity in the character and context of our urban, suburban and rural areas.
 - Enable the delivery of homes for key workers, people with local connections, and those seeking self- and custom-build opportunities.
 - Ensure new housing is of high-quality design, low-carbon and digitally enabled and in keeping with its surroundings
- **Planning for quality of Place** – create great places to live and work that function well, and are welcoming, safe, and accessible to all.
 - Take inspiration from the valued and unique characteristics of Buckinghamshire to deliver high quality design that reinforces Buckinghamshire’s distinctiveness, while being innovative in construction and design where appropriate.
 - Create neighbourhoods where goods and services are available locally, are supportive of healthy lifestyles and social connectedness, easy to move through and easy to understand.
 - Provide sufficient and well-integrated parking.
 - Ensure development is built to high standards of sustainability, energy efficiency and design that promotes natural surveillance to improve safety.

- Secure a safe, accessible, inclusive, and robust network of spaces across Buckinghamshire for recreation, play, biodiversity, and water infrastructure
- Create safe and vibrant public spaces in towns and villages.
- **Planning for Infrastructure** – ensure the right infrastructure required to support communities is provided in the right place and at the right time, and make best use of existing infrastructure.
 - Facilitate wider connectivity across Buckinghamshire and beyond.
 - Ensure improved local connections within and between settlements.
 - Provide and protect appropriate social infrastructure including for health, education, skills training, sports, recreation and other community facilities.
 - Provide and connect green and blue infrastructure to enhance the landscape and biodiversity.
 - Provide flood risk mitigation and sustainable drainage solutions, negotiating with utility companies for adequate sewerage and wastewater infrastructure.
 - Encourage adequate provision of gas, electricity, water and other utilities.
- **Planning for new jobs** – grow and diversify the economy by delivering the right employment opportunities in the right places, supporting economic growth, productivity, regenerating towns, and villages, and enabling delivery of education, training and skills to enhance the employability of Buckinghamshire residents.
 - Enhance Buckinghamshire’s economic assets by supporting Enterprise Zones, strategic and key employment areas.
 - Support and enhance Buckinghamshire’s specialisms and strengths in high performance technology, space, film and high-end television, life sciences and medical tech sectors, including through appropriate skills and education provision.
 - Designate employment spaces that support a diverse range of commercial activity, from high quality offices to local workshops.
 - Seek opportunities to link residential and commercial development.
 - Locate new employment spaces close to good transport connections to ensure residents have access to viable public transport options.
 - Support the repurposing and regeneration of town centres and villages for a diverse range of uses.
 - Support a sustainable rural economy including sustainable agriculture and farm diversification, and safeguard food security.
- **Planning for Transport, Physical and Digital Connectivity** – improve connectivity across and between Buckinghamshire towns and villages with regional and national centres beyond, working in partnership across boundaries, by securing new sustainable transport infrastructure, upgrading existing infrastructure and improving digital connectivity.
 - Maximise the connectivity opportunities presented by large scale strategic transport schemes to focus the location of growth and encourage inward investment.
 - Create safe and attractive walking, wheeling and cycling routes as the natural choices for shorter journeys, or as part of a longer journey, for those who are able.
 - Diversify, extend, and enhance public transport provision, including bus services and preparing for new types of transport to enable... car-free journeys.
 - Create safe and accessible interchanges to and from public transport for walking, cycling and wheeling.
 - Facilitate effective transport solutions for all users.
 - Direct freight to the most appropriate routes and plan for sustainable freight activity and first mile / last mile solutions, in accordance with the Local Transport Plan.
 - Support the provision of digital infrastructure, particularly in more remote areas.
 - Deliver low or zero carbon fuel infrastructure.

3. The SA scope

Introduction

- 3.1.1. The scope of the SA refers to the breadth of sustainability issues and objectives that are taken into account as part of the appraisal of reasonable alternatives and the emerging plan. It does not refer to the scope of the plan (discussed above) nor the scope of reasonable alternatives (discussed in Part 1).
- 3.1.2. The aim here is to introduce the reader to the *broad scope* of the SA. Further information is presented in a stand-alone Scoping Report (2023); however, it is important for the SA scope to remain flexible, responding to the emerging plan and reasonable alternatives, and the latest evidence-base.

Consultation on the scope

- 3.1.3. The statutory consultation bodies and neighbouring local authorities were consulted on the Scoping Report in 2023 and all responses received have been taken into account. Comments on the SA scope are welcome at the current time.

The SA framework

- 3.1.4. The key outcome of scoping work is the SA ‘framework’ under which subsequent appraisal can be undertaken, with a view to ensuring that appraisal is suitably focused. At the core of the framework is a list of sustainability objectives under topic headings.
- 3.1.5. The SA framework is discussed further below, but at its core are the following topics:
- Accessibility
 - Air quality
 - Biodiversity
 - Communities
 - Climate change adaptation
 - Climate change mitigation
 - Communities, and health
 - Economy & employment
 - Historic environment
 - Housing
 - Landscape
 - Resources
 - Transport
 - Water
- 3.1.6. Appendix II presents the SA framework in full, specifically the objectives defined for each of the above topics at the scoping stage in 2023. N.B. these objectives have not been updated since 2023, but it is recognised that they will need a refresh subsequent to the current consultation, and there is also scope to adjust the list of topic headings (e.g. adding one or more topics, although keeping the SA framework concise is important).

Part 1: Work to date

4. Introduction to Part 1

Overview

- 4.1.1. A range of work-streams have been ongoing over recent years, including informal consultation and engagement. However, the aim here is not to relay the entire backstory, nor to provide an ‘audit trail’ of steps taken.
- 4.1.2. Rather, the aim is to report work undertaken to examine **reasonable alternatives** in 2025 ahead of the current consultation. Specifically, the aim is to:
- explain the reasons for selecting the alternatives dealt with – see **Section 5**
 - present an appraisal of the reasonable alternatives – see **Section 6**
 - explain the Council’s reasons for selecting the preferred option – see **Section 7**
- 4.1.3. Presenting this information aligns with the requirement to report an appraisal of reasonable alternatives and “*an outline of the reasons for selecting the alternatives*”.

Reasonable alternatives in relation to what?

- 4.1.4. The requirement is to examine reasonable alternatives (RAs) taking account of “*the objectives and geographical scope of the plan*”, which suggests a need to focus on the **spatial strategy**, i.e. providing for a supply of land, including by **allocating sites**, to provide for objectively assessed needs alongside delivering-on wider plan objectives. Establishing a spatial strategy is clearly a central objective of the Local Plan.⁷
- 4.1.5. Spatial strategy alternatives can perhaps more accurately be described as **alternative key diagrams**, where the key diagram is a reflection of established development requirements, spatial strategy and site selection / approach to supply.
- 4.1.6. Alternative key diagrams can then be termed ‘**growth scenarios**’ as a shorthand. The aim of appraising and consulting on growth scenarios is to provide consultees with a clear mutually exclusive choice in respect of the matter at the very heart of the plan.⁸
- 4.1.7. **However**, RA growth scenarios can only be developed once work has been completed to explore the merits of competing site allocation options (bottom-up factors) alongside work to explore various strategic issues and options (top-down factors).
- 4.1.8. The Buckinghamshire Local Plan is not yet at this stage, as discussed below.
- 4.1.9. In turn, a reasonable focus of work to explore RAs at this stage is on the matter of strategic issues and options, i.e. **top-down factors**.
- 4.1.10. The aim is both to inform the current consultation and, in turn, to build an evidence base that will feed into work to explore growth scenarios subsequent to the consultation.⁹

⁷ Another consideration is that to be ‘reasonable’ alternatives must be meaningfully different to the extent that they vary in terms of **significant effects**, where significance is defined in the context of the plan (taken as a whole). A focus on key diagram RAs (‘growth scenarios’) guarantees that this will be the case and so negates the need for a process of screening what should and should not then be a focus of subsequent work to explore (i.e. define, appraise and consult upon) RAs. It is also important to note that appraising a draft proposal versus the ‘do nothing’ option does not equate to an appraisal of RAs, because do nothing is the baseline and there is a separate requirement, as part of the SA process, to appraise the draft plan against the baseline.

⁸ Whilst **individual site options** clearly generate interest, they are not RAs in the context of most local plans. Were the objective to allocate one site, then site options would be RAs, but that is rarely the case for local plans. Rather, the objective is to allocate a package of sites and so RAs must be in the form of alternative packages of sites, in so far as possible. Nonetheless, consideration is naturally given to the merits of site options as part of the process of defining RA growth scenarios.

⁹ Another focus of the current consultation is **development management (DM) policy**. However, it is a challenge to define “reasonable” DM policy alternatives, and, in this case, none are identified following discussion with Officers. DM policies are discussed further in Part 2 and, as part of this, informal consideration is given to the question of RAs.

5. Defining reasonable alternatives

5.1. Introduction

- 5.1.1. As discussed in Section 4, whilst it is good practice to define RAs in the form of ‘growth scenarios’ comprising alternative combinations of site allocations, it is not possible to define growth scenarios of this nature at the current stage. Box 5.1 elaborates further.

Box 5.1: Why growth scenarios cannot be defined at the current stage

The current situation is that officer-led work to identify and appraise site allocation options has concluded that the total capacity of non-committed site options reasonably in contention for allocation is 54,000 – 69,000 homes. Combining this with the aforementioned completions and commitments figure (22,000 homes) and a windfall assumption (7,400 homes) leads to a total supply of circa 82,000 – 99,000 homes,¹⁰ which is in the region of the total supply needed if the housing requirement is to be set in line with local housing need (LHN), and there is every reason to believe that the housing requirement must indeed be set at (or above) LHN, as discussed below.¹¹

It is crucially important to note that the supply figure of 54,000 – 69,000 homes from allocations is only an interim position at the current time. It is published for consultation as a ‘direction of travel’ with a view to sparking debate and ultimately gathering evidence to inform plan finalisation.

This is a point discussed further below.

However, this interim position has to be taken as the basis for defining reasonable alternatives at the current time and the implication is that it is currently not possible to define RA growth scenarios.

Taking broad categories of possible RA growth scenarios in turn:

- Lower growth – it is difficult to suggest that there are any reasonable scenarios whereby elements of the direction of travel supply from allocations (54,000 – 69,000 homes) are not taken forward, because total supply would drop too low relative to LHN.
- An alternative distribution – it is difficult to suggest any reasonable scenario whereby elements of the direction of travel supply are not taken forward and the resulting supply shortfall is made good by the allocation of ‘omission sites’, i.e. site options that are reasonably in contention for allocation but not supported on balance. As discussed, all site options currently understood to reasonably in contention for allocation feed into the direction of travel supply.
- Higher growth – is difficult to suggest that there are any reasonable scenarios whereby omission sites are allocated such that total supply from allocations increases beyond 54,000 – 69,000 homes. This is because there are not considered to be any omission sites, as discussed.

Subsequent to the current consultation there will be more supply options to choose from, such that there will be a choice between site options reasonably in contention for allocation, i.e. a choice as to whether any given site should be an allocation or an omission site. However, at the current time there is no clear choice in this regard, and, in turn, RA growth scenarios cannot be defined.

- 5.1.2. In summary, the time to explore RA growth scenarios will be subsequent to the current consultation, at which time it is expected that there will be more in the way of choice open to the Council, i.e. decisions to be made between sites for allocation.
- 5.1.3. In turn, at this stage it is appropriate to focus on alternative *strategic* options in order to build understanding that will feed into future work to explore growth scenarios.
- 5.1.4. Specifically, the focus at the current stage is alternatives in respect of:
- Growth quanta; and
 - Broad spatial strategy.

¹⁰ Calculating a windfall assumption is a technical exercise that need not be a focus here. It largely involves projecting forward past trends, although cautious account can be taken of factors that suggest past trends may not continue, i.e. looking forward it is fair to conclude that specific types of windfall supply will likely come forward at rates above/or below the past trend.

¹¹ LHN over the plan period is $4,332 \times 21 = 90,972$ homes. Additionally, there must be a supply buffer as a contingency for delivery risk, which might be 5% although it could be higher. Assuming 5%, then the total supply ‘target’ is ~95,500 homes.

5.2. Growth quanta

- 5.2.1. A central tenet of local plan-making is the need to **A)** objectively establish needs ('policy-off'); and then **B)** develop a response to those needs through the local plan ('policy-on').
- 5.2.2. Planning Practice Guidance explains: *"Housing need is an unconstrained assessment of the number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from... establishing a housing requirement..."*
- 5.2.3. With regard to (A), the NPPF states that local housing need (LHN) should be established via an assessment *"conducted using the standard method"*.
- 5.2.4. With regard to (B), most local authorities respond to LHN by setting a housing requirement that equates precisely to LHN. However, under certain circumstances it can be appropriate to set a housing requirement that departs from LHN.
- 5.2.5. For Buckinghamshire the Government's standard methodology establishes an **LHN** figure of 4,332 dwellings per annum (dpa), or 90,972 homes over the plan period. This will change modestly over time as the inputs to the standard method are adjusted, namely: A) the calculation of local dwelling stock; and B) the local affordability ratio.
- 5.2.6. Setting the **housing requirement** at 4,332 dpa over the plan period and identifying a supply sufficient to deliver on the requirement is challenging but achievable assuming a carefully selected strategy and associated suite of site allocations. Delivery has averaged ~2,900 dpa over the past three years, and the maximum rate of delivery since 2001 has been 3,751 dpa, but a new Local Plan could support a boost to delivery.
- 5.2.7. This being the case and also given that there are extensive part of Buckinghamshire that are free from 'headline' constraints to growth (NPPF para 11bi), there is a case for ruling out the possibility of a housing requirement set below LHN as 'unreasonable'.
- 5.2.8. This is also the case because a requirement set below LHN means generating 'unmet need' that must then be provided for elsewhere and, in reality, there is little if any possibility of Buckinghamshire exporting unmet need to a neighbouring area (see discussion below). Where there is no arrangement in place in respect of unmet need the simple case is that the evidential bar is set very high in respect of justifying unmet need; indeed, it has been widely suggested that in such cases LHN is now essentially a 'mandatory target' for the purposes of deciding a housing requirement.
- 5.2.9. However, on the other hand, it is not possible to categorically rule-out the possibility of a housing requirement set below LHN at this early stage, broadly because:
 - Whilst there are extensive part of Buckinghamshire that are free from 'headline' constraints to growth (NPPF para 11bi) it could transpire that focusing growth in these areas does not amount to sustainable development all things considered, i.e. accounting for "policies in [the NPPF] taken as a whole" (NPPF para 11bii) and recalling that sustainable development is the purpose of planning (NPPF paras 1 & 7).
 - The very fact that it is currently not possible to identify a supply (from sites reasonably in contention for allocation) sufficient to allow the housing requirement to be set at LHN serves as an indication that a housing requirement set at LHN may not amount to sustainable development. The current situation for Buckinghamshire is in contrast to the typical situation, which is one whereby reasonable supply options have a total capacity well in excess of what is needed/required, such that the local plan-making process can then explore different options / combinations of options ('scenarios') in order to explore varying implications for sustainable development objectives.
 - As discussed, committing to a housing requirement set at 4,332 dpa would mean committing to delivering housing at a rate significantly above what has been delivered in the past, and doing so year on year over the plan period. It is crucially important that any local plan only commits to a housing requirement that is deliverable.

- 5.2.10. In light of the above points, it is reasonable to remain open to the possibility of a housing requirement below LHN (i.e. generating unmet housing need) at the current time.
- 5.2.11. However, it is only reasonable (even at this early stage) to consider the possibility of a housing requirement *modestly* below LHN. The key reasoning for this conclusion can be understood from the discussion above, but a final point to also note is that whilst local authorities to the north of Buckinghamshire are notably subject to little or no constraint in terms of Green Belt and National Landscapes, and options for 'exporting' housing need could feasibly be explored, it would undoubtedly prove very difficult to successfully export housing need in the absence of a strategic plan to guide the process. Also, with regards to Bedfordshire and (in particular) Northamptonshire, there is also a need to recognise that Buckinghamshire does not link as closely to these areas (in terms of housing markets and travel to work areas) than is the case for other neighbouring areas.
- 5.2.12. The final question is then whether, at this stage, there is a high-level case for remaining open to the possibility of a housing requirement set *above* LHN.
- 5.2.13. This is an important consideration across the south of England, as there are numerous sub-regions and groups of local authorities where unmet need is a very clear and pressing issue, such that centrally important to plan-making is exploring 'high growth' scenarios involving a housing requirement set above LHN in order to make some provision for unmet need. For example, this is the case for the Oxford sub-region and across much of Surrey, Sussex and South Hampshire (also extending to Dorset).
- 5.2.14. For Buckinghamshire, the possibility of providing for unmet need from one or more neighbouring authorities is not a 'clear and pressing' issue but unmet need risk is nonetheless a factor for the local plan, including noting NPPF para 28, which deals with "effective and on-going joint working" and explains: "*Plans come forward at different times, and there may be a degree of uncertainty about the future direction... In such circumstances... authorities... will need to come to an informed decision on the basis of available information, rather than waiting for a full set of evidence from other authorities.*"
- 5.2.15. Taking Buckinghamshire's neighbouring local authorities in turn:
- Cherwell – the Proposed Submission Local Plan was published in December 2024 providing for LHN in full (with a total supply identified amounting to LHN plus 23%) plus a proportion of Oxford City's unmet housing needs. However, LHN was taken to be 706 dpa (old standard method) rather than 1,118 dpa (new standard method) on the basis of the transitional arrangements set out in the new NPPF (December 2024) and, furthermore, there is an ongoing discussion regarding Oxford City's unmet housing needs and how these should best be provided for. Delivery averaged 1,119 dpa over the period 2019/20 to 2023/24 (accounting for 792 homes in 2023/24) and overall there is no risk of unmet need from Cherwell, but it is important to recognise that supporting the growth of Oxford is a sub-regional challenge (and opportunity).
 - West Northamptonshire – a Draft Local Plan was published for consultation in 2024 proposing to set the housing requirement at LHN. Standard method LHN then subsequently increased by 18% in December 2024, but there is no risk of unmet need.
 - Milton Keynes – a Draft Local Plan was published for consultation in 2024 proposing to set the housing requirement at LHN, although with scope to potentially set LHN at a figure above LHN to reflect local growth ambitions, recognising that the identified supply amounted to LHN plus 18%. Also, it is important to note that the plan period extends to 2050 with the aim of supporting the delivery of a long-term vision for growth.
 - Central Bedfordshire – a new Local Plan is in the early stages of preparation, and it is notable that recent delivery (2,289 dpa) is higher than standard method LHN (2,150 dpa). However, it is also important to note that the adopted Local Plan (2021) provides for 7,500 homes unmet need from Luton where unmet need is an ongoing issue. There are some notable constraints including the Chilterns NL and Green Belt, but overall it is very difficult to envisage a case for unmet need flowing to Bucks. There are strategic growth opportunities in the north of the plan area which, whilst overall quite rural, includes areas with potential to link to growth areas including Cambridge.

- Dacorum – a new Local Plan was submitted in early 2025 under ‘transitional arrangements, meaning that LHN is taken to be 1,016 dpa rather than the new standard method figure of 1,355 dpa. The Submitted Local Plan included a supply 1% above LHN, but the Inspectors subsequently determined a need to amend the plan period and, on this basis, the supply falls below LHN. This suggests that unmet need is an issue or at least a risk. However, most recently (June 2025) the Inspectors wrote to the Council asking: “... *how could this Plan be modified in a way that would ensure that housing needs are met as part of a positively prepared strategy?*”

It is important to recognise that Dacorum is significantly constrained most notably on account of the Chilterns NL and the Chilterns Beechwoods SAC. However, Dacorum links more closely to the other SW Herts authorities than it does to Buckinghamshire.

- Three Rivers – in October 2023 the Council published a consultation document proposing a strategy of “Low Housing Growth and Green Belt Restraint”. The consultation document identified supply totalling ~4,850 homes, which was ~6,600 homes short of LHN as it stood at the time (such that unmet need could easily have been ~7,000 homes after having factored in the need for a supply buffer). In October 2024 the Council then decided to pause and reconsider the plan, and it is now anticipated that the Local Plan will be published under Regulation 19 later in 2025. Standard method housing need has now increased by 30% to 832 dpa and this is in the context of recent delivery averaging 202 dpa, such that there is a clear risk of unmet need. However, again Three Rivers forms part of the SW Herts sub-region (and it should be noted that a strategic plan for the sub-region is in preparation; see [here](#)).
- Hillingdon / Greater London Authority – a new Hillingdon Local Plan is at an early stage of preparation and will likely be able to provide for the current London Plan housing ‘target’ of 1,083 dpa in full, given recent delivery averaging 795 dpa. However, a new London Plan is now in preparation, and a commitment has been made to providing for standard method housing need in full, whether that be within London or with some unmet need provided for outside of London via the Duty to Cooperate. If the new standard method LHN were to be provided for in full *within London* this would mean a major step change in delivery, with LHN 88,000 dpa compared to delivery of 32,000 homes in 2023/24 (and, within this, the number of affordable housing starts fell by 88% compared to the previous year; discussed [here](#)). Within London’s standard method LHN figure of 88,000 dpa there is also a figure for Hillingdon of 2,292 dpa, but it will be for the new London Plan to assign the Borough a new ‘target’ accounting for this need figure alongside wider factors including infrastructure capacity. Overall, unmet need from London is a risk, but not one that can be quantified to any extent ahead of work on the new London Plan.
- Slough – the current Local Plan looks only to 2026 (in the context of the NPPF requiring local plans to be reviewed every five years and look ahead 15 years) and there has been no consultation on the emerging Local Plan since 2021. The possibility of exporting some unmet need to Buckinghamshire has long been a consideration, given: A) very limited potential for greenfield expansion within the Borough boundary; and B) very close links, indeed, unmet need could potentially be provided for by one or more urban extensions of Slough into Buckinghamshire. However, it is noted that recent housing delivery has averaged 560 dpa, which is not all that far short of standard method LHN (808 dpa). The intention is to consult on a Regulation 19 Local Plan next year and then submit the Local Plan for examination by December 2026.
- Windsor and Maidenhead – a Local Plan was adopted in 2022, and a review is yet to commence. A standard method LHN figure of 1,449 dpa does not compare favourably to recent delivery averaging 487 dpa. However, even if there were any risk of unmet need it is difficult to envisage a strong argument for this flowing in the direction of Buckinghamshire, with a more likely direction westwards along the M4 corridor.
- Wokingham – a new Local Plan was submitted in early 2025 under ‘transitional arrangements, meaning that LHN is taken to be 748 dpa rather than the new standard method figure of 1,336 dpa. There is also a healthy ‘supply buffer’, with total supply 10% above the housing requirement (LHN), although it is noted that the plan period runs only to 2040. Recent delivery is 1,044 dpa and, overall, no unmet need risk.

- South Oxfordshire – a Joint Local Plan with Vale of White Horse District was submitted in 2024 under ‘transitional arrangements’ meaning that its starting point is an understanding of LHN on the basis of the 2023 standard method, which is 579 dpa, as opposed to the new standard method which provides a figure of 1,234 dpa. There is also the question of whether the Joint Local Plan should additionally make provision for unmet need from Oxford and, if so, how much, with this matter a key focus of the ongoing examination in public. Recent delivery has averaged 1,076 homes (2021-24).
- 5.2.16. There are other local authorities that could be discussed as feasible generators of unmet need that could feasibly flow towards Buckinghamshire, but it is considered appropriate to focus on the authorities discussed above as those most closely linked.
 - 5.2.17. Another consideration is impending Devolution (Spatial Development Strategies) and Local Government Reorganisation (LGR), which will likely affect certain of the above local authorities prior to local plan finalisation. Under Devolution and LGR the expectation is that there will be reduced risk of unmet need being generated, albeit there is also a timing factor, as new plans under Devolution and LGR will take time to prepare.
 - 5.2.18. Overall, the conclusion is that the risk of unmet need from Slough and potentially elsewhere must factor in to local plan making and, in turn, at the current early stage in the plan-making process it is reasonable to remain suitably open to the possibility of the Local Plan for Buckinghamshire setting a housing requirement above LHN.¹²
 - 5.2.19. However, it is only reasonable (even at this early stage) to consider the possibility of a housing requirement *modestly* above LHN. Key reasoning for this conclusion can be understood from the discussion above, but a final point to also note is the extent of NPPF paragraph 11 constraints affecting the southern part of Buckinghamshire. Whilst it is clearly reasonable to explore weighting growth to the north, there will be limits to the level of growth that can reasonably be accommodated over the plan period in this area (i.e. it is difficult to envisage the north of Buckinghamshire accommodating *both* a high proportion of Buckinghamshire’s LHN *and* a high level of unmet need from outside of Buckinghamshire). Also, and in any case, the north of Buckinghamshire is relatively distant from Buckinghamshire’s more constrained neighbouring areas.
 - 5.2.20. In **conclusion**, at this stage there is a clear case for focusing on the strong likelihood of setting the housing requirement at LHN, which is very much the default approach. Also, it is the case that a clear focus in this regard helps to expedite plan-making.
 - 5.2.21. However, it is not possible to categorically rule out the possibility of a housing requirement that departs from LHN at this early stage in the plan-making process, i.e. before having completed detailed work to explore supply options and growth scenarios.
 - 5.2.22. As such, there are three reasonable growth quanta alternatives at this stage:
 - 1) Set the housing requirement modestly below LHN, e.g. LHN minus 10%
 - 2) Set the housing requirement at LHN (the emerging preferred approach)
 - 3) Set the housing requirement modestly above LHN, e.g. LHN plus 10%

¹² Beyond the matter of unmet need, there is a need to consider the possibility of setting the housing requirement above LHN on the basis of “growth ambitions linked to economic development or infrastructure investment” (NPPF para 69). In short, there is not a strong case for Buckinghamshire, but this is discussed further below as part of the appraisal of growth quanta alternatives.

5.3. Broad spatial strategy

- 5.3.1. As discussed above, there is currently little in the way of choice available to the Council in respect of spatial strategy given: A) a lack of reasonable supply options; and B) it being unlikely that a case could be for a housing requirement set below LHN.
- 5.3.2. However, subsequent to the current consultation it is expected that there will be more in the way of choice open to the Council following: further HELAA work (accounting for new site submissions and informed by Green Belt Assessment); completion of a New and Expanded Settlements Study (NESS); the Government's New Towns Taskforce having reported; and completion of key local evidence-gathering workstreams. See Box 5.2.

Box 5.2: Ongoing and future workstreams that will inform supply options at the next stage

As discussed, at this stage whilst there is a direction of travel supply from new site allocations this is only an interim position ahead of further work to explore supply (site and strategy) options at the next stage. Workstreams that will feed in are as follows:

- Housing and Economic Land Availability Assessment (HELAA) – the current direction of travel supply is arrived at on the basis of HELAA work completed to date, but it is acknowledged that not all sites that have been submitted as available have yet been assessed through the HELAA. Also, it is important to note that HELAA is a limited exercise that does not aim to be the final word on the selection of sites for allocation, including because it looks at sites in isolation with limited consideration of in-combination effects.
- Green Belt Assessment (GBA) – a GBA is currently ongoing focused on identifying grey belt, in line with the Planning Practice Guidance (PPG) published in February 2025. Forthcoming understanding of grey belt will be a key factor informing spatial strategy and site selection in the south of Buckinghamshire, which mostly falls within the London Metropolitan Green Belt. This is on the basis of NPPF paragraph 148, which states: *“Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations.”* Once grey belt has been identified this will need to feed into the HELAA, and additional site submissions can be anticipated.
- New and Expanded Settlement Study (NESS) – a shortlist of strategic growth options has been identified including both sites submitted to the Council as available and wider areas of land where the Council is prepared to potentially work with landowners with a view to reaching a point where the land is available, e.g. overseeing ‘land assembly’ where landownership is fragmented. This is a key workstream but is currently at an early stage (to be clear, not outcomes of the NESS are published as part of the current consultation).
- New Towns – the Government's New Towns Taskforce is due to report on a shortlist of locations to deliver New Towns able to support a population of at least 10,000 homes. Whilst implications for Buckinghamshire cannot be foreseen, were there to be one or more Government New Towns within or close to Buckinghamshire there would be significant implications. This is particularly the case as the Government has made clear that housing supply from New Towns allocated via the Taskforce will not count towards meeting Local Housing Need (LHN), albeit they would come with major Government funding and wider support, e.g. to deliver infrastructure that, in turn, could assist with delivering LHN. All this being the case, there is a strong chance that the outcome of the Government's New Towns Taskforce work will have a major bearing on spatial strategy / site selection moving forward.
- Wider evidence gathering – considerable evidence-gathering work to inform spatial strategy / site selection has been completed but major workstreams remain ongoing. This is an inevitability, and it is recognised that there is a need to ‘twin-track’ spatial strategy / site selection and evidence-gathering, including in respect of infrastructure planning.
- Targeted SA – there will be potential for targeted appraisal work to explore the merits of options/alternatives/scenarios on a settlement level, but again this will be for the next stage.

- 5.3.3. As such, it is important to broach the matter of broad spatial strategy now, i.e. begin to explore issues and options, which can then be explored in more detail at the next stage.
- 5.3.4. With regards to the question of precisely what broad spatial strategy options to explore, as an initial point it is important to state that there are myriad broad strategy issues and options for local plan-makers to consider, and so condensing and combining these to form a discrete set of alternatives involving a clear mutually exclusive choice (as per the growth quanta alternatives above) is inherently challenging.
- 5.3.5. For example, there are potentially important choices to be made in respect of:
- Concentrating growth versus dispersal and the somewhat related matter of supporting strategic allocations versus medium-sized and/or small sites;
 - Distributing growth in line with the settlement hierarchy versus departing from the settlement hierarchy in either direction (i.e. with more growth weighted more to settlements higher or lower in the hierarchy) or departing entirely from the settlement hierarchy entirely via support for one or more new settlements; and
 - Weighting growth in support of particular plan objectives (Section 2).
 - Greenfield versus brownfield sites – although there is a need for caution, maximising brownfield supply can be somewhat a ‘given’ in policy terms, with the more pertinent question around precisely what can be delivered in light of detailed technical factors.
- 5.3.6. In practice, for Buckinghamshire, Officer-led work to date has led to a conclusion that key broad spatial strategy questions are around:
- Brownfield sites – as discussed there is relatively little in the way of policy choice.
 - Greenfield sites at main towns – must clearly deliver a good proportion of growth, but there is a key question around what is meant by ‘a good proportion’.
 - Greenfield sites at other settlements – can be placed into four categories:
 - Settlements where there is potentially a growth opportunity on the basis of comprising or relating closely to one or more key transport hubs.
 - Settlements where there is potentially a growth opportunity on the basis of comprising or relating closely to one or more key employment areas.
 - Settlements at the very edge of Buckinghamshire (whether inside, part inside, abutting or near abutting) where cross border collaboration is a key consideration.
 - Other settlements with no particular growth opportunity from either a transport or an employment perspective, including the great majority of villages.
- For each of these settlement categories there is potentially a strategic choice in respect of growth quantum or could be at the next stage of plan-making.
- New settlements – there will clearly be a need for at least one new settlement, given: the stretching nature of LHN and a clear case for a housing requirement set at LHN (also the case for remaining open to higher growth); limited supply options and/or strategic growth challenges at existing settlements; and a case that can be made for directing a proportion of growth to new settlements (e.g. see NPPF para 77). The question is how many, which ones and what scale of growth to support at each.
- 5.3.7. It is recognised that placing settlements into categories will always lead to some debate and that the above reflects a ‘best fit’ approach. However, the above is overall supported, as categorising supply options and then exploring strategic issues and options for each category helps to ensure accessible and engaging plan-making.
- 5.3.8. The emerging direction of travel supply (both commitments and allocations) on the basis of the *initial* work undertaken to date (as discussed) is set out in the Table 5.1.

N.B. it is important to be clear that this is no more than a **direction of travel and further work is being undertaken that will feed in at the next stage.**

Table 5.1: The housing supply direction of travel

Supply category	Potential supply (direction of travel)
Commitments and allocations 1: Brownfield sites	1,500-2,500
Commitments and allocations 2: Main towns	23,000-28,000
Commitments and allocations 3: Transport hubs	16,000-19,000
Commitments and allocations 4: Settlements near employment areas	5,000-6,000
Commitments and allocations 5: Edge of Buckinghamshire	6,000-7,000
Commitments and allocations 6: Other settlements	13,000-15,000
Commitments and allocations 7: New towns	11,000-13,000
Windfall	7,400
Total direction of travel supply	82,000-99,000
% above or below LHN (91,000)	Between -10% & +9%

5.3.9. The task is to define alternative ways of distributing growth between these supply categories, but there is no way to do this with any precision, as discussed above, but in summary because: A) the direction of travel supply is an interim position on the basis of limited work to date; B) there are not currently known to be any omission sites (i.e. sites reasonably in contention for allocation but not included in the direction of travel supply); and C) there is very strategic limited case to be made for a housing requirement < LHN.

5.3.10. On balance, at this stage it is reasonable to appraise the emerging direction of travel supply alongside alternatives where each would involve increased emphasis on supply from one category and commensurately less of an emphasis on the others.

5.3.11. Hence there are eight broad spatial strategy alternatives at this stage:

- 1) The emerging preferred approach (direction of travel)
- 2) Added emphasis on brownfield sites
- 3) Added emphasis on main towns
- 4) Added emphasis on transport hubs
- 5) Added emphasis on settlements near key employment areas
- 6) Added emphasis on settlements at the edge of Bucks
- 7) Added emphasis on other settlements
- 8) Added emphasis on new settlements.

5.4. Conclusion on reasonable alternatives

5.4.1. The scope of reasonable alternatives (RAs) at the current time aims to respond to the relatively early stage of the plan-making process. Whilst officers have undertaken work to identify site options with a reasonable case for allocation, this is only an interim position and so a direction of travel for consultation. The key time for exploring site options and combinations of site options ('growth scenarios') in detail will be subsequent to the current consultation and, this being the case, at this stage it is reasonable to focus attention on RAs in respect of strategic factors and specifically:

- Growth quantum – three alternatives are defined.
- Broad spatial strategy – eight alternatives are defined.

6. Reasonable alternatives appraisal

6.1. Introduction

6.1.1. The aim here is to appraise the RAs defined above, namely:

- Three growth quantum RAs – see Section 6.2
- Eight broad spatial strategy RAs – see Sections Section 6.3.

Appraisal methodology

6.1.2. Whilst “appraisal” means reaching conclusions on significant effects for each of the options in turn, in this instance it is inherently difficult to reach conclusions on significant effects because of the high-level nature of the alternatives. Specifically:

- Growth quantum RAs – it is inherently difficult to confidently reach conclusions on significant effects without knowledge of spatial strategy or site allocations.
- Broad spatial strategy RAs – it is inherently difficult to reach conclusions on significant effects without knowledge of growth quantum (although it is reasonable to assume a housing requirement set at or in the region of LHN) or site allocations.

6.1.3. This being the case, what is considered more important than reaching ‘absolute’ conclusions on significant effects across the RAs is simply reaching conclusions on their ‘relative’ merits. Further methodological discussion is presented below.

6.1.4. It is important to add that the aim of the appraisal is to spark discussion and stimulate consultation responses, particularly from those key stakeholder organisations whose evidence will be crucially important at the next stage of plan-making, i.e. as part of work to explore RA growth scenarios (see discussion above) and ultimately arrive at a full draft plan comprising site allocations to deliver on needs and wider plan objectives.

Assumptions

6.1.5. A key assumption is in respect of the future baseline (very important, as effects are predicted *on the baseline*), i.e. the situation without an adopted plan with a robust land supply. Specifically, the assumption is that there would be further sub-optimal growth under the presumption in favour of sustainable development, with wide-ranging impacts.

6.1.6. Other key assumptions are around implications of the Buckinghamshire Local Plan for the wider sub-region. In particular, there is a need to account for the fact that a housing requirement < LHN would lead to unmet need that generates pressure elsewhere in a constrained sub-region and, vice versa, a requirement > LHN could allow for some provision for unmet need that takes pressure off constrained locations elsewhere. These ‘larger than local’ considerations are a key factor for the current appraisal, but it is inherently difficult to explore them and reach conclusions with any degree of certainty.

6.2. Growth quantum

Introduction

- 6.2.1. As discussed in Section 5, at this stage there are three reasonable growth quanta alternatives for appraisal and consultation:
- 1) Set the housing requirement modestly below LHN, e.g. LHN minus 10%
 - 2) Set the housing requirement at LHN
 - 3) Set the housing requirement modestly above LHN, e.g. LHN plus 10%
- 6.2.2. With regards to methodology, on balance it is considered appropriate to simply present a discussion under each of the SA framework headings (see Section 3) in turn.
- 6.2.3. In practice, a focus is on discussing how well-suited to growth Buckinghamshire is in comparison to neighbouring local authorities within the sub-region.

Accessibility

- 6.2.4. Accessibility to community infrastructure is often a key issue for local plans, and it is crucially important to demonstrate that steps are being taken to minimise issues (e.g. in terms of capacity at schools and health facilities) and realise opportunities including in terms of growth delivering of facilitating community infrastructure that benefits existing communities ('planning gain'). This is a key means of building support for local plan-making, also recalling that the baseline situation is one whereby growth continues at pace in a relatively piecemeal and ad hoc way in the absence of a Local Plan.
- 6.2.5. There can be a strong argument for directing growth to strategic-scale sites that will deliver new and upgraded community infrastructure alongside housing growth (also transport and green/blue infrastructure). As discussed, the goal can be to both meet the needs of the new community (thereby minimising pressure on existing infrastructure) and also secure benefits for existing communities. There can also be important cross-border considerations where development connects into an existing urban area on the edge of Buckinghamshire, for example in respect of secondary school provision.
- 6.2.6. A Baseline Infrastructure Study (BIS) has been completed that does demonstrate a range of issues such that there are risks associated with growth in some parts of Buckinghamshire. However, there is little reason to suggest that issues could not be minimised and/or addressed through spatial strategy and site selection.
- 6.2.7. It is understood that health infrastructure capacity is key issue; however, and by way of context, it is important to note that it has historically been challenging to avoid issues and realise opportunities through spatial strategy and site selection because of a challenge aligning with Government and NHS policy and because issues relate to factors other than the availability of sites for facilities. See further discussion below.
- 6.2.8. With regards to 'high growth', it could well be the case, given the discussion presented in Section 5, that options to deliver strategic growth locations become exhausted (including accounting for market factors / deliverability), such that there is a need to rely more on non-strategic growth locations than would ideally be the case.
- 6.2.9. Also, it might be suggested that there are opportunities for strategic growth locations outside of Buckinghamshire over-and-above those that exist within Buckinghamshire, including locations well linked to Oxford, Milton Keynes and Cambridge.
- 6.2.10. Furthermore, a consideration is that whilst work to consider strategic growth options might focus on the north of Buckinghamshire, given lower environmental constraint, this part of the County has relatively limited public transport infrastructure and a dispersed pattern of higher order settlements, with implications for accessibility objectives.

- 6.2.11. However, overall there is no way to say with any confidence that a modestly higher or lower growth strategy (i.e. setting the housing requirement at a figure modestly above or below LHN) would have any significant implications for the ability to avoid issues and realise growth-related opportunities around accessibility to community infrastructure.

Air quality

- 6.2.12. It is difficult to suggest that Bucks is particularly constrained in the sub-regional context, in respect of air quality. There are several Air Quality Management Areas (AQMA; several were recently revoked), but these cover a very small proportion of the County and numerous neighbouring areas are also subject to significant constraint. This includes all the London Boroughs, Maidenhead, Slough, Oxford and Bicester.
- 6.2.13. Having said this, Milton Keynes and South Northants are fairly unconstrained, as is much of Central Beds (bar Luton/Dunstable).
- 6.2.14. In this light, it is difficult to foresee air quality being a significant factor with a bearing on any future discussions regarding the possibility of a housing requirement that departs from LHN. However, this conclusion could feasibly be revisited subsequent to work having been completed to explore spatial distribution and supply options.
- 6.2.15. A key consideration is the southern half the County, where there is significant constraint affecting High Wycombe and Marlow (also, a large AQMA covering the Ivers was recently revoked), as well as constraint affecting nearby towns and the London suburbs.
- 6.2.16. Looking at the north of the County, there is overall limited 'sustainable transport' opportunity in comparison to the south of the County (as discussed), but it is difficult to suggest that this translates into a concern in terms of air quality. Also, there are sustainable transport opportunities to explore, including relating to a new East-West Rail station at Winslow. As well as serving the residents of Winslow, it will be important to consider bus and cycle connections to nearby villages and Buckingham.

Biodiversity

- 6.2.17. Buckinghamshire can be described as relatively constrained in the sub-regional context, broadly speaking. However, the situation is very nuanced, with sensitivity varying within the County and key areas of sensitivity crossing over into neighbouring authorities. On this later point, this is most notably the case for the Chilterns (of national and international biodiversity significance mainly relating to ancient woodlands and unimproved chalk grasslands) and the Midvale Ridge (a geological feature and national character area associated with a high biodiversity and wider value).
- 6.2.18. Also, there are two broad areas neighbouring Buckinghamshire that are potentially subject to a degree of strategic biodiversity constraint that could feasibly contribute to a case for exporting unmet need (albeit not necessarily to Buckinghamshire). Firstly, to the east of Bucks, the Dacorum area is constrained on account of recreational pressure on the Chilterns Beechwoods SAC (Ashridge Commons and Woods), albeit very good progress has recently been made on agreeing and implementing a mitigation strategy. Secondly, to the south of Bucks, Slough is constrained by proximity to Burnham Beeches and Windsor Great Park, plus land to the south of Slough is subject to the extensive constraint of the Thames Basin Heaths. Even where mitigation strategies are in place there is a need to acknowledge the mitigation hierarchy, i.e. the need to avoid issues/impacts in the first place ahead of relying on mitigation, as far as possible.
- 6.2.19. Finally, there is a need to note ongoing work in respect of a Buckinghamshire and Milton Keynes Local Nature Recovery Strategy (LNRS). A LNRS will assist with achieving biodiversity net gain (BNG) as part of developments schemes, including by ensuring a strategic approach to biodiversity 'offsetting', i.e. achieving biodiversity gains through offsite interventions sufficient to demonstrate that a development scheme will result in a sufficient overall net gain despite onsite biodiversity losses.

Climate change adaptation

- 6.2.20. Fluvial flood risk, which is typically the primary climate change adaptation / resilience consideration for local plans, is spatially concentrated at a range of scales, including: A) broadly within the Vale of Aylesbury, where the River Thames and its tributaries are associated with wide flood plains; B) broadly within the upper reaches of the River Ray (the 'Upper Ray Meadows', which is a rural landscape of high biodiversity value); and C) within the historic cores (also industrial and commercial areas) of a number of towns and villages historically associated with a river corridor, including Marlow and Bourne End (associated with the River Thames) and High Wycombe (the River Wye).
- 6.2.21. However, it will clearly be possible to avoid sensitive development in areas of flood risk (mindful of climate change scenarios) under any reasonably foreseeable growth scenario, such that flood risk is highly unlikely to have a bearing on the housing requirement. Also, there is a need to recognise that generating unmet need could feasibly create challenges sub-regionally, given nearby constrained cities and towns, e.g. Oxford, Milton Keynes, Bedford, Reading, Bicester, Maidenhead and Slough.

N.B. in addition to fluvial (river) flood risk, there are also other forms of flood risk that could worsen under climate change scenarios (surface water, ground water and sewer flooding), but these other forms of flooding are less likely to have a bearing on the question of total growth quantum provided for through the Local Plan.

Climate change mitigation

- 6.2.22. It is reasonable to focus on per capita rather than total greenhouse gas emissions. Also, it is reasonable to assume that any unmet housing need from Buckinghamshire would need to be met elsewhere. On this basis, it is difficult to suggest that decarbonisation objectives *necessarily* serve an argument for planning for low growth in Buckinghamshire, i.e. setting the housing requirement at a figure below LHN.
- 6.2.23. A second key point to make is in respect of transport emissions (also see discussion under 'transport' below). There is a *clear case* for meeting housing needs as close to source as possible, and also co-locating jobs and homes, with a view to minimising greenhouse gas emissions from transport.
- 6.2.24. Finally, there is a need to question whether Buckinghamshire is associated with any barriers or opportunities (relative to neighbouring areas), in respect of delivering growth in a way that serves to minimise per capita greenhouse gas emissions from both transport and the built environment.
- 6.2.25. It is difficult to reach any firm conclusions, but broad considerations can relate to the extent to which there will be the potential to direct a high proportion of growth to: strategic growth locations (which can represent a decarbonisation opportunity over-and-above small/medium sites); locations with strong development viability (viability is strong across much of the County); and locations that align well with strategic transport objectives (e.g. a key opportunity relates to East West Rail).
- 6.2.26. There is also the question of the extent to which Buckinghamshire is suited to large-scale renewable generation (e.g. solar farms). However, large-scale renewable energy schemes typically feed into the national grid, as opposed to providing electricity directly to nearby communities and, in turn, are rarely delivered, or enabled, by housing-led development schemes. In turn, it is difficult to foresee this having a bearing on growth quantum, e.g. serving as an argument for higher growth.
- 6.2.27. A key question, moving forward, will be around the potential for the Local Plan to require 'net zero development' with development proposals judged using a strict definition (of net zero) and robust methodology – see Box 6.1.

Box 6.1: Defining net zero development

There are three key points. Firstly, any approach to net zero development must align with the energy hierarchy, which means a primary focus on efficiency ('fabric first') followed by onsite renewable heat/power generation, with offsetting of residual needs that cannot be met onsite (over the course of a year) as a last resort. Secondly, there are two broad approaches to calculating net zero and evaluating proposals, namely 1) the methodology applied under the Building Regulations; and 2) an energy-based approach.¹³ Thirdly, whilst the focus is typically on 'operational' emissions, i.e. emissions as a result of the development's operation, there are also emissions associated with the 'whole life cycle' of a development, to include construction, maintenance, retrofitting and demolition (often referred to as 'embodied' emissions).

Communities and health

- 6.2.28. Growth can clearly impact existing communities both positively and negatively, and this will be something to explore further in detail over the course of the plan-making / SA process. However, the current focus must be on the question of whether Buckinghamshire is associated with any particular issues or opportunities relative to neighbouring areas that might lead to an argument for setting the housing requirement at a figure either above or below Local Housing Need (LHN).
- 6.2.29. The short answer is that there is no certainty at this early stage. However, considerations include:
- Strategic growth locations – can be delivered in line with 'garden community' principles, with a focus on high quality new communities as well as avoiding conflicts with (and ideally benefiting) existing communities. There may be a high-level argument to suggest that Buckinghamshire is overall quite well-suited to supporting strategic growth locations, at least relative to neighbouring higher density areas to the south and southeast, where constraints are a greater barrier to strategic growth.
 - Non-strategic growth locations – will typically be associated with reduced opportunity to deliver infrastructure and wider community-focused investment alongside new homes. However, sites that are of a 'non-strategic' scale, when viewed at the scale of Buckinghamshire as a whole, can be of strategic importance for smaller settlements, i.e. villages. A number of Buckinghamshire villages in the Green Belt and/or Chilterns National Landscape have seen limited housing growth over recent years, which can lead to a range of issues, including in respect of an ageing population and maintaining services/facilities and retail. Even relatively small sites at villages can deliver targeted new community infrastructure in line with local objectives, e.g. a primary school extension, a village hall, sports pitches, a park / play space, walking/cycling infrastructure etc. This is a factor to bear in mind, but there would be potential to distribute a good proportion of growth to villages even under a lower growth scenario.
 - Health facilities – as already discussed above, historically it has been difficult to plan with a view to avoiding capacity issues at health facilities and to deliver new health facilities because it has been a challenge to integrate with Government and NHS policy. For example, a strategic urban extension could reserve space for a new health facility but there might typically be little confidence that the NHS would ultimately deliver the facility, as it might be determined that to do so would not align with policy. However, it is recognised that a Ten Year Health Plan for England was recently published that does set out a clear vision for Neighbourhood Health Facilities and, indeed, a new Neighbourhood Health Service. This potentially creates a significant opportunity to deliver new facilities as part of new residential led developments.

¹³ Under the Building Regulations methodology the question for any given planning application is the extent to which the development can improve on a Target Emissions Rate (TER), measured in percentage terms up to a possible 100% improvement. The energy based methodology involves scrutiny in absolute terms, measured in terms of kWh /m2/yr. It has wide-spread support amongst specialists, including due to the simple fact that actual 'as built' performance can be monitored using a smart meter. A high proportion of recent and emerging local plans nationally present an energy based policy. However, on 13th December 2023 a Written Ministerial Statement was released which appears to prohibit its use in local plans.

- Accessible green space – there is a deficiency in respect of strategic accessible natural green space in the north of Buckinghamshire, as is evident from Natural England’s online green infrastructure mapping resource. In contrast, the south of the County benefits from high quality accessible woodlands, a high density of nature reserves managed for access by organisations such as the Wildlife Trust and the Woodland Trust, two national nature reserves managed by Natural England (Burnham Beeches and Aston Rowant), a Regional Park (Colne Valley) and several quite highly accessible river / stream corridors (e.g. the Chess Valley). In the north of the County there are potentially growth-related opportunities to explore, for example accessibility-focused enhancements to: woodland areas including Whaddon Chase, Rushmere Forest / the Greensand Ridge and concentrations along the Mid Vale Ridge; and river corridors, for example the Claydon Brook and Padbury Brook in the Buckingham and Winslow area. Furthermore, at a local level, growth can deliver onsite green infrastructure, for example learning lessons from recent good practice at Aylesbury.
- Town centre regeneration – a good proportion of growth can and should be directed to town centres (and other urban locations in need of regeneration, potentially to include older industrial areas / sites). However, once again, there would likely be good potential to do so even under a lower growth scenario.
- Unmet need – a key issue is in respect of Slough, where there is significant relative deprivation and housing needs that potentially risk going unmet. If it can be proven – with a reasonable degree of confidence – that needs cannot be met, then neighbouring areas will need to explore options for making provision for unmet need. It is not possible to know what form such options would take, but it could transpire that there is a focus on strategic growth, with associated masterplanning etc. Regardless, making provision for unmet need from urban areas associated with relative deprivation is supported from a communities perspective, albeit there is also a need to avoid a focus on greenfield urban extension that diverts investment from urban regeneration.

Economy and employment

- 6.2.30. The Local Plan needs to help deliver land and premises to support economic growth, with an overall need for 219.4 ha of new employment land to 2045, breaking down as:
- 33.5 ha needed for offices, research and development
 - 185.8 ha needed for industrial and warehousing & distribution
- 6.2.31. However, from these headline figures the first step is to subtract supply from existing sites that can be intensified and supply from sites with planning permission. Having done so the residual target to be met through local plan allocations reduced to 45.9 ha
- 6.2.32. In addition, there is a need to recognise that the above need figures are based on a range of modelling assumptions, and that alternative assumptions can be applied that lead to higher need figures and, in turn, a higher residual target for the Local Plan.¹⁴
- 6.2.33. In particular, and as set out in the Employment and Retail Study (2025), whilst the above need figures reflect a ‘labour-supply’ scenario, there is an alternative ‘market demand’ scenario that suggests a need for the Local Plan to make provision through allocations for an additional 18.4 ha of land for industrial and warehouse uses.
- 6.2.34. A further consideration is then whether and the extent to which the Local Plan should look to make additional provision for ‘larger-than-local’ needs in respect of two key modern economy uses, specifically: A) data centres; and B) freight and logistics.
- 6.2.35. It is difficult to conclude that these larger-than-local needs should necessarily be provided for within Buckinghamshire, but there is a case for new data centres in proximity to the existing cluster in the Slough area. A further modern economy sector where needs are larger-than-local is then research and development (R&D).

¹⁴ There are also important assumptions in respect of the density of employment floorspace within sites.

- 6.2.36. In light of the above discussion, there is a clear case ‘economy and employment’ case for at least providing for LHN in full. The NPPF puts considerable emphasis on the role of local plan-making in respect of overcoming barriers to national economic growth and realising opportunities (including via increased productivity, i.e. economic output per worker / hours worked), and it could well be the case that parts of Buckinghamshire are associated with an economic growth opportunity of larger-than-local significance.
- 6.2.37. This reflects an understanding that Buckinghamshire has a high level of productivity per worker, and an understanding that the County intersects several broad growth areas/corridors of national economic significance. This is evident from Strategic Economic Plan (2016) and Local Industrial Strategy (2019) produced by the Buckinghamshire Local Enterprise Partnership (LEP), although both strategies are somewhat dated. There are also three nationally designated Enterprise Zone sites in the north of Buckinghamshire – Silverstone Park, Westcott Park and Aylesbury Woodlands – and Iver Heath is also home to globally important Pinewood Studios.
- 6.2.38. There is also a need to consider issues and opportunities associated with settlements outside of Buckinghamshire. For example: Milton Keynes is a key national growth area (including as a hub within ‘Motorsport Valley’, which extends into Bucks); Slough has a buoyant economy, given a location at the intersection of the M25 and M4, excellent rail connectivity and proximity to Heathrow; Bicester is well linked to Oxford and Milton Keynes in the context of this being currently discussed as a national priority growth area (discussed [here](#)); and Thame (close to Haddenham) links well to the M40 corridor.
- 6.2.39. New homes in Buckinghamshire will provide a workforce for nationally significant growth sectors and clusters, whilst ensuring a good spatial relationship between homes and jobs with a view to minimising commuting. Also, housing growth can and will bring with it investment in transport infrastructure that in turn can support economic objectives.
- 6.2.40. Finally, there is a key distinction between the north of Buckinghamshire, where the majority of pipeline employment supply is located (primarily at Silverstone, Aylesbury Woodlands and Wescott), and the south of Buckinghamshire where there is demand for new employment floorspace (in key sectors) but much more limited pipeline supply. The implication for this current appraisal of growth quanta alternatives is that: A) there would not be support, from an economy/employment perspective, for a low growth strategy aimed at minimising impacts to the London Green Belt; and B) ongoing consideration must be given to unmet housing needs emanating from the south including from Slough.

Historic environment

- 6.2.41. Historic environment constraint is not likely to be a significant consideration with a bearing on the question of growth quantum (albeit it is not possible to be certain ahead of detailed work to consider distribution and specific supply options).
- 6.2.42. This is for two reasons.
- 6.2.43. Firstly, historic environment constraint is often (albeit not always) relatively localised, such that it would likely be possible to avoid (also mitigate) historic environment impacts even under a higher growth scenario.
- 6.2.44. Secondly, historic environment constraint is widespread, such that it is very difficult to suggest that any one authority is more constrained than another. It might be suggested that historic environment pressures are likely to be particularly strong across the authorities to the south east of Buckinghamshire that saw the greatest 20th Century growth as part of the expansion of London. However, vice versa, it might be suggested that broad areas that saw less 20th century growth are now associated with more readily apparent historic environment sensitivity.

Housing

- 6.2.45. As discussed in Section 5, there is a need to: A) provide for LHN if possible (i.e. if consistent with wider sustainable development objectives) and mindful that successfully exporting unmet need would undoubtedly prove challenging; and B) consider providing for unmet housing need from elsewhere (if a case can be made that delivering the housing within Buckinghamshire would be in line with sustainable development).
- 6.2.46. In this light, from a pure 'housing' perspective there is a case for ruling-out the option of setting the housing requirement at a level below LHN *now*, i.e. at the current early stage in the plan making process, and also remaining open to the possibility of a housing requirement set above LHN to accommodate unmet need.
- 6.2.47. Affordable housing need can also serve as a reason for setting the housing requirement above LHN, or at least not setting it below LHN, with the PPG stating: *"An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes."*
- 6.2.48. Further work will be undertaken to establish affordable housing need; however, it is expected to be the case that need is higher than what could realistically be provided for under a scenario whereby the housing requirement is set at LHN (given that development viability typically dictates that affordable housing cannot be delivered at a rate of more than 35-45%, once account is taken of wider policy asks of developers).
- 6.2.49. Having said this though, the question of 'uplifting' to reflect affordable housing needs is very complex, as succinctly explained recently by the West Berks Local Plan Inspector:
- "... policy SP19 is expected to deliver a total of 2,190 affordable homes on market-led schemes... There would be a nominal deficit of around 3,420 against the identified need... although the link between affordable and overall need is complex as many of those identified as being in need of an affordable home are already in housing."*
- 6.2.50. Another consideration is the risk of 'uplifting' the housing requirement to account for affordable housing need only to then find that the market fails to deliver the homes (due to insufficient need/demand for market housing) leading to a risk of punitive measures (i.e. the presumption in favour of sustainable development).

Land, soils and resources

- 6.2.51. A key issue is agricultural land quality, which does vary significantly at broad spatial scales, such that there can be an argument for distributing housing growth between local authorities in order to minimise pressure on better quality agricultural land.
- 6.2.52. The importance of protecting productive and, in particular, high quality agricultural land is rising up the agenda nationally, particularly from a food security perspective. However, incremental loss of higher quality agricultural land is *typically* (N.B. subject to ongoing discussion nationally) an issue of limited significance to local plan-making (given the scale of any loss relative to the total national resource).
- 6.2.53. The nationally available dataset (which is low resolution and low accuracy, in that it does not differentiate between Grade 3a and 3b quality land) shows that the great majority of Buckinghamshire is associated with Grade 3 quality land, which may (Grade 3a) or may not (Grade 3b) be 'best and most versatile'.
- 6.2.54. This does not indicate relative sensitivity in the sub-regional context. For example, the national dataset shows much Grade 2 quality land across southern Oxfordshire and eastern Bedfordshire (i.e. more than there is in Bucks, albeit there is a dense band across the centre of the County), and there is virtually no Grade 4 quality land in Hertfordshire (whilst there is extensive Grade 4 land in the north of Bucks).
- 6.2.55. However, this is likely a marginal consideration for the sub-region, in comparison to others nationally. For example in Kent and West Sussex there are arguments for directing growth away from extensive areas of highest quality (Grade 1) land.

Landscape

- 6.2.56. The centre to south of the County is highly constrained by the Chilterns National Landscape (including its extensive landscape setting, for example extending to the southern edge of Aylesbury), as well as the London Metropolitan Green Belt (which is not a landscape designation but is indicative of a landscape that is sensitive to encroachment and loss of settlement separation, which can be issues that generate concern). Green Belt can be released through local plans, but only in exceptional circumstances, although another factor is that work is ongoing to establish which parts of the Buckinghamshire Green Belt in fact comprise grey belt, which is a new designation defined by the Government in 2024 aimed at boosting housing delivery.
- 6.2.57. In response, there may be a need to consider growth scenarios that see growth weighted towards northern parts of the County. However, there are also landscape constraints in this area that are of at least local significance, perhaps most notably landscapes associated with high points along the Midvale Ridge. Another consideration is that key settlements (Aylesbury, Buckingham, Winslow and Haddenham) are associated with relatively flat and expansive clay (vale) influenced landscapes, where containing growth and avoiding 'sprawl' can be a challenge.
- 6.2.58. In this light, landscape is likely the key factor in support of arguments for setting the housing requirement below LHN (or, at least, not ruling out the possibility of doing so ahead of further detailed work having been completed).
- 6.2.59. However, most neighbouring authorities are also subject to landscape constraint, particularly those associated with the Chilterns and/or the Thames Valley. Focusing on the latter, Oxford is associated with a characteristic landscape setting, whilst the Thames Valley between the Chilterns and London is sensitive in Green Belt terms. The Greensand Ridge, to the east, is another strategic constraint.

Transport

- 6.2.60. To reiterate a point made above, there is a clear argument for minimising carbon emissions and impacts on transport networks by providing for housing needs close to source and, failing this, at locations that are as close and well-connected to source as possible. This can often translate as a pragmatic argument for each local authority providing for its own LHN in so far as possible, but there is also a need to note that travel-to-work areas (TTWAs) and housing market areas (HMAs) can cross boundaries.
- 6.2.61. Another factor is a pragmatic need for early certainty in respect of growth quanta in support of effective planning for new and upgraded transport infrastructure. The Council is preparing Local Transport Plan (LTP) 5, which will include a new emphasis on a 'decide and provide' model of transport planning (as opposed to the previous 'predict and provide' approach), which involves taking a more strategic and long-term approach, in support of transport, climate change, economic growth and other wide-ranging objectives. There was consultation on a LTP5 Vision and Objectives in 2023.
- 6.2.62. The LTP5 might also feasibly take a cue from national strategy on the distribution of growth so as to support the realisation of nationally significant transport objectives, e.g. linked to East-West Rail in the north of the County.
- 6.2.63. Finally, there is a need to consider the findings of the Initial Transport Impacts Assessment (2024). The study concludes as follows:
- Traffic levels and delays in 2019 are already high.
 - Traffic levels and delays are forecast to increase by 2045.
 - Emissions of NO_x fall between 2019 and 2045 but particulate emissions rise.
 - CO₂ emissions fall by 2045 but not enough to meet carbon reduction pathways.
 - Traffic congestion imposes additional costs on the local economy.
 - Rail could play an important role in increasing the sustainability of future growth.

- 6.2.64. However, it is very difficult to suggest that any of these issues have a strong bearing on the question of growth quantum, because there is no suggestion that the identified issues are any worse in Buckinghamshire than elsewhere (e.g. the study finds that traffic levels are “broadly comparable to the South East”).
- 6.2.65. Similarly, with regards to the rail opportunity, whilst it is encouraging to learn about this opportunity, there is clear spatial variation with regards to the extent of the opportunity (which must feed in when considering broad spatial strategy, as discussed below), and there is no clear reason to conclude that Buckinghamshire is associated with an overall level of opportunity that differs to neighbouring areas to a significant extent.
- 6.2.66. One other headline conclusion of the Study is that traffic congestion (now and in the future once existing committed sites have built out) is a particular issue in the south of the County. This is a factor potentially with a bearing on consideration of higher growth scenarios involving a focus on making provision for unmet need.

Water

- 6.2.67. A Stage 1 Water Cycle Study (WCS) has been prepared that explores six topics.
- 6.2.68. Firstly, with regards to **water resources**, there is evidence of pressures on the environment from low water levels/flows, including rare chalk streams (four in the south of the County). As such, the Study recommends that the Council considers a domestic water efficiency target of 100l/p/d for all new homes. The context is as follows: *“Water resources are under significant pressure in the UK, and the direction of travel in water resources planning is to reduce per capita consumption in new build development below the optional building regulations standard of 110 l/p/d.”*
- 6.2.69. Assuming that the 100l/p/d can be actioned (within the constraints of development viability and recognising wider policy asks of developers with cost implications, including affordable housing), then there is little reason to suggest that water resource constraints serve as a significant reason to consider restricting growth locally, including because it is difficult to suggest that Bucks stands-out as particularly constrained in the sub-regional context (albeit groundwater / sensitive chalk aquifers feeding chalk streams are a significant constraint in the south of Bucks, as discussed further below).
- 6.2.70. It is also noted that the WCS recommends that consideration is given to achieving ‘water neutral’ developments, whereby water use is offset by improving efficiency in existing buildings. The WCS explains that: *“This approach could have particular application in strategic sites and new settlements.”* It may be the case that there are options to direct a good proportion of growth to strategic sites and new settlements.
- 6.2.71. Finally, with regards to water resources, the WCS is clear that work by the three water companies serving Buckinghamshire is an ongoing process, and the water companies need early certainty regarding growth quantum. This serves to highlight the merit in confirming the preferred housing requirement as early as possible or, at least, narrowing the housing requirement options in contention.
- 6.2.72. The other key issue is **wastewater treatment**, which is high on the agenda nationally. Capacity at existing treatment works can often be increased to accommodate increased flows (at least hydraulic capacity of the works and at storage locations on the wider network, with the other consideration being the biological and chemical capacity of the receiving water course to accept an increase in treated water in times of dry weather low flows). However, there are cost, carbon and lead-in time implications, and a risk of unforeseen issues and delays. As such, there is a need to direct growth to locations with existing ‘headroom’ as far as reasonably possible and provide the water companies with early certainty regarding growth quantum and distribution.

- 6.2.73. The WCS presents the findings of an initial analysis of headroom capacity at Wastewater Treatment Works (WwTWs), concluding that: *“Some of the WwTWs in the study area are expected to be close to or exceeding their permit during the Local Plan period. An increase in the permit limit, and / or upgrades to treatment capacity may be required at these WwTWs in order to accommodate further growth.”*
- 6.2.74. However, it is important to be clear that the assessment accounts only for ‘baseline’ growth from existing committed sites (i.e. primarily sites with planning permission) and also that some WwTW catchments cross significantly into neighbouring local authority areas. For example, the Maple Lodge WwTW at Maple Cross (to the south of Rickmansworth) also serves a large part of south west Hertfordshire. The implication is a clear need to consider cumulative impacts on capacity.
- 6.2.75. The WCS also presents an assessment of storm overflow tanks, recognising that capacity breaches leading to untreated (settled) sewage spilling into rivers is a significant issue, as shown by a summary map presented within the WCS, plus see further data [here](#) (see the brown circles, which are locations of storm overflow outlets, with the size of the circle indicating overflow frequency). However, there is no clear evidence to suggest that this is an issue particularly affecting Buckinghamshire.
- 6.2.76. Other matters considered by the WCS are:
- Water supply infrastructure – does not have a bearing on the current appraisal.
 - Wastewater collection – i.e. the sewer network. This is also an issue with limited bearing on the current appraisal, although it is the case that strategic growth can deliver significant targeted upgrades to the sewer network, including reducing reliance on combined sewer systems, i.e. separating foul and surface water.
 - Water quality – whilst a key influence on water quality is wastewater – both treated and untreated – there are also other factors, most notably agriculture. The following high level conclusion is reached:
“The modelling results suggest that rivers with Buckinghamshire may be highly sensitive to changes in wastewater discharge for Ammonia and Phosphate and moderately sensitive for Biochemical Oxygen Demand (BOD)... There is a potential for this to cause a deterioration in water quality... A significant deterioration in water quality is not acceptable under the Water Framework Directive. The sensitivity analysis suggests that watercourses within Buckinghamshire may be sensitive to increases in the discharge of treated wastewater. Further modelling [is needed]...”
 - Environmental constraints and opportunities – this is another opportunity to consider water resources and water quality issues, but from the specific perspective of avoiding impacts to designated sites (SSSIs, SACs, SPAs). A key point to note is that, whilst housing growth in a number of catchments nationally is heavily constrained on account of water quality (nitrates and/or phosphates) or water resources (i.e. groundwater levels) affecting internationally designated sites this is not an issue affecting Buckinghamshire. Nonetheless, there are sensitivities, such that the WCS concludes: *“The potential impact of development on a number of protected sites such as SAC and SSSIs within, or downstream of the study area should be carefully considered in future plan making.”* The WCS also advocates for high quality Sustainable Drainage Systems (SuDS) and natural flood risk management.
- 6.2.77. In summary, water resource and water quality issues are unlikely to serve as a significant factor with a bearing on the distribution of housing growth within the sub-region, but there is a need for ongoing work in collaboration with the Environment Agency, Natural England and the Water Companies.

Conclusion

- 6.2.78. In conclusion, under the great majority of sustainability topic headings there is no strong case to be made, at this stage, for setting a housing requirement that departs from LHN. As such, and also with a view to efficient plan-making, attention might reasonably focus on what is essentially the default option of setting the housing requirement *at LHN*.
- 6.2.79. In particular, it is difficult to foresee a strong case being made for setting the housing requirement *below* LHN. There are high level 'landscape' arguments, but there will be much opportunity to direct growth in such a way that landscape impacts are minimised, plus impacts can be mitigated through good practice masterplanning and urban design. Also, there is a need to recognise that any unmet need from Buckinghamshire would, in theory, need to be provided for in one or more neighbouring local authority areas also subject to landscape constraint.
- 6.2.80. Furthermore, there are significant and wide-ranging drawbacks to setting the housing requirement below LHN and, in turn, exporting unmet housing need. First and foremost, there are clear transport and, in turn, climate change mitigation drawbacks. Secondly, there would be implications for local and larger-than-local economic growth objectives and/or ensuring good spatial alignment between homes and jobs growth. Thirdly, development viability is generally strong in Buckinghamshire, which is supportive of ambitions to deliver net zero carbon developments to an exacting standard.
- 6.2.81. In this light, there is an argument for ruling out the option of setting the housing requirement below LHN now, despite the early stage in the local plan-making process.
- 6.2.82. However, there is also a clear counter argument, which relates to the lack of supply options that have been identified as reasonably in contention through the work undertaken by officers to date, as discussed in Section 5. The appraisal above is deliberately high level and does not factor in this work, in recognition of the fact that much further detailed work to explore supply options will occur through and subsequent to the current consultation (as discussed in Section 5). However, the current lack of identified supply is concerning, in the context of pressure to set the housing requirement at LHN. As already stated in Section 5, the current situation for Buckinghamshire is in contrast to the typical situation, which is one whereby reasonable supply options have a total capacity well in excess of what is needed/required, such that the local plan-making process can then explore different options / combinations of options ('scenarios') in order to explore varying implications for sustainable development objectives."
- 6.2.83. With regards to the option of setting the housing requirements *above* LHN, it is recommended that this option should *not* be ruled out ahead of further detailed work having been completed in respect of growth ambitions / opportunities, affordable housing needs and unmet need arising from neighbouring local authorities.
- 6.2.84. As such, and in summary, there is a clear case for a primary focus on growth scenarios that would involve setting the housing requirement at LHN, whilst also not being close-minded to higher growth scenarios.
- 6.2.85. Taking this approach should support efficient and effective plan-making, recognising that there is a pragmatic need to focus attention on a narrow range of housing quanta options – and ideally a single preferred option – as far as possible. Specifically, a clear focus in respect of housing quanta will support detailed and effective work to explore options / scenarios in respect of the *distribution* of growth, i.e. 'broad spatial strategy'.

6.3. Broad spatial strategy

Introduction

- 6.3.1. Section 5 introduces eight reasonable broad spatial strategy alternatives. However, at this stage it is considered reasonable to remove the option of an increased emphasis on brownfield supply because it is not clear that there is a strategic choice to be made or (or, at least, not a choice that is of equivalent significance to the choices that exist in respect of greenfield strategy/supply). Box 6.2 explores this matter further.
- 6.3.2. This leaves seven broad spatial strategy alternatives for appraisal
- 1) The emerging direction of travel
 - 2) Added emphasis on main towns
 - 3) Added emphasis on transport hubs
 - 4) Added emphasis on settlements near key employment areas
 - 5) Added emphasis on settlements at the edge of Bucks
 - 6) Added emphasis on other settlements
 - 7) Added emphasis on new settlements.
- 6.3.3. With regards to methodology, on balance it is considered appropriate to present a formal appraisal of the alternatives under the SA framework, i.e. an appraisal that aims to reach conclusions on significant effects. However, it is important to reiterate that reaching accurate and ultimately meaningful conclusions on significant effects is inherently difficult because of the high-level nature of the alternatives.
- 6.3.4. The appraisal is presented below across a series of sections where each gives stand-alone consideration to one element of the SA framework, and then a final section presents a summary appraisal in the form of an appraisal 'matrix'. Under each sustainability topic the aim is to: **1)** rank the RAs in order of performance (with a star indicating best performing); and then **2)** categorise the performance in terms of 'significant effects' using red / amber / light green / green:
- **Red** indicates a significant negative effect
 - **Amber** indicates a negative effect of limited or uncertain significance
 - **Light green** indicates a positive effect of limited or uncertain significance
 - **Green** indicates a significant positive effect
 - **No colour** indicates a neutral effect
- 6.3.5. Finally, it is important to reiterate that the appraisal is undertaken with minimal assumptions made regarding specific growth locations, i.e. the only detail behind Option 1 (Direction of travel) is that presented above in Table 5.1, and Options 2 to 7 are appraised with no assumptions about where specifically would see higher/lower growth.

Box 6.2: Ruling out the option of a significant boost to brownfield supply

Boosting brownfield supply would likely involve a focus on boosting development densities, as opposed to allocating additional sites, and there are few if any locations in Buckinghamshire where significantly boosting density at brownfield allocations is an option.

Moving forward, options to boost densities at brownfield sites can continue to be explored, including as part of town centre regeneration, but there is little value to be added by exploring options of this nature here alongside other broad spatial strategy options. That is because decision-making regarding development densities at brownfield sites involves factor in a range of technical workstreams including in respect of detailed design matters and viability.

With regards to new allocations, it will be for the Housing and Economic Land Availability Assessment (HELAA) to determine which sites reach the threshold of being 'available' in that that there is sufficient confidence that the site will come forward for development in the plan period. This can be quite a complex undertaking where the land is currently in a commercially viable use and recognising the costs involved with seeking planning permission.

In theory it can be that there is a strategic choice regarding the degree to which a local plan supports the release of employment land for housing (potentially to include rural employment sites and even isolated sites not adjacent to a settlement); however, in practice, it is not clear that this is a significant choice in the context of the Buckinghamshire Local Plan, including because high employment land needs dictate a broad strategy of protecting existing sites.

As part of any further work that seeks to identify additional brownfield supply, it will be important to recognise that brownfield sites can be associated with viability challenges and delivery risks, given existing use values, existing leases, fragmented land ownership and abnormal construction costs. A lack of delivery certainty is problematic because the Council must deliver on its committed housing requirement year-on-year over the plan period, plus delivery certainty is important for infrastructure planning. Where there are viability challenges there can be a tendency for applicants to argue for: a low proportion of affordable housing (or even no affordable housing); limited financial contribution to infrastructure delivery; comprises on wider policy objectives; and/or densities above what would otherwise be appropriate.

Other issues can include:

- Whilst town centres are highly accessible locations there can be issues around delivering new and upgraded community infrastructure alongside housing, e.g. new schools capacity.
- Redevelopment of employment land for housing can conflict with place-making and wider objectives. Similarly, a brownfield focus can limit potential for homes with gardens.
- There is a need to caution against new homes on brownfield sites that have historically been seen as appropriate for industry, retail or car-parking due to flood risk, particularly given climate change (although urban flood risk can often be mitigated).
- Town centres and wider areas of historic built form are often subject historic environment constraint, including accounting for Victorian and early 20th Century historic character.
- Town centre / urban / brownfield sites can be associated with challenges from a transport perspective. The Transport Baseline Study (2024) recognises that there are inherent benefits to focusing growth in urban areas, but also flags a number of concerns, including: A) a careful balance of housing, employment and other services is needed; otherwise out commuting and long travel distances will remain an issue; B) retrofitting transport links can require significant investment which may not be readily available, and works may be technically challenging / disruptive; and C) old market towns may not have the space to allow access and connectivity improvements (active travel, bus priority etc.)
- Reusing existing buildings (or at least their core components) ahead of demolition is a key means of built environment decarbonisation, with an increasingly high proportion of built environment emissions nationally those 'embodied' in construction materials as well as emissions associated with the construction / demolition. Also, there can be a heat network opportunity in town centres, but engineering challenges/costs tend to be prohibitive.
- Climate change adaptation can also be a concern, with a need to carefully plan for high temperatures / heat waves as well as urban drainage.

Having discussed these issues, it is important to state that practice is evolving nationally, in respect of taking a strategic approach to maximising brownfield housing supply. In this respect, the Chesham Neighbourhood Plan is of note for having recently explored the use of Design Codes and also having considered the use of Neighbourhood Development Orders (NDOs), which aim to de-risk the process of committing to challenging site allocations. The Buckingham Neighbourhood Plan is another recent example a plan that has taken a fine-grained approach to exploring urban brownfield supply opportunities. Exploring options in this level of detail could naturally be beyond the scope of what can be achieved through the Local Plan for Buckinghamshire, hence delegating the task of allocating urban sites could be an option to explore (although the potential to delegate the task to neighbourhood plans is now reduced on account of a recent national announcement regarding reduced funding support).

Accessibility

N.B. within the table below, and within all subsequent tables, there is a column for each of the alternatives introduced above at para 6.3.2. The table then aims to appraise the alternatives in terms of order of preference (number) and significant effects (shading).

Direction of travel	Main towns	Transport hubs	Employment areas	Edge of Bucks	Other settlements	New settlements
		2	3	2	2	2

6.3.6. The focus here is supporting access to community infrastructure, for example a secondary school (with capacity). This is often a key issue for local plans.

6.3.7. 'Accessibility' objectives lend support for:

- growth at scale;
- directing growth to higher order settlements and particularly to locations where new community infrastructure delivered would benefit not only the new community but also the existing community (i.e. serve to address an existing need); and
- directing growth in line with an understanding of development costs/viability.

6.3.8. Also, growth in support of rural accessibility and avoiding / addressing rural isolation can represent an opportunity, with even modest growth at a village having the potential to assist with maintaining and enhancing village services/facilities, retail and bus services. There are increasingly issues nationally in respect of maintaining school rolls at rural primary schools, and further work can be undertaken to explore this issue locally.

6.3.9. Overall, there is tentative support for the direction of travel strategy/supply, including because there is a clear willingness to target growth strategically, which can help to ensure that community infrastructure issues are avoided and opportunities realised.

6.3.10. It could also be that an additional emphasis on Buckinghamshire's main towns would be in line with 'accessibility' objectives, but there is much uncertainty ahead of knowing town-specific infrastructure issues/opportunities and the potential for these to be addressed through strategic growth. One point to note is that Buckingham is a main town where strategic growth options have recently explored as part of the process of preparing the Buckingham Neighbourhood Plan, including with a key focus on community infrastructure issues/opportunities, as discussed within the SA Report [here](#).

6.3.11. An increased emphasis on settlements well linked to an existing employment areas is tentatively flagged as performing least well, as it could feasibly be the case that there is pressure to direct growth to locations that perform less well in accessibility terms.

Air quality

Direction of travel	Main towns	Transport hubs	Employment areas	Edge of Bucks	Other settlements	New settlements
	2			2	2	

6.3.12. This is not likely to be an issue with a major bearing on the broad distribution of growth, as there is typically the potential to avoid/minimise impacts (also realise opportunities, e.g. to reduce traffic through a town centre) via detailed spatial strategy and site selection (also masterplanning and urban design).

- 6.3.13. However, directing growth with a focus on supporting transport objectives will clearly also tend to support air quality objectives (given a focus on ‘vision-led’ transport strategy), plus there is a need to recognise that issues are primarily focused in the south of the County (and surrounding areas in the south) and within the main urban areas.
- 6.3.14. There is an argument for ranking ‘other settlements’ as the worst performing option, given likely high levels of car trip generation. However, car trips would be relatively dispersed (albeit trips would still concentrate along key corridors and at higher order settlements) and rural areas clearly have relatively good air quality.

Biodiversity

Direction of travel	Main towns	Transport hubs	Employment areas	Edge of Bucks	Other settlements	New settlements
2	2	2	2	3	2	 1

- 6.3.15. There is now a legal requirement under the Environment Act to deliver biodiversity net gain (BNG) as part of development using a nationally prescribed metric. The BNG regime has its limitations, but it can and will be effective if implemented under a strategic spatial framework (as opposed to simply seeking site level BNG in a piecemeal way at the planning application stage). Local Nature Recovery Strategies (LNRs), which are also a requirement under the Environment Act, will play a key role.
- 6.3.16. In this light, there is a need to take a positive view, in respect of the potential to deliver on Local Housing Need (LHN) alongside biodiversity objectives. This positive approach is also reflected in a [letter](#) sent by the Secretary of State for Housing, Communities and Local Government to all nature conservation organisations on 20th July 2024.
- 6.3.17. With regards to differentiating between the scenarios:
- Growth at scale can lead to a particular opportunity, particularly when carefully targeted spatially, e.g. to locations close to, but not too close to, areas of value/sensitivity. The effect can be to support enhancements to the area of sensitivity/value, for example a river corridor, whilst avoiding negative impacts.
 - Land on the edge of Slough is quite notably constrained in biodiversity terms, including because of very close proximity to Burnham Beeches SAC (although strategic scale growth would give rise to good potential for effective mitigation, including Suitable Alternative Natural Greenspace, SANG). Also, there are biodiversity constraints to growth at the edge of Milton Keynes including Whaddon Chase (first and foremost), the River Ouzel / Grand Union Canal corridor and the Greensand Ridge.
- 6.3.18. Another consideration is a broad strategic constraint affecting the eastern part of Buckinghamshire, namely recreational pressure on the Ashridge Commons and Woods component of the Chilterns Beechwoods SAC, which is located in Dacorum. However, it is difficult to suggest implications for the current appraisal. Also, Dacorum adopted a mitigation strategy in 2022 and then submitted a Local Plan with a strong focus on delivering Suitable Alternative Natural Greenspace (SANG) in line with the strategy (and Buckinghamshire Council’s [Cabinet](#) agreed a Mitigation Strategy in July 2024).
- 6.3.19. Finally, with regards to broad distribution, it is important to note that the southern part of the County is associated with sensitivity over-and-above the north, such that there is a biodiversity case for directing/weighting growth away from the south notwithstanding biodiversity net gain requirements and potential strategic growth-related opportunities. This arguably serves as a high-level argument against expansion of main towns (although, on the other hand, there are no nationally designated sites in close proximity to Chesham, Amersham or Chalfont St Peter / Gerrards Cross).

Climate change adaptation

Direction of travel	Main towns	Transport hubs	Employment areas	Edge of Bucks	Other settlements	New settlements
2	3	3	2	2	2	

6.3.20. A primary consideration is flood risk. However, there is limited potential to meaningfully differentiate between the current high-level alternatives, as none would preclude or create challenges in respect of taking a sequential approach to avoiding flood risk.

6.3.21. The appraisal tentatively reflects a view that:

- Growth at scale can lead to opportunities for strategic flood water attenuation when carefully located (e.g. close to river corridors upstream of areas at risk).
- Transport corridors have a strong tendency to follow river valleys.
- Flood risk is an issue around the edge of certain main towns including Aylesbury.

6.3.22. Final considerations are:

- Streams in the far south of the County (on the edge of Bucks) pass through urban areas on route to the Thames. This is suggestive of a constraint but also an opportunity in terms of strategic planning for green / blue infrastructure.
- Numerous other potential growth locations can also be identified where an increase in surface water flows could feasibly worsen downstream flood risk affecting settlements outside of Buckinghamshire, e.g. Marlow and Bourne End (Maidenhead); Gerrards Cross and Denham (Uxbridge) and Aylesbury (Thame). However, it is very difficult to assume any risk in practice, given requirements in respect of Sustainable Drainage Systems (SuDS) and, beyond this, expectations around high quality SuDS at strategic growth locations. Indeed, strategic growth locations can deliver a betterment on the baseline, i.e. storage of water leading to reduced downstream flood risk. It will be important to ensure that proportionate work is undertaken to flag any key opportunities for delivering strategic flood risk benefits alongside wider 'ecosystem service' benefits.
- The chalk geology of the southern part of the County leads to relatively limited fluvial flood risk, although surface water flood risk (along dry valleys) and groundwater flood risk are issues. Chesham and High Wycombe are particularly of note, given steep sided dry valleys that gives rise to surface water flooding. Areas affected by groundwater flooding include Amersham, Chesham, the Chalfonts and Monks Risborough, and there have been significant issues over recent years. Groundwater flooding also occurs where there is a Thames gravel geology, such as at Marlow.
- Sewer flooding is the final source of flood risk discussed within the Strategic Flood Risk Assessment (SFRA), and one issue can be high groundwater infiltrating sewers and, in turn, impacting sewer capacity. However, it is difficult to suggest that this is a significant factor with a bearing on the current appraisal.

Climate change mitigation

Direction of travel	Main towns	Transport hubs	Employment areas	Edge of Bucks	Other settlements	New settlements
?	?	?	?	?	?	?

- 6.3.23. This is a centrally important issue for local plans, and some would argue that it should be *the* central issue (alongside providing for identified development needs). A key principle that has already been introduced above is the need to focus on *per capita* rather than total greenhouse gas emissions, and a second principle is the need to recognise a distinction between emissions from the built environment versus transport (albeit there are overlaps, notably in respect of electricity transmission and storage).
- 6.3.24. Transport issues and opportunities are a focus of stand-alone consideration below; hence it is appropriate to focus here on built environment emissions. This is a less significant consideration for local plan-making than is the case for transport emissions, but there are nonetheless significant issues / opportunities explore.
- 6.3.25. When looking to differentiate between the scenarios, a key consideration is potential to support 'net zero carbon' developments (see Box 1, above), which will mean a considerable step change on practice to date. In turn, a key consideration is directing growth mindful of variable development viability between growth locations and options. As part of this, a benefit of strategic growth locations is achieving economies of scale, albeit they will also often require costly (and carbon intensive) major new infrastructure.
- 6.3.26. One other consideration can relate to capacity of the electricity grid – recognising that electrification of transport and heating is likely to be central to the national decarbonisation strategy. Minimising pressure on the grid is obviously a reason to support forms of development suited to achieving 'onsite net zero' (i.e. net zero without relying upon offsetting), albeit even such schemes will still draw heavily from the grid in winter months. Equally, it can also be a reason to direct growth to locations where there is capacity in the grid (as understood from the Renewable Energy Study, 2023; notably Aylesbury and Buckingham). Where growth must be directed to locations with grid constraints then there is a case for integrating large-scale battery storage (to minimise peaks in grid strain) which, in turn, suggests strategic growth locations.
- 6.3.27. Moving forward there will be a need for further consideration of the links between spatial strategy / site selection and built environment decarbonisation in the Bucks context.
- 6.3.28. With regards to the categorisation of effects, the point to make here is that national practice – in respect of directing growth strategically so as to realise built environment decarbonisation opportunities – is not well advanced. All too often built environment decarbonisation is not a major focus of spatial strategy / site selection, such that opportunities go missed, and over-reliance is placed on aspirational development management policy that risks not being fully implemented because of barriers and competing costs at the planning application stage. There is a clear need to be able to predict that the effect of the Local Plan will be to achieve a significant positive effect on the decarbonisation baseline or, in other words, ensure that the Local Plan will achieve decarbonisation 'outcomes' that align with national policy and also legal requirements under the Climate Change Act. However, at the current early stage in the process, and given an understanding of national practice, this cannot be predicted with any certainty.

Communities and health

Direction of travel	Main towns	Transport hubs	Employment areas	Edge of Bucks	Other settlements	New settlements
2	2	2	2	2	3	1★

6.3.29. The discussion under this heading is an opportunity to explore issues and opportunities beyond those that are a focus of discussion above, under the ‘accessibility’ heading.

6.3.30. There is limited potential to meaningfully differentiate between the growth scenarios, but points to explore further moving forward include:

- Growth at scale can, in theory, lead to a place-making opportunity (e.g. if delivered in line with garden community principles; see NPPF para 77). There is a widespread view that opportunities can often be missed in practice; however, on the other hand, practice in respect of ‘design coding’ is improving nationally.
- Strategic growth can be targeted so as to assist with addressing areas/pockets of relative deprivation (over-and-above delivering new community infrastructure), including by delivering new employment and green / blue infrastructure.
- Growth aimed at minimising traffic congestion (e.g. ‘transit-oriented development’) can serve to minimise traffic congestion, which is often a key issue for communities.
- New settlements can tend to be favoured by existing communities.
- Growth at villages can tend to face local opposition and it can also be said that a strategic approach to growth in former Chiltern and South Bucks districts can be anticipated to face local opposition given the time since the last local plans here.

Economy

Direction of travel	Main towns	Transport hubs	Employment areas	Edge of Bucks	Other settlements	New settlements
2	3	2	1★	2	4	3

6.3.31. The housing growth strategy has a range of important implications for objectives relating to the local and larger-than-local economy. Key considerations include:

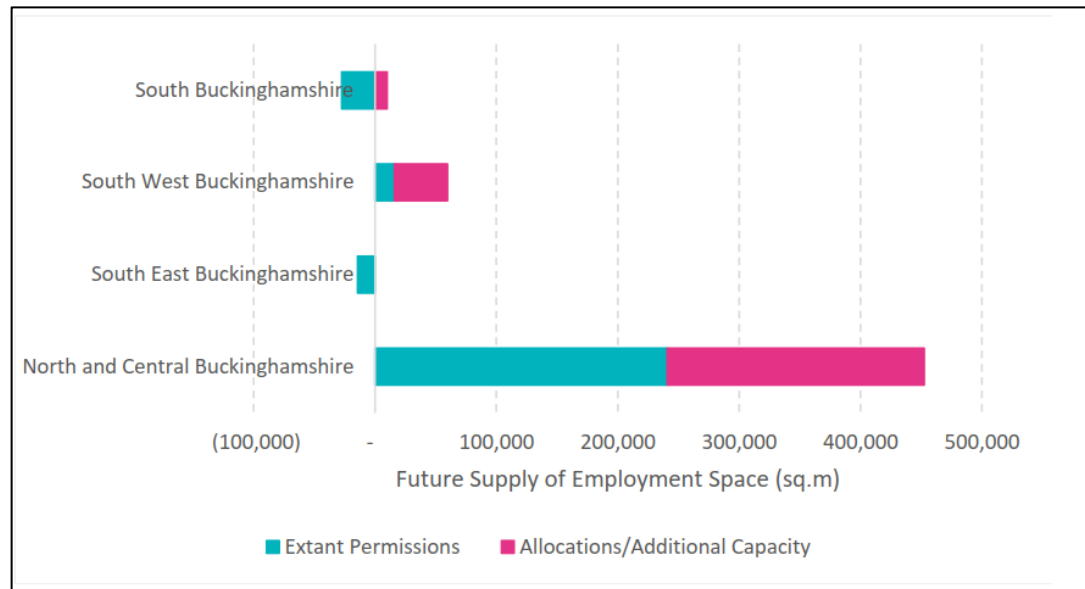
- Aligning new homes with jobs / jobs growth, recognising the importance of ensuring that key employment sectors have access to a suitably skilled workforce.
- Realising opportunities to deliver new employment land alongside new homes as part of mixed-use schemes, for example mixed use schemes at Aylesbury are allocated by the adopted Vale of Aylesbury Local Plan (VALP).
- Directing new homes in order to deliver or support delivery of infrastructure upgrades that, in turn, support economic activity.
- Avoiding the undue loss of employment land to deliver new homes, notwithstanding the importance of making best use of previously developed land.

6.3.32. An important starting point is Figure 6.1, which shows the spatial distribution of the current pipeline of future supply, and shows a very clear spatial concentration in the north of Buckinghamshire. Furthermore, there is the potential for an additional ~50 ha at Westcott beyond 2040 (which could feasibly be facilitated by housing alongside).

6.3.33. The figure is from the Employment and Retail Study (2025), which also explains:

“It is estimated that 70% of the emerging supply effectively comprises out of town centre employment sites, mostly attributed to enterprise zones. The remaining 30% of the supply is emerging in town centres and this is mostly concentrated around Aylesbury and High Wycombe towns.”

Figure 6.1: The pipeline of future employment space to 2040 (Lichfields, 2025)



6.3.34. With regards to policy implications, the Study recommends [emphasis added]:

*“Consider the spatial distribution of employment supply to support the overall sustainability of future growth. Most emerging supply is located within North and Central Buckinghamshire and in business parks/estates. In this context, there is a need to consider how locally-generated employment **needs outside of North and Central Buckinghamshire** can be most effectively provided for... This could include making new land allocations, protecting and making best use of existing employment areas and promoting their renewal and upgrading. In addition, this could also be aligned with the Council’s regeneration plans for... main centres.”*

6.3.35. What does this mean for the current appraisal? In short, it is difficult to draw strong conclusions. It could suggest a need to consider mixed use strategic growth locations in the south of Buckinghamshire, which would likely not take the form of a new settlement (on the assumption that new settlement options will be limited in this area due to the environmental constraints). However, on the other hand, there is the potential to target new employment land without commensurate housing growth.

6.3.36. Final broad spatial considerations relevant to the current appraisal are as follows:

- A broad distribution strategy that directs new homes to strategic transport corridors and/or to locations well-connected to economic hubs is clearly strongly supported, including recalling the sub-regional context, e.g. given links to Oxford, Milton Keynes and Slough, which are nationally significant economic hubs. For example, a focus of new homes along East West Rail could support national growth ambitions discussed [here](#) (albeit this would mean a focus of growth at Winslow, where there are constraints to growth, given limited if any potential for further East West Rail stations in Bucks).
- New settlements can be directed to locations well-connected to employment hubs, and new settlements can also deliver targeted new strategic employment land. Westcott is an opportunity, with the potential to deliver strategic employment onsite and also support growth at nearby Aylesbury and Bicester (albeit Westcott is a rural location). However, a focus on new settlements could also lead to pressure to direct growth to less well-connected locations where the opportunities arise, e.g. former airfields.
- A focus of growth at the Edge of Bucks could well align with economic objectives, particularly assuming a focus at Milton Keynes and Slough (also potentially Brackley).

Historic environment

Direction of travel	Main towns	Transport hubs	Employment areas	Edge of Bucks	Other settlements	New settlements
2	2	2	2	2	2	1

- 6.3.37. Historic environment / heritage constraint and opportunity is a highly relevant strategic consideration and will be a key factor when exploring reasonable growth scenarios ahead of preparing a draft plan. However, it is difficult to meaningfully differentiate between the current high-level broad distribution scenarios. Considerations include:
- New settlements can serve to minimise pressure on historic settlements but can impact on historic landscapes and associated characteristic settlement pattern.
 - Transport corridors are often associated with historic settlement(s).
 - Some villages have expanded little beyond their historic core (also indicative of limited housing growth) or can otherwise be sensitive to growth in historic environment terms.
 - Larger settlements will already have expanded beyond their historic core, but the risk can be expansion beyond their historic / characteristic position within the landscape (often a river valley), as well as encroachment towards assets historically associated with a rural landscape setting, notably stately homes / estates with an extensive landscape setting, but also historic farmsteads and hamlets.
 - There is significant historic environment constraint around the edge of Slough including a series of Registered Parks and Gardens (albeit of varying sensitivity).
 - Whilst there is a higher density of listed buildings in the south of the County, many key assets in the north are associated with an expansive landscape setting.
- 6.3.38. Overall, whilst there are major benefits to plan-led growth from a historic environment perspective, as opposed to ongoing piecemeal growth with relatively limited strategic coordination under the presumption in favour of sustainable development, the scale of growth set to be delivered through the Local Plan for Buckinghamshire will undoubtedly lead to major challenges in terms of avoiding historic environment constraints and also ensuring that impacts are mitigated through detailed site-specific policies. Historic England scrutinises proposed allocations in detail and often expects extensive work to prepare site-specific Historic Impact Assessments, which will be a major exercise given a likely need for allocations to deliver in the region of 60,000 homes.
- 6.3.39. To end, the following bullet points consider select potential issues/impacts:
- South of Buckinghamshire outside the National Landscape – land to the north of Slough has already been discussed, but elsewhere in the South of Buckinghamshire outside of the National Landscape the potential for significant growth can be envisaged given good transport connectivity and links to key employment areas and also accounting for forthcoming designation of grey belt. Moving forward, there could be value in considering growth options across a broader canvass comprising the sector of land between Chalfont St Giles, Beaconsfield and Chalfont St Peter / Gerrards Cross, accounting for factors including road and rail connectivity and constraints in terms of landscape, biodiversity and the historic environment, including a need to minimise traffic through highly valued historic villages and along historic rural lanes.
 - Haddenham, Winslow and Princes Risborough – could well see further strategic growth given relatively good transport connectivity, but all are historic villages with highly valued conservation areas (perhaps most notably Haddenham).
 - Waddesdon – is a village that warrants being highlighted given the possibility of strategic growth on account of relatively good transport links, namely a location on the A41 between Aylesbury and Bicester/Westcott. The village itself has limited historic environment constraint, but Waddesdon Manor is a Grade I Registered Park/Garden.

Homes

Direction of travel	Main towns	Transport hubs	Employment areas	Edge of Bucks	Other settlements	New settlements
★ 1	★ 1	2	2	★ 1	★ 1	3

- 6.3.40. A key consideration here is delivering a good mix of housing in terms of size / type of site and geographical location. In this light, there is a clear argument for delivering new housing broadly in-line with the settlement hierarchy, also recognising that individual settlements will be associated with a housing need that correlates with size. Locally arising housing needs will also be a factor of recent housing growth and this is a strong reason for exploring growth options in those areas that have seen limited recent growth.
- 6.3.41. Other key factors are: A) directing growth to locations/sites with strong development viability credentials with a view to delivering on affordable housing objectives alongside wider policy objectives with cost/viability implications; B) directing a good proportion of growth to sites with low delivery risk and which can deliver earlier in the plan period,¹⁵ thereby avoiding the need to argue for a stepped housing requirement, i.e. one whereby local housing needs are not provided for in full in the early years of the plan period; and C) Slough is associated with potentially significant unmet and, in turn, there could be a need to explore options involving provision for unmet need in Buckinghamshire.¹⁶
- 6.3.42. Overall, early indications are that there is a strong strategic commitment to providing for Local Housing Need (LHN) in full, but there does remain an element of uncertainty regarding whether this can be achieved (including without having to resort to a stepped housing requirement) given limited supply options, as discussed in Sections 5 and 6.2.
- 6.3.43. With regards to the possibility of an increased emphasis on transport hubs and/or key employment areas, in theory this could mean departing from the settlement hierarchy such that there is a tension with 'homes' objectives; however, in practice, the effect could be that there is an increased emphasis on growth in the south of Buckinghamshire, where need for housing including affordable housing is particularly high.
- 6.3.44. Finally, with regards to the possibility of an increased emphasis on new settlements, there is a need for considerable caution on account of lead in times and delivery risks (also potentially viability challenges once account is taken of infrastructure costs).

Landscape

Direction of travel	Main towns	Transport hubs	Employment areas	Edge of Bucks	Other settlements	New settlements
2	2	2	2	★ 1	2	★ 1

- 6.3.45. Landscape is a significant constraint to growth, even assuming low growth within the Chilterns National Landscape (NL), as discussed in Box 6.3. Whilst the north of the County is overall less sensitive in landscape terms, at all or most of the larger settlements there is a risk of problematic 'sprawl' and/or concerns around impacts to characteristic expansive landscapes with long distance views of higher ground.

¹⁵ An important aspect of minimising delivery risk and supporting early delivery is accounting for land ownership challenges, i.e. recognising that where there are multiple landowners there can be challenges around collaboration and land 'equalisation'.

¹⁶ Clearly there would be a process to go through, including work by Slough Borough Council to demonstrate that supply is being maximised within the Borough. Should there be an unmet need, there would then be a need for work to explore a range of potential solutions / growth locations outside of the Borough, albeit such work is inherently challenging.

- 6.3.46. As a further introductory point, it is important to note that larger settlements across Buckinghamshire (not only towns but also large villages) are highly variable in terms of landscape sensitivity, and there will be a need for further work to understand this variability (also variability of landscape areas surrounding any given settlement). As part of this, there may be a need to question whether 20th and early 21st century expansion of settlements has led to 'landscape capacity' being reached, such that further significant growth would risk capacity being breached and potentially sprawl. For example, and notably, there is a need to consider the historic association of a number of settlements with a specific river valley and/or historic transport corridor, also mindful of historic landscape features such as commons, hanger woodlands and stately homes and associated parkland. Landscape capacity is not something that can be defined with any precision but is a concept that can be used when discussing the relative capacity of settlements to expand, or when comparing and contrasting broad expansion options.

Box 6.3: Growth strategy in the Chilterns National Landscape

An important broad strategic question is in respect of what scale of site allocation(s) and what scale of overall growth is appropriate for villages in the Chilterns NL. On the one hand, modest sized sites and modest overall growth might be seen as minimising the risk of impacts to the NL, including recognising that a new duty to “seek to further” the purposes of NLs (discussed below). However, on the other hand, there is a need to support the ‘right’ sized sites that are able to deliver maximum benefits (‘planning gain’) for any village, and some villages may be associated with a need for growth (as discussed).

There is currently debate nationally regarding how to interpret paragraph 190 of the NPPF, which seeks to avoid “major” developments in NLs, and an important legal case is Campaign for the Protection Of Rural England, Kent Branch, R (On the Application Of) v Secretary Of State For Housing Communities And Local Government [2025] EWHC 1781 (Admin)

The judgement of 20th June 2025 focused on the interpretation of section 85(A1) of the Countryside Act 2000, as strengthened by the Levelling Up and Regeneration Act 2023. This imposes “a general duty” on relevant authorities in relation to land in a NL. Specifically, relevant authorities now have to “seek to further” the statutory purposes of NLs, as opposed to the previous legal duty to merely “have regard to” such purposes.

CPRE Kent argued that planning permission must be refused “for any development of land which is found to be in any way harmful to the natural beauty of a protected landscape, however limited and temporary that residual harm...”

However, the judge could not accept “that the qualified language of section 85(A1) of the 2000 Act, even in its strengthened terms, can be construed in such a way as to have that effect”. He stated: “The qualified duty... is simply incapable of being read in that way. Nor is it possible to discern in the qualified terms in which the section 85(A1) duty is expressed, a legislative intention to displace the essentially evaluative basis for determination of planning applications... in the way in which the claimant contends.” The judge added that the “socio-economic consequences of the claimant’s approach... would be truly remarkable” and that “... the current statutory arrangements... which leave the planning authority with the function of evaluating the planning balance... would be reduced to a single determining factor...”

The case was the second legal action considered by Justice Mould in relation to 85(A1) of the 2000 act in the month of June 2025.

- 6.3.47. In light of these points, it is appropriate to conclude a case for new settlements, but clearly it is difficult to draw this conclusion with any certainty without knowing specific locations. It is also considered appropriate to flag a degree of support for growth directed to the edge of Bucks, particularly noting that there is some relative landscape capacity in the far southeast of the County (not influenced by the Chilterns and with extensive potential to draw upon infrastructure and woodlands for containment), but also noting that there is some capacity at edge of Milton Keynes (drawing upon topography, albeit the potential to do so is variable) and also noting that HS2 east of Brackley potentially suggests an opportunity for growth in landscape terms (but this would involve expanding the town beyond the A43 and risk encroaching on the Great Ouse Valley).

6.3.48. To end, the following bullet points consider select potential issues/impacts:

- Aylesbury – a potential direction for strategic growth is to the north where there are sensitivities including relating to the expansive landscape of the River Thames valley. To the south of Aylesbury it can then be anticipated that Stoke Mandeville will come into consideration for further strategic growth, given very good transport and accessibility credentials, but a very significant consideration here is the risk of impacts to views from the Chilterns escarpment including from the Ridgeway National Trail.
- Buckingham – sub-optimal piecemeal growth has been a significant issue over recent years, such that there is a desire to take a strategic approach to growth with a long-term perspective. A key focus is securing infrastructure benefits but there is also a need to ensure a landscape led approach to growth, recognising that the town has already expanded beyond the Great Ouse Valley to that of the Padbury Brook.
- High Wycombe – is heavily constrained by the Chilterns National Landscape (NL) and the built form already strongly reflects the topography in that the town has expanded along valleys and ridges. There is land outside of the NL at Holmer Green and at Loudwater / Woodburn Green (and then the closely linked settlements of Wooburn and Bourne End) but the latter area is notably sensitive in landscape terms including given the River Wye corridor (with steep topography and noting its confluence with the Thames at Bourne End) and also noting the settlement gap to Beaconsfield.
- Chesham – land to the east falls outside of the Chilterns NL but this is nonetheless raised ground with close links to the Chilterns. It is important to recognise Chesham's unique association with the Chess valley and a series of dry valleys.
- Chalfont St Peter and Gerrards Cross – there has already been a discussion above regarding the importance of giving strategic consideration to land to the west and northwest of Chalfont St Peter and Gerrards Cross. With regards to land to the east, any strategic growth would need to be carefully considered from a landscape perspective because, whilst the M25 could be drawn upon for containment to some extent, further north there would be a concern regarding encroachment towards Chalfont St Giles and/or the NL (although this is the Chilterns dip slope and the edge of the NL is marked by Newlands Park, which whilst an important heritage asset is currently a focus of housing development) and/or a concern around containing Chalfont St Peter within the Misbourne Valley (with the Colne Valley to the east).
- Amersham and Little Chalfont – must come into consideration for growth on account of good transport connectivity, but the Chilterns NL is a clear constraint. Little Chalfont is notable for limited historic environment constraint, and it is clear that growth in the remaining sector of land outside of the NL is an option (specifically, the remaining sector having accounted for a committed site for 350 homes to the southeast), but there are constraints given the adjacent NL (noting this is the Chess Valley; also noting a footpath network and a historic farmstead) and the gap to Amersham.
- Wendover – there is a sector of land north of the town that falls outside of the NL (and the London Green Belt), but there are clear constraints in the form of the NL setting.
- Marlow – was also assigned low growth through the Wycombe District Local Plan (2019) and has seen low growth over recent years/decades, such that there is a need to explore growth opportunities, also noting significant local employment and good links to High Wycombe. However, almost the entirety of the settlement edge is constrained by either the Chilterns National Landscape or the River Thames Corridor.
- Winslow, Haddenham and Princes Risborough – will come into contention for strategic growth given good train connectivity, but there are landscape challenges including relating to securing effective containment and in terms of impacts to long distance views from the Chilterns and/or across the Vale towards higher ground associated with the Chilterns or the Mid Vale Ridge. At Princes Risborough there is committed strategic growth such that further growth would require careful consideration. At Winslow the growth opportunity is significant given links to Milton Keynes and Oxford, but it is a challenge to determine an appropriate configuration of strategic growth that minimises the risk of unchecked sprawl over time.

Soils / resources

Direction of travel	Main towns	Transport hubs	Employment areas	Edge of Bucks	Other settlements	New settlements
=	=	=	=	=	=	=

- 6.3.49. There is also a theoretical argument against expanding larger settlements, as there are relatively few of these in the north of the County, which is associated with quite extensive areas of land shown to be of Grade 4 quality by the (low resolution, 'provisional') national agricultural land quality dataset, i.e. land that is very unlikely to be 'best and most versatile' in NPPF terms. Equally, it is important to note that the primary area of Grade 1 agricultural land in Buckinghamshire is located in the Slough area.
- 6.3.50. However, there is little certainty, as the data accurately recording agricultural land quality across the County (and around the edge of settlements in particular), is very patchy (see [Figure 10.2](#) in the Scoping Report; detailed data is primarily available for sites where there has been a planning application).
- 6.3.51. Another consideration is avoiding sterilisation of minerals resources that might be viably extracted, accounting for safeguarding areas within Buckinghamshire Minerals and Waste Local Plan. There is a higher concentration in the south of the County (most notably sand and gravel reserves); however, safeguarding areas are extensive, and, in turn, safeguarding is not always absolute. It is also notable that land at the southern extent of the County historically associated with gravel extraction is now associated with a high density of historic landfill sites, e.g. as shown [here](#). Extraction can occur prior to development, but this clearly takes a period of years, and this must be factored in.

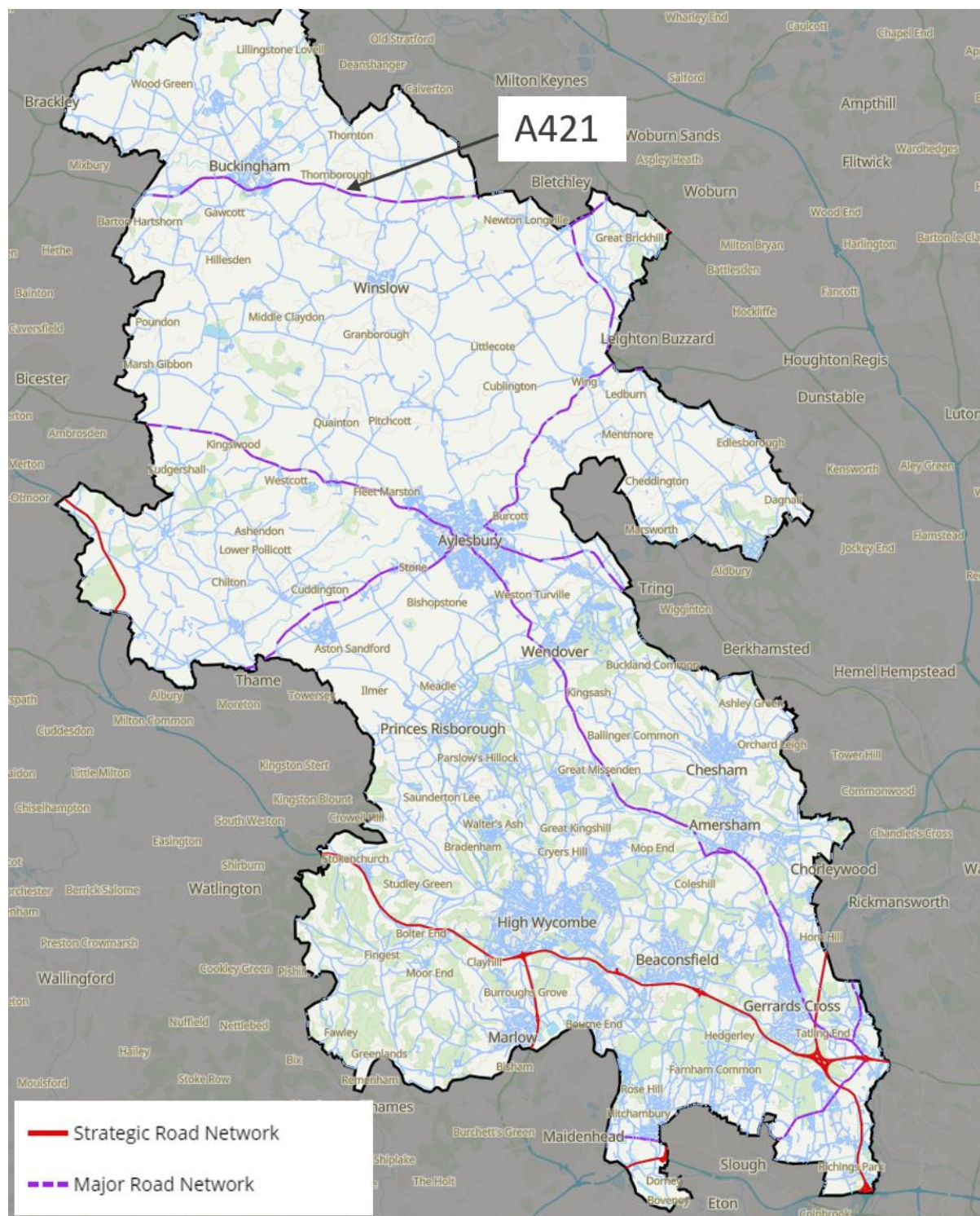
Transport

Direction of travel	Main towns	Transport hubs	Employment areas	Edge of Bucks	Other settlements	New settlements
2	2	1	3	2	4	3

- 6.3.52. The following are key messages from the Transport Impacts Assessment (2024):
- Traffic congestion is a particularly widespread issue in the south of the County, but there are also numerous traffic hotspot areas in the north of the County.
 - There is a clear case for focusing growth so as to realise rail travel / upgrade opportunities, including new stations (albeit highly challenging to deliver, with a need for early and close engagement with Network Rail).
 - There is a need to support jobs growth locally to reduce out-commuting (but also note that out commuting by rail has reduced over recent years, such that problematic overcrowding of trains has reduced as an issue).
 - There is a need to support public and active travel connections to train stations, which can be a reason to support strategic growth locations, which can deliver targeted upgrades, e.g. new high quality cycle routes.
 - Key strategic issues/opportunities are at Aylesbury ("Consider the best way to connect... developments on the east side of Aylesbury into the rail network") and High Wycombe ("Consider the preferred strategy for public transport connectivity into High Wycombe from the south [i.e. from Marlow / Maidenhead]").

- 6.3.53. With regards to the broad strategy alternatives, the first point to note is strong support for targeting growth along **transport hubs** and along strategic transport corridors, including with a view to supporting targeted investment in infrastructure and services.
- 6.3.54. Figure 6.2 is taken from the Local Plan Baseline Transport Study (2024) and serves to highlight the main road corridors that might be a focus of growth (in addition to locations in proximity to train station / potential train stations, as discussed below).

Figure 6.2: The strategic and major road network



- 6.3.55. The figure highlights the A421 corridor on the basis that it has been, and continues to be, a focus of detailed work to explore upgrade options, including committed and potential future growth at Milton Keynes and Buckingham, and also recognising its role linking Milton Keynes to the M40 corridor and to Oxford. The 2024 study concluded:
- “All available evidence has shown that there are notable issues and areas of concern regarding transportation for all modes on the A421 corridor. Notably, congestion and junction performance have an impact on journey times, and the availability and quality of both active travel and public transportation infrastructure is lacking... These issues are expected to be exacerbated by any future development growth and therefore service level improvements or policy measures that will mitigate and/or address these challenges will need to be a consideration in the location of future areas of growth and potential site allocations.”*
- 6.3.56. Also, an A421 Corridor Study (2025) was subsequently carried out to understand the current and future situation in the corridor further and to identify, assess and recommend a package of options to mitigate issues identified and realise opportunities. The study concludes that between 2019 and 2040, traffic is expected to increase between 10% and 48% depending on location and time of day. Delays between Buckingham and Milton Keynes are expected to increase which will also have a knock on effect on smaller junctions providing access/egress from local roads to the A421. The report recommends a package of 5 junction improvement proposals together with a wide range of different types of measures should be taken forward in order to improve performance and enable increased connectivity by all modes of travel on the corridor.
- 6.3.57. With regards to the other major road corridors shown in Figure 6.2, motorway junctions are clearly a key consideration, in that upgrades can be very challenging to deliver, with a need to align with National Highways’ long-term strategy.
- 6.3.58. Also, the A404 between Marlow and Handy Cross is managed by National Highways, and this is a challenging corridor, with the Baseline Transport Study explaining:
- “Buckinghamshire Council will continue to make the case for these improvements to be [funded by Government]. To support this work, a high-level economic business case for investment into improvements for the corridor to enable it to continue to support economic growth into the future is being developed.”*
- 6.3.59. With regards to the ‘major road network’ routes shown in Figure 6.2, one point to note is variation in terms of the extent to which historic settlements are effectively bypassed. For example, Waddesdon – located on the A41 corridor between Aylesbury and Bicester – does not benefit from a bypass and this is similarly the case for nearby Stone.
- 6.3.60. One other corridor of note is the A418 corridor east of Aylesbury, which passes through a notably rural landscape. In particular, it is notable for connecting Aylesbury to Dunstable and Luton (via Wing and Leighton Buzzard) and the Baseline Transport Study states: *“Proposals for a bus route/improved 61 bus service from Aylesbury - Dunstable - Luton have been submitted for consideration as part of the Luton [Airport expansion] DCO and agreement has been reached to ensure that tendering of any new bus contracts consider connections to Aylesbury.”*
- 6.3.61. Also, with regards to transport corridors and hubs, there is a need to note the area around Iver, which the Baseline Transport Study describes as: *“... nationally unique in being impacted upon by a number of simultaneous national infrastructure schemes including the expansion of Heathrow Airport, HS2, Western Rail Link to Heathrow (WRLtH), [the Elizabeth Line] and the M4 Smart Motorway Project.”*
- 6.3.62. Finally, with regards to main road corridors, there is a need to consider support for freight transport linked to warehousing (which is also a consideration for the rail network). This is a key ‘larger than local’ consideration for many local plans, and Buckinghamshire is no exception. This is a consideration for upgrades to the strategic/major road network, e.g. park/rest sites and low emission fuelling centres, but is also a consideration for strategic urban extensions, given the growing focus on ensuring “last mile solutions” which could include support for use of drones.

- 6.3.63. In summary, a transport focus has clear merit from a transport perspective. However, at the current time it is only possible to predict ‘limited or uncertain’ positive effects given that LTP5 is in preparation, plus work is ongoing at the regional and national scales that could serve to highlight strategic opportunities to be realised through the Local Plan.
- 6.3.64. With regards to **new settlements**, a key consideration is the need to ensure that they are well-located and well-integrated in transport terms, and it is anticipated that several options will be available for consideration that have a clear transport rationale. However, there can also be a tendency for settlement options such as airfields to be located in rural areas that are unsuitable or problematic in transport terms.
- 6.3.65. One known new settlement option is Westcott, and growth here might support objectives for improving public transport connectivity along the A41, in combination with growth at Bicester. Also, Calvert has been discussed in the past as a new settlement option, particularly because this is the point where a potential Aylesbury East West Rail (EWR) spur would meet the main EWR route (it is also the point where HS2 crosses EWR, but there is little or no reason to suggest a possible HS2 station). More generally, whilst Calvert is a very rural location, the site is near equidistant between Bicester, Buckingham, Winslow and Aylesbury. Finally, one other station in Buckinghamshire that feasibly comes into contention as a new settlement location is at Cheddington, but this is a rural area and the National Landscape setting is a major constraint.
- 6.3.66. Beyond new settlement locational considerations, a key challenge is delivering schemes of a sufficient scale such that there is a good degree of self-containment / trip internalisation (as opposed to ‘dormitory’ new settlements). Also, in practice, a challenge can relate to delivering transport-focused measures (and other infrastructure) alongside early phases of housing, given the costs involved. Furthermore, large-scale new settlements could be well-suited to innovative transport-orientated masterplanning.
- 6.3.67. Finally, with regards to new settlements, there is a need to recognise that options may primarily be located outside of the Chilterns NL and potentially primarily outside of the Green Belt, which means a degree of concentration in the north of Buckinghamshire, which is more rural (as discussed), albeit there are well-connected areas and potential strategic transport-related opportunities to explore.
- 6.3.68. With regards to the possibility of increased emphasis on **main towns** it is, of course, difficult to generalise regarding transport issues and opportunities. However, it is appropriate to highlight Aylesbury, where the Baseline Transport Study (2024) explains:
- Aylesbury has previously been identified as having some of the worst congestion in the country (measured in average vehicle speeds), ranking 6th out of 111 cities and large urban areas in the UK according to a 2018 scorecard.
 - The construction of High Speed 2 and East West Rail undoubtedly contributes to congestion around Aylesbury (and elsewhere).
 - Central to the Aylesbury Transport Strategy (ATS, 2016) is a series of link roads, forming an orbital bypass around the town, serving to link new communities to key destinations by car and also support sustainable transport objectives.
 - Several links are being delivered largely via VALP allocations and “delivery of the remaining Aylesbury link roads is “crucial” for the future of the town, and this is particularly the case if ‘East West Rail – Aylesbury Link’ is not delivered (as the ATS was predicated on its delivery).
- 6.3.69. Princess Risborough is also notable as a committed strategic growth location where new homes are coming forward alongside major new transport infrastructure; and Beaconsfield is another town where a relief road has recently been delivered, and it is important to note that there are growth options in close proximity to the train station, from where there is a very good service into London.
- 6.3.70. Focusing on Princess Risborough, the Baseline Transport Study (2024) explains:

“The long term vision of the Princes Risborough relief road is the creation of an alternative to the existing A4010 around the town, facilitating smoother journeys between High Wycombe and Aylesbury and removing the negative impact of through traffic on the existing A4010 alignment through the town centre. The scheme design includes new active travel infrastructure to support greater walking and cycling accessibility for the town, especially to Princes Risborough and Monks Risborough stations, and address severance issues across the railway line.”

6.3.71. The Baseline Transport Study is quite strongly supportive of strategic urban extensions at main towns, given the potential to align with strategic transport objectives including:

- Major new infrastructure – e.g. the EWR Spur and final link roads at Aylesbury.
- Targeted support for bus routes – the Study supports improvements to “key strategic routes which serve important destinations such as hospitals, schools, airports, leisure and tourist destinations”. It also notes that: *“Bus priority measures on arterial routes in Aylesbury and High Wycombe to improve punctuality and reliability.” In this regard, it should also be noted that the discussion of baseline traffic congestion concludes that “routes into Aylesbury and out of High Wycombe suffer the most delays.”*
- Targeted support for strategic walking and cycling routes – the Local Walking and Cycling Infrastructure Plans regime has led to a step-change in terms of strategic planning, and there are numerous existing, planning and potential initiatives across Buckinghamshire that could benefit from developer funding.
- Integrated / vision-led solutions aimed at ensuring high modal shift – the Study explains that in larger scale developments *“there may be opportunities for developers to provide ‘whole route’ sustainable transport solutions to encourage behaviour change and establish commercially viable schemes.”*
- Future mobility options – the Study discusses:
 - Demand responsive transport services – one recently launched in Aylesbury, aiming to provide a convenient and affordable travel option for residents in villages around Aylesbury to supplement existing public transport services.
 - Car clubs – *“developments need to be of a large scale [for the scheme to be viable] although smaller developments could be considered where it is possible to enable access to a wider audience e.g. housing development close to business locations...”*

Also, the Study explains: *“Despite support for car clubs in existing policies, there are currently no standards for their provision in Buckinghamshire. Targeted roll out of car club schemes across the county have also largely fallen behind largely due to the lack of dedicated funding, support programmes and policy guidance. Work has started to develop a countywide guidance for car clubs which will be aligned with existing policies and form part of the LTP5 and Local Plan evidence base.”*

- Micro-mobility – Buckinghamshire hosts three of the national e-scooter trials in Aylesbury, High Wycombe, Princes Risborough. The schemes are not without their issues, but as of January 2024, over 327,000 trips had been taken on e-scooters covering a total distance of just over 507,000 miles locally.
- Mobility hubs – are designed to host public transport alongside shared transport modes and active travel facilities, with the possibility of seamless switches and improved links between different layers of transport such as the core public transport network and shared services. They raise the profile and visibility of the range of shared and other sustainable travel modes, which provides a new status and appeal. A countywide guidance is in development which will form part of the LTP5 and Local Plan evidence base, with a view to facilitating the implementation of mobility hubs.

6.3.72. Finally, with regards to strategic urban extensions to a main settlement, there is a need to recognise that these are mostly concentrated in the south of Buckinghamshire, where there is problematic existing traffic congestion (see Figure 6.3) albeit this is also the part of Buckinghamshire that is comfortably best connected by rail and bus (Figure 6.4).

- 6.3.73. With regards to a strategy involving **dispersal** to rural areas, whilst concerns in respect of air pollution and greenhouse gas emissions are reducing (but by no means disappearing) on account of the ongoing national switchover to EVs (the trajectory of which remains somewhat uncertain), there are nonetheless clear arguments against any such strategy in terms of avoiding problematic traffic / congestion, including along unsuitable roads, through village centres and in town centres (as key destinations).
- 6.3.74. Also, a dispersal strategy equates to a less coordinated approach, such that it becomes more difficult to plan to avoid traffic congestion and to deliver new / upgraded infrastructure and improved public transport services.
- 6.3.75. With regards to the scenario that would involve an emphasis on supporting the growth of towns on the **edge of Buckinghamshire**, point to note include:

- There are aspirations for expansion of Milton Keynes to include a strong focus on new Mass Rapid Transit (MRT), e.g. see <https://www.mkfutures2050.com/>. Also committed urban extensions on the MK-edge within Buckinghamshire have a strong transport focus, namely Salden Park and Shenley Park. Both aim to support bus connectivity and link into the existing Milton Keynes Redways.
- Development located in the south of Buckinghamshire is likely to present transport challenges, given existing traffic congestion. However, it is important to note the potential for large scale housing growth in a location in relative proximity to a town centre and/or a train station with a very good service. Also, there are major employment opportunities nearby, notably Slough Trading Estate, Heathrow and Pinewood (where the Transport Baseline Study notes that development is delivering significant new sustainable transport infrastructure).

Furthermore, there is good access to strategic greenspace (e.g. Langley Park in very close proximity, and the Colne Valley Regional Park nearby), which is a transport consideration (although, on the other hand, valued greenspaces in this area are a significant constraint, most notably Burnham Beeches SAC).

Finally, around Slough it is worth highlighting transport distinctions between the primary areas that come into contention for growth (after having accounted for the Burnham Beeches SAC constraint) namely: A) West of Slough where there is good access to Taplow station but constraints including relating to landscape and the historic environment, including relating to the Thames Valley setting; B) Burnham where potential growth locations are more distant from a station and there is a risk of encroaching on a rural landscape without good road links; and C) the Langley area where there is potential for good access to Langley Station but a need to consider growth strategy with a long term perspective accounting for a wide range of issues including, amongst other things, grade 1 quality agricultural land.

- Leighton Buzzard – the A418 between Aylesbury and Leighton Buzzard is a single carriageway A-road that passes through an attractive rolling landscape, and it is difficult to see how it could be significantly upgraded in support of public transport. Also, the road passes along the edge of the historic core of Wing and passes Grade II* listed Ascott House registered park and garden. However, it could be appropriate to explore options, including noting links to Luton beyond.
 - Brackley / Silvestone area – large-scale growth in this area would necessitate close working with both Northamptonshire and Oxfordshire County Councils in respect of realising long term strategic transport objectives, e.g. in terms of improved linkages between the M1, M40 and A43 corridors. As part of this, there would be a need to account for ongoing work to explore options for upgraded the A421, which plays a key role linking the M1 and MK to Northamptonshire, the M40, Oxfordshire and the A43.
- 6.3.76. Finally with regards to the option of an increased emphasis on settlements well linked to a strategic **employment area**, it is important to note that whilst the area in the vicinity of Chalfont St Giles, Chalfont St Peter / Gerrards Cross and Beaconsfield does have the benefit of good proximity to strategic employment areas, transport connectivity varies considerably. For example, land to the east of Chalfont St Peter falls in between railway corridors and land south of Chalfont St Giles is not well linked to an A-road corridor.

Figure 6.3: Top ten increases in delay under a baseline scenario

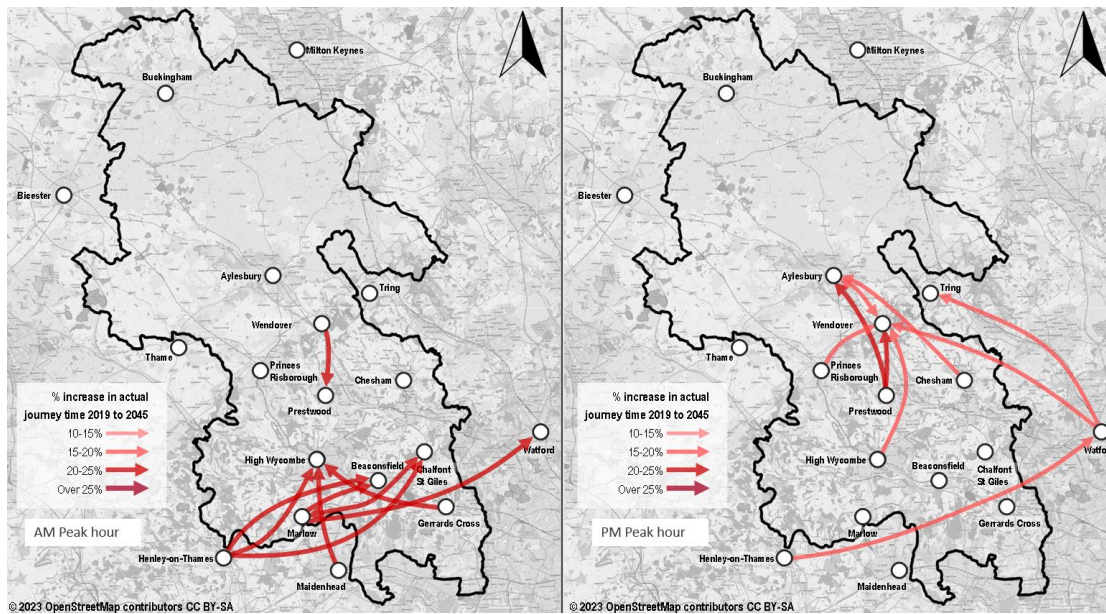
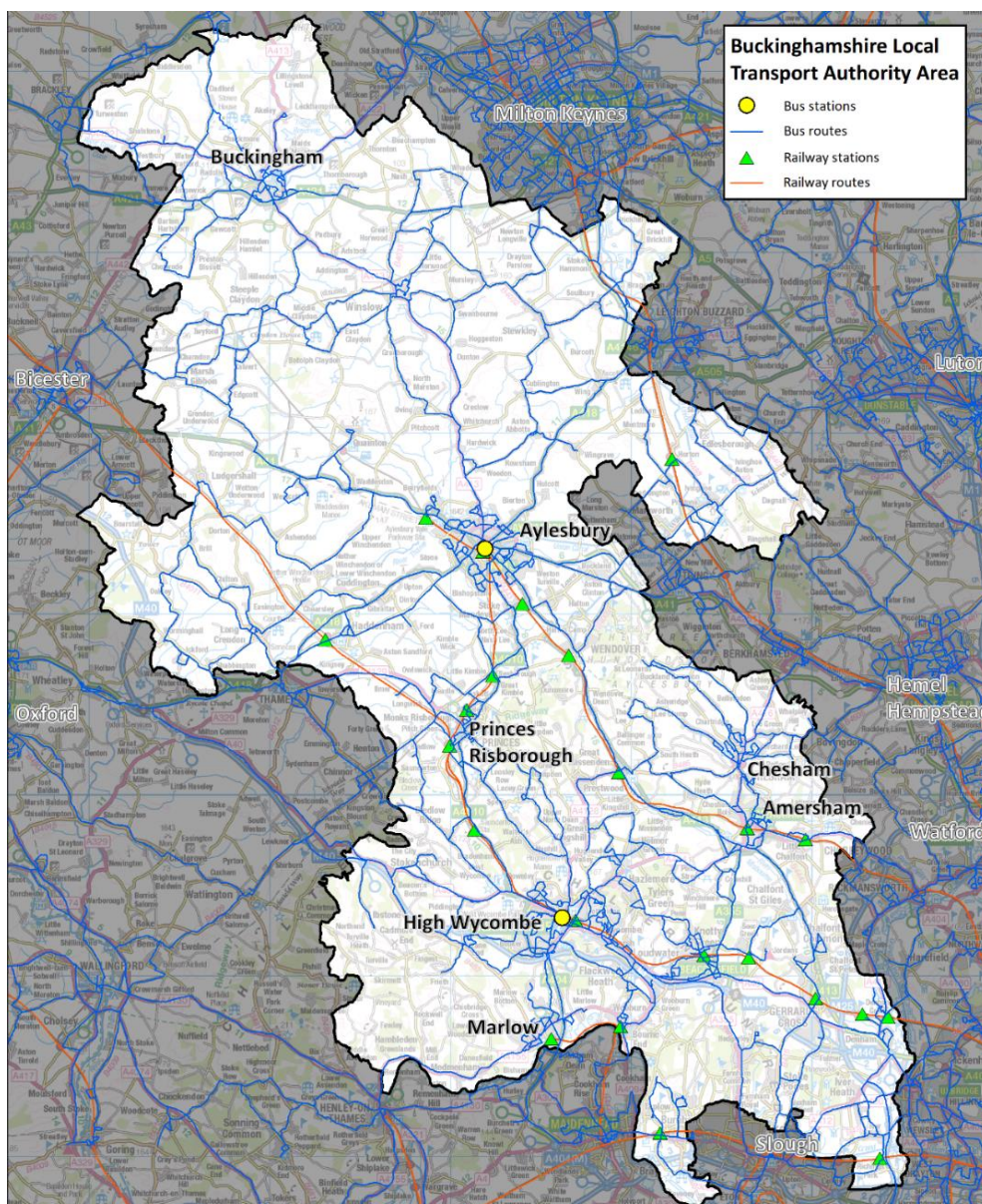


Figure 6.4: The rail and bus network



Water

Emerging preferred	Main towns	Transport hubs	Employment areas	Edge of Bucks	Other settlements	New settlements
					2	

6.3.77. Key findings of the Stage 1 Water Cycle Study (WCS, 2024) have already been introduced above, in the context of a high-level appraisal of development quanta alternatives. The following bullet points seek to elaborate:

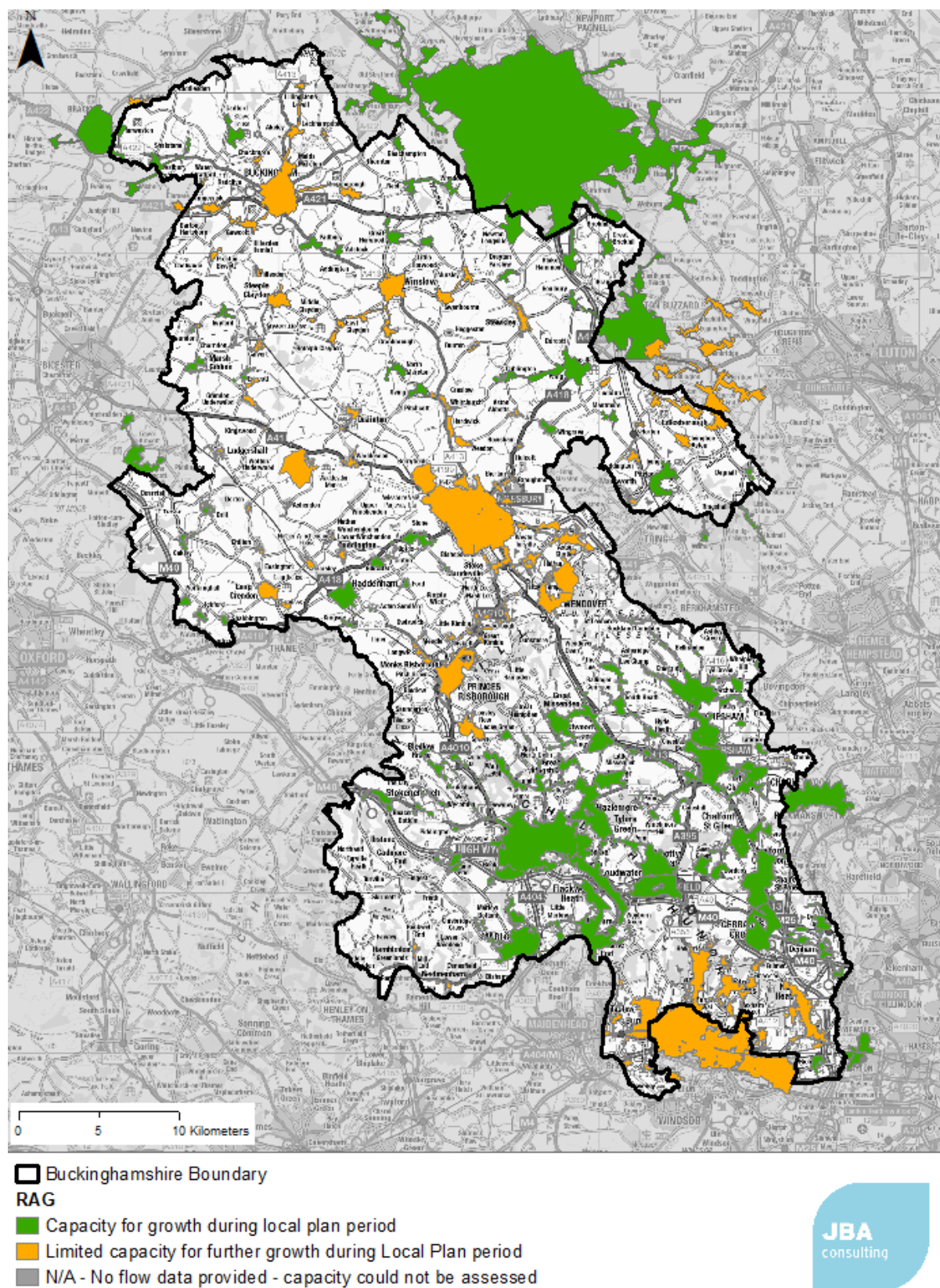
- Water resources – the WCS does not specifically discuss the possibility to targeting growth so as to avoid sensitive chalk stream aquifers (in the south of Buckinghamshire) and/or to enable high levels of water efficiency in new development; however, this is potentially something to explore. Aside from the chalk aquifers in the south of Bucks, it is difficult to envisage that variation in water resource availability / water stress will be a significant factor with a bearing on the spatial distribution of growth. However, the WCS does make the following two key recommendations:
 - “Larger residential developments (including strategic urban extensions and as planned for new settlements), and commercial developments should consider incorporating greywater recycling and/or rainwater harvesting into development at the master planning stage in order to reduce water demand.”
 - Water neutrality could be a consideration for strategic sites / new settlements.
- Wastewater collection – Victorian sewer systems can be a constraint to growth in urban areas although, on the other hand, there can be opportunities to remedy existing issues. Equally, the sewer network can be a constraint to delivery of new settlements, but delivery of new sewer infrastructure is rarely a major issue.
- Wastewater treatment – as discussed above, this is often a key issue for local plans and is high on the agenda nationally and locally. There is good spatial data available, as reported in the WCS (also see <https://theriverstrust.org/sewage-map>) to show the location of constrained WwTWs namely those with limited or no ‘headroom’ to accept further housing growth and/or those associated with a high frequency of storm overflow events. Another factor is the ability of WwTWs (and their tanks for holding untreated sewage during storm events) to be upgraded, which can vary considerably, and may be a subject for further investigation.

Figure 6.5 is key figure showing variation in available headroom capacity at WwTWs, which does show some clear spatial trends, notably highlighting good capacity across parts of the south of the County. However, there is a need to treat this map with caution ahead of further work, e.g. it is noted that Gerrards Cross WwTW was associated with a very high frequency of storm overflow in 2022, specifically spilling 66 times for a total of 1206 hours, discharging into the River Misbourne (a chalk stream).

- Water quality – is impacted not only by wastewater (treated and untreated) but also surface water flows from both the built environment and agriculture. As such, there are arguments for accounting for spatial variation in water quality regardless of wastewater treatment capacity – see Figure 6.6. However, it is important to note that there is good potential to avoid concerns regarding surface water flows from developments impacting water quality through high quality Sustainable Drainage Systems (SuDS).

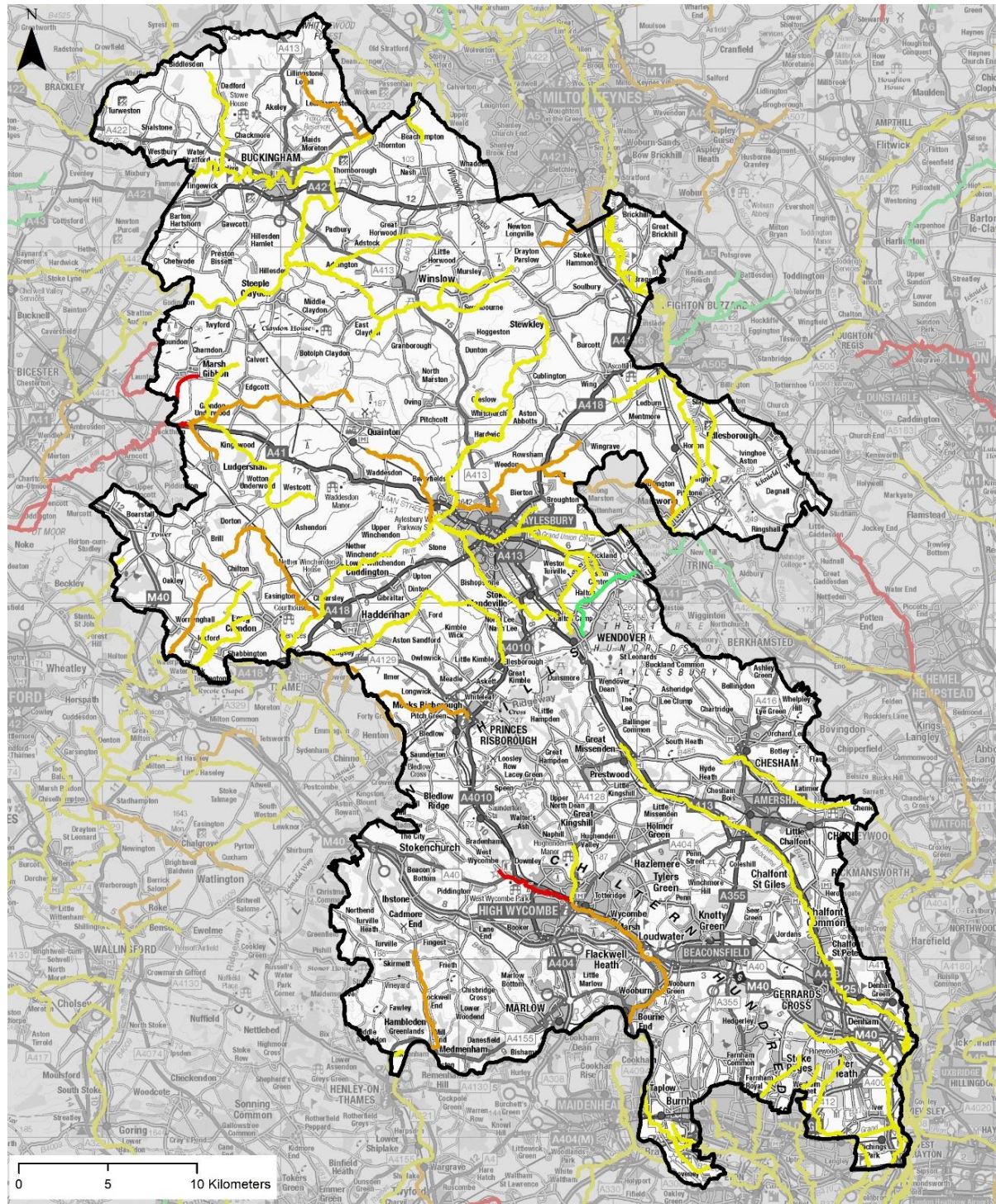
6.3.78. In conclusion, it is difficult to differentiate between the broad distribution scenarios in respect of ‘water’ objectives, other than to flag a concern with a strategy involving an emphasis on dispersal of growth cross villages, as water companies tend to favour concentrated growth and, in turn, focused efforts to deliver new/upgraded infrastructure. With regards to new settlements, there are often concerns regarding the need for new infrastructure with major cost and lead in time implications; however, there can be opportunities to apply innovative methods.

Figure 6.5: Headroom capacity at wastewater treatment works



Source: JRM-JBAU-XX-XX-MX-EN-0007-S1-P01-WwTW_RAG_Buckinghamshire.mxd
 Contains OS data © Crown copyright and database right 2024

Figure 6.6: Water Framework Directive status of rivers



- Buckinghamshire Boundary
WFD River Waterbodies - Overall Status
— High
— Good
— Moderate
— Poor
— Bad

Source: JRM-JBAU-XX-XX-MX-EN-0008-S1-P01-WFD_Overall_Buckinghamshire.mxd
 Contains OS data © Crown copyright and database right 2023

Appraisal summary

6.3.79. In summary, the appraisal finds all of the broad spatial strategy alternatives to be associated with pros and cons, and it is for the Council to weigh these 'in the balance' before taking a view on which best represents sustainable development.

6.3.80. The option of an increased emphasis on new settlements ranks highest across the greatest number of topics, but this should not be taken as in any way confirmation that it is best performing overall or best represents sustainable development. That is because: A) the sustainability topics are not assumed to have equal weight; and B) there is also a need to factor in the significance of effects. For example, were the Council to give particular weight to 'homes', 'economy' and/or transport objectives then this could lead to a conclusion that the emerging preferred scenario is the best performing overall.

Table 6.1: Summary appraisal of the broad spatial strategy alternatives¹⁷

Topic	Direction of travel	Main towns	Transport hubs	Employment areas	Edge of Bucks	Other settlements	New settlements
Accessibility	1	1	2	3	2	2	2
Air quality	1	2	1	1	2	2	1
Biodiversity	2	2	2	2	3	2	1
CC adaptation	2	3	3	2	2	2	1
CC mitigation	?	?	?	?	?	?	?
Communities & health	2	2	2	2	2	3	1
Economy	2	3	2	1	2	4	3
Historic env.	2	2	2	2	2	2	1
Homes	1	1	2	2	1	1	3
Landscape	2	2	2	2	1	2	1
Soils & resources	=	=	=	=	=	=	=
Transport	2	2	1	3	2	4	3
Water	1	1	1	1	1	2	1

¹⁷ The table includes a column for each of the alternatives introduced at para 6.3.2. The table then aims to appraise the alternatives in terms of order of preference (number) and significant effects (shading), as discussed at para 6.3.4.

6.3.81. The following headings reach conclusions on each of the alternatives in turn.

Direction of the travel

6.3.82. The current direction of travel strategy / supply (as introduced in Section 5) performs relatively well under a number of sustainability topic headings and does not perform particularly poorly under any heading. Under three topic headings there is quite strong support ('moderate or uncertain positive effects'), namely: 1) 'Accessibility', reflecting an emerging focus on strategic growth locations; 2) 'Economy and employment', reflecting an emerging focus on directing a good proportion of strategic housing growth to the south of Buckinghamshire; and 3) 'Homes' given a clear strategic commitment to providing for Local Housing Need(s) (LHN) if possible.

6.3.83. However, under three headings concerns are raised, namely: 1) 'Climate change mitigation', recognising that this is a priority issue such that all reasonable steps must be taken through spatial strategy / site selection including in respect of facilitating net zero developments; 2) 'Historic environment', in recognition of the fact that deciding site allocations across a very large number of sensitive villages (also towns) whilst avoiding/minimising constraints will be a major undertaking; and 3) 'Landscape' including recognising a likely new strategic focus on the South of Buckinghamshire.

Main towns

6.3.84. Strategic expansion of larger settlements can be an effective means of delivering new housing, given locally arising need and given a tendency for relatively 'few surprises' in respect of development viability and delivery risk. Strategic urban extension options will tend to have relatively high land value (i.e. such that a high proportion of development revenue goes to the landowner) but will benefit from being able to 'plug into' existing infrastructure, plus it will often be the case that work has been completed to establish infrastructure issues and opportunities.

6.3.85. Large strategic urban extensions can also deliver targeted infrastructure to the benefit of the existing community ('planning gain') and potentially even support efforts to redress spatial imbalances in respect of relative deprivation. Key opportunities can relate to delivering: a new secondary school; employment land; cycle infrastructure; and strategic green/blue infrastructure (for example, enhancing a river corridor leading to wide-ranging ecosystem service benefits such as in terms of biodiversity, recreational access, heritage and flood water storage / flood attenuation).

6.3.86. Large scale schemes can also achieve high-placemaking and design standards, and there can also be good potential to deliver built environment carbon emission standards that go beyond the minimum requirements of Building Regulations. Indeed, there can be potential for 'net zero carbon' development to an exacting standard (with a key aim being achievement of 'onsite' net zero, i.e. without reliance on offsetting; see Box 6.1).

6.3.87. However, opportunities all too often are not fully realised in practice, and, in turn, there is a need for early consideration of what can be achieved by competing strategic site options, including working with site promoters. An aim can be to encourage healthy competition between site promoters in terms of demonstrating the merits of their site.

6.3.88. Lessons can and should be learned from recent experiences. For example:

- In Buckinghamshire there has been a major focus on coordinated and carefully masterplanned expansion of Aylesbury, and certain aspects have been well-received nationally, for example the focus on accessible greenspace and biodiversity net gain. Also, there is a major focus on delivering new link roads between the main radial road corridors, including with a view to supporting bus and cycle connectivity. However, planning applications mainly came forward ahead of the Vale of Aylesbury Local Plan (VALP), such that there was little in the way of strategic choice through the VALP.
- This is in contrast to the edge of MK, where there was a major focus on identifying and appraising a shortlist of three competing strategic urban extension options as part of the VALP examination, prior to Shenley Park being selected as the preferred option.

- Also, within Buckinghamshire, the current emerging Buckingham Neighbourhood Plan is of note for giving consideration to a range of strategic urban extension options, in order to ensure comprehensive growth and realise infrastructure opportunities. A range of growth scenarios have been explored, including a high growth option involving more than 4,000 homes, but the current preferred option involves support for a more typical sized strategic urban extension to include a new primary school.
 - Outside of Buckinghamshire, the focus on strategic urban extensions to Bicester is of note, including given certain similarities to Aylesbury (e.g. a vale landscape). The primary focus of committed growth is to the north, however this scheme (formerly known as NW Bicester Ecotown) has faced major delivery challenges since first being allocated in 2015, and the emerging Cherwell Local Plan proposes to deliver additional growth here in support of delivery. It also proposes new strategic urban extensions elsewhere around the town, with a particular view to supporting new employment land, collocating homes and jobs and delivering strategic transport upgrades.
 - Nearby St Albans also notably recently submitted a Local Plan with a strong focus on strategic urban extensions that will deliver significant new/upgraded infrastructure alongside new homes, although there is also a package of numerous smaller allocations. The largest of the strategic urban extensions is known as Hemel Garden Communities, and has the potential to deliver 11,000 homes and 10,000 jobs.
 - At a much smaller scale, the approach taken to urban expansion of Thame, which is located close to the west of Aylesbury / Haddenham, is also of note. Specifically, decision-making in respect of urban expansion has been led by the Town Council through the neighbourhood plan-making process, with strategic direction provided by the South Oxfordshire Local Plan. Thame Neighbourhood Plan 2 was recently made.
- 6.3.89. With regards to the predicted 'limited or uncertain negative effect' under the Landscape heading, this reflects a precautionary approach in the knowledge that there can be a risk of towns expanding in such a way that characteristic landscape associations are eroded, e.g. where a town expands beyond a river valley. Equally, there can be issues of towns expanding along river and transport corridors in a way that risks 'sprawl', with new communities increasingly distant from the town centre (albeit typically linked by a relatively flat and therefore cycle friendly route). In this light, there is a clear case for ensuring a strategic, long-term approach to settlement expansion, with 'comprehensive' growth that maximises opportunities to deliver new and upgraded infrastructure (including green/blue infrastructure) rather than 'piecemeal' expansion over time.
- 6.3.90. It is also the case that the majority of the main settlements are located in the south of the County, where there is extensive landscape constraint associated with the Chilterns NL and also the Green Belt (albeit this is not a landscape designation).
- 6.3.91. Finally, there is clear support in the Transport Baseline Study (2024) for strategic extensions to the main towns, and a conclusion that a combination of Scenario 1 (Town / large village centres) and Scenario 2 (Town expansion) is *"preferred from the perspective of maximising sustainable, low carbon transport opportunities."*

Transport hubs

- 6.3.92. There is wide-ranging support for a strategy that focuses growth along transport corridors. However, transport corridors are often associated with inherent sensitivities and planning challenges, including because they will typically be associated with river corridors / valleys and a high density of historic settlement, e.g. such that maintaining settlement separation can be an issue, also traffic through town and village centres. Having said this, a corollary is that growth along transport corridors can potentially support the achievement of biodiversity, landscape and wider natural capital / ecosystem service objectives, e.g. with a focus on delivering enhancements to river corridors.
- 6.3.93. A further consideration is that a focus on transport corridors will often necessitate a cross-border and/or subregional approach. This can be relatively achievable along transport corridors and, if strategic infrastructure priorities can be established, then identified strategic growth locations can tend to be associated with low delivery risk.

6.3.94. Finally, with regards to the Transport Baseline Study (2024), key points include:

- *“Sites become far more valuable if they are to benefit from new transport infrastructure (e.g. Winslow sites with East West Rail opportunity). The Council will need to consider how this increased land value can be captured in the viability work for the local plan.”*
- *“A level of certainty of housing growth is needed to justify and facilitate investment in future transport links.”*
- *“Ultimately, the location of growth sites is critical to the level of opportunity in transport corridors and transport hubs. A focus on areas with the greatest opportunity for sustainable travel... such as the new EWR station at Winslow, would be beneficial.”*

Employment areas

6.3.95. The appraisal flags some concerns with a strategy involving an increased emphasis on growth locations well linked to a strategic employment, albeit there is much uncertainty ahead of confirming specific growth options. A key consideration is whether locations in proximity to strategic employment areas are also well-linked in transport terms.

Edge of Bucks

6.3.96. This option is difficult to appraise, as issues and opportunities are specific to the settlements and neighbouring local authorities in question, i.e. there is no broad strategic case to be made for or against directing growth to the edge of Bucks (other than, perhaps, a strategic note of caution given the challenge of cross-border collaboration in respect of infrastructure planning; also, determining whether the housing would count towards Buckinghamshire’s housing need/requirement of that of the neighbouring local authority could prove challenging). Key considerations include:

- Milton Keynes – there is a need to support growth aspirations accounting for the adopted (but non-statutory) MK 2050 Strategy and the emerging City Plan (Local Plan) 2050 and recognising that Milton Keynes is the largest local economy in the South of England and Wales outside of London. The MK 2050 strategy has a strong focus on directing growth in line with mass transit opportunities, and whilst the Draft City Plan (2024) did not make any reference to cross-border opportunities, this is an important matter for ongoing consideration. The main focus of growth within the Draft City Plan is to the east of Milton Keynes (i.e. distant from Buckinghamshire), but the plan did also propose the allocation of two strategic sites on the edge of Buckinghamshire, plus there are two allocated/committed strategic sites within Buckinghamshire on the edge of Milton Keynes. There are sensitivities to growth within Buckinghamshire around the MK edge – notably the Greensand Ridge, Whaddon Chase, the River Ouzel / Grand Union Canal corridor and sensitive villages including Whaddon – and there is a concern regarding unchecked ‘sprawl’. A focus of growth within Buckinghamshire at Winslow, which is set to become very well-linked to MK by East West Rail – could reduce the case for further growth within Buckinghamshire at the MK edge, as could a possible new settlement close to MK. Recent Government announcements regarding support for growth in this area are discussed in a recent news article [here](#).
- Slough – also forms part of a nationally significant corridor of economic activity plus the town experiences significant issues of relative deprivation and there is a clear challenge in respect of delivering on local housing needs given very limited feasible greenfield supply within the Borough. The current Slough Local Plan was adopted in 2008 and looks only to 2026 and there has been no consultation on a new Local Plan since 2021. Land within Buckinghamshire at and close to the edge of Slough is associated with a complex set of constraints, and overall, this is a very different context to supporting the growth of Milton Keynes or Aylesbury (whilst High Wycombe is a unique context, given the Chilterns NL). There is a clear growth opportunity, both given Slough-specific issues and given this is a part of Buckinghamshire where growth could align with accessibility/transport and economy/employment objectives. However, it could be a case of supporting a series of relatively modest-sized site allocations rather than one or two strategic allocations, which could lead to additional challenges in respect of effective cross-border collaboration.

- Brackley – is associated with less of a strategic growth opportunity, but there is potentially an opportunity nonetheless recognising the proximity of Silverstone, which is a strategic employment area (Buckingham is a similar distance, but less well connected). West Northamptonshire Council published a Draft Local Plan in 2024 that proposed quite modest growth for Brackley (one site for 350 homes), but the town has seen significant northwards expansion over recent years and decades. The possibility of strategic expansion into Buckinghamshire is a very distinct option that warrants testing relative to other options for the strategic expansion of Brackley (which likely means further northward expansion). Specifically, land within Buckinghamshire benefits from good links to the town centre (also Brackley's main employment area and the A43 to Silverstone) but expansion here would involve expansion beyond the A43 dual carriageway that currently bounds the eastern edge of the town (also the employment area), plus there is constraint associated with the valley of the River Great Ouse. On the other hand, HS2 passes to the east of Brackley, leading to an opportunity for growth within Buckinghamshire between the railway line and the town, and another consideration is potentially river corridor enhancement.
- Other settlements on the edge of Bucks – are associated with much less in the way of strategic choice. In the south of Buckinghamshire attention focuses on the expansion of Slough (and the linked settlements of Burnham and Langley; less so Farnham Royal and not Farnham Common, given Burnham Beeches SAC as a key constraint) with very limited if any potential for expansion of Uxbridge or Maidenhead given the River Thames and River Colne corridors (although there may be some growth opportunity at New Denham, which shares a Green Belt inset boundary with Uxbridge). The other settlements of note are then Leighton Buzzard and Tring, but there is likely little in the way of growth opportunity (at Tring expansion to the north is an option, but not the favoured option in the recently submitted Dacorum Local Plan and, in any case, land at the western extent of this sector that falls within Buckinghamshire also falls within the National Landscape). Finally, there is the important question of growth in the vicinity of the Ivers in the south of Buckinghamshire, recognising that the villages here relate very closely to both Slough and Uxbridge.

Other settlements

6.3.97. This option is shown to perform quite poorly in that it is not the preferable option under any SA topic. This reflects three key factors:

- Growth would be relatively dispersed across settlements and delivered via smaller sites, as opposed to being concentrated at strategic sites and/or concentrated across sites at a given settlement or within a particular strategic sub-area (e.g. a strategic transport corridor). The concern is that opportunities would be missed to target growth-related investment to deliver on strategic priorities, most notably in terms of new and enhanced infrastructure (including green / blue infrastructure recalling the national move to a more strategic approach to 'nature recovery' including via a new Strategic Nature Network). However, on the other hand, ensuring that the Local Plan's housing supply portfolio includes a good proportion of smaller and medium sized sites is very important from a perspective of ensuring a robust delivery trajectory, i.e., one that is suitably front loaded and is associated with minimal delivery risk, as is ensuring a good geographical spread of sites (to minimise the risk of local housing market saturation impacting delivery). Also, it is important to recognise that many villages are associated with clear growth-related opportunities, in terms of: A) meeting housing needs (e.g. some villages have seen limited housing growth over many years and decades, let alone affordable housing); B) delivering targeted infrastructure benefits (e.g. a school expansion, a village hall, a sports / recreation / play area or active travel infrastructure); and/or C) maintaining and perhaps even enhancing existing services (including bus services), facilities, retail and general village vitality.
- Higher growth at villages does naturally give rise to a concern regarding ability to access higher order services and facilities and reliance on the private car to do so. Whilst the ongoing national switch-over to electric vehicles does reduce concerns, there remains a need to minimise traffic in congestion hotspots and also along rural roads with limited capacity and through historic village centres.

- Villages can have limited potential to accept growth from a historic environment perspective and potentially a wider environmental perspective. However, it is difficult to make this case with any degree of certainty, because there is much variation across villages, accounting for factors including the landscape context (e.g. heavily wooded versus expansive vale), the built form (e.g. nucleated versus dispersed) and the extent to which there has been modern expansion beyond the historic core.
- 6.3.98. Assigning parishes a 'housing target' through the local plan, with allocations to then follow through a neighbourhood plan, can be a pragmatic approach as local plan-making efforts can then focus on allocating strategic sites to good effect (although it can also be challenging to go through a process to assign housing targets, with there being little or no clarity nationally on appropriate methodological approach). However, it is important to recognise that delegating the responsibility of allocating sites to neighbourhood plans creates a degree of delivery risk (over-and-above making the allocations through the local plan) as well as a delivery delay (in the context of likely pressure to allocate sites that are able to deliver early in the plan period, with a view to securing / maintaining a five-year housing land supply). Also, a recent Government announcement regarding reduced funding in support of neighbourhood planning has a bearing.
- 6.3.99. Finally, the Transport Baseline Study (2024) does not support this scenario, stating:
- "This scenario can be viewed as... spreading the load which avoids overloading one settlement / one part of the network. But fundamentally... this scenario is the least favoured as it will perpetuate car-based developments and will not promote the behavioural change necessary to reduce our carbon emissions issues thus contributing to climate change. This goes against the LTP5 ambition..."*

New settlements

- 6.3.100. Whilst the appraisal flags support for this option under a high proportion of the sustainability topics/objectives used as the basis for the appraisal (the assessment 'framework'), this reflects an assumption that more than 12,000 homes could be delivered in a timely manner within the plan period. In practice, new settlements are complex and highly challenging to deliver, such that they are associated with long lead in times and delivery risk. There is a need to be realistic regarding supply that can be achieved from new settlements in the plan period including the crucially important early years.¹⁸ In turn, there is a need to avoid over-reliance on new settlements within the housing delivery trajectory, as if one or more is delayed or fails to deliver the effect could be that Buckinghamshire fails to deliver on its committed housing requirement leading to punitive measures ('the presumption in favour of sustainable development'). Having said this, once commenced, new settlements can be an effective means of delivering new homes at a fast rate (e.g. a new settlement might have two or three sales outlets, each able to deliver perhaps 150 homes per year). Also, existing land value can tend to be relatively low (i.e. limited 'hope' value in comparison to land at the edge of settlements), and it can be possible to create competition between site promoters to drive down the price of land, all supportive of development viability and, in turn, funds available for infrastructure, non-housing uses on-site, affordable housing, net zero, etc.
- 6.3.101. In this light, new settlements can represent a major opportunity, in respect of delivering on housing objectives alongside wider plan / sustainability objectives. They can also be strategically located, e.g. with a view to supporting strategic transport or employment growth objectives. There is explicit support for new settlements within the NPPF (paragraph 63), particularly when delivered in line with garden community principles.

¹⁸ There will likely be a need to set the housing requirement at LHN from the outset of the plan period and then deliver on that requirement year on year, such that ensuring there are "deliverable" sites (NPPF para 72) able to deliver early in the plan period is of key importance (ahead of a Local Plan Review, which can then boost supply over latter years to 2045 as necessary). There can be the potential to argue for a 'stepped' requirement whereby the requirement is lower in the early years (e.g. below LHN) and then commensurately higher in the latter years (e.g. above LHN) which can then open the door to increased reliance on supply from new settlements. However, there is quite a high bar to justifying a stepped requirement, which essentially involves deferring meeting housing need. Specifically, there is a need to demonstrate that there are barriers to higher growth in the early years of the plan period and/or major opportunities to be realised through high growth late in the plan period.

- 6.3.102. With regards to the Transport Baseline Study (2024), it is important to be clear that there is a preference for strategic urban extensions over new settlements. However, this does reflect concerns around infrastructure delivery that could potentially be addressed through careful planning. The Study notably states:
- *“New settlements would need to be of a large enough scale to support itself and justify the infrastructure spend needed to connect to existing infrastructure. Otherwise, it would be perpetuating a car dependent society.”*
 - *“Where a site relies on proposed new infrastructure, even where it is included in the plans of the relevant authorities, the level of certainty over delivery and timing of that infrastructure is crucial to avoid a poorly connected, car dependent... population.”*
- 6.3.103. Moving forward, there will clearly be a need to explore new settlement options accounting for train / mass transit connectivity opportunities and also land subject to limited constraint including airfields. A further important consideration is landownership, including working with landowners willing to work proactively with the Council including with a focus on maximising land value capture in support of infrastructure funding.
- 6.3.104. However, it will also be important to shortlist / select new settlement options on the basis of a wide range of criteria, e.g. also considering the position of a new settlement within the landscape including how it relates to existing settlement and land use patterns. As part of this, it can be important to consider how topography and land uses such as woodlands (also infrastructure such as train lines) can help to ‘frame’ new settlements and ensure a clear identity. The aim can also be to ensure new settlements benefit from a strong degree of containment, thereby minimising concerns around long term sprawl; however, on the other hand, there can be a case for supporting new settlements where there is a clear opportunity for organic growth over the long term.
- 6.3.105. In this regard, it is noted that the Planning Minister recently spoke (July 2025) about the importance of new towns all having their “own character” and “a unique identity” that is “very specific to a particular place”, although the Minister also spoke about new towns being able to “evolve organically over time”.
- 6.3.106. A further consideration is around ensuring realistic assumptions regarding the level of modal shift that can be achieved (as part of a ‘vision-led’ transport strategy) and residual needs to travel by car. In turn, the importance of directing to new settlements to main road corridors rather than rural locations linked by minor roads will need to factor in (and, in turn, potentially the need to deliver costly road and junction upgrades).
- 6.3.107. Finally, it will be important to liaise closely with neighbouring authorities if it transpires that there are realistic new settlement options close to the edge of Bucks, including accounting for any new settlements / strategic growth locations that might be proposed nearby in the neighbouring authority area.

7. The emerging preferred approach

Introduction

- 7.1.1. The following text was **prepared by Buckinghamshire Council Officers** in response to the appraisal above (by AECOM). The text below does not amount to an appraisal.

The emerging preferred approach

- 7.1.2. Beginning with the growth quanta appraisal presented in Section 6.2, there is broad agreement with the appraisal conclusion that whilst there is limited strategic case to be made for setting the housing requirement at a figure that departs from Local Housing Need (LHN), there is a need to remain open to both lower and higher growth scenarios at the current time. Specifically, a final decision will need to be made subsequent to the current consultation in light of consultation responses, further evidence-gathering and detailed work to examine site, settlement and broad spatial strategy options.
- 7.1.3. With regards to lower growth, whilst there is clearly a very high evidential bar that must be reached in order to justify any such strategy, it will only be possible to rule this out as an option subsequent to further work to review and assess supply options (see discussion in Section 5 regarding the range of workstreams). With regards to higher growth, this would likely be with a view to making provision for unmet need; however, as things stand none of Buckinghamshire's neighbouring authorities have put forward an evidenced case for exporting unmet housing need to Buckinghamshire.
- 7.1.4. With regards to the appraisal of broad strategy alternatives presented in Section 6.3, the 'direction of travel' strategy in respect of housing land supply that is published for consultation at the current time is found to perform suitably well through the appraisal such that it is demonstrably: *"Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence"* (NPPF para 36).
- 7.1.5. However, it is important to emphasise that the direction of travel is an interim position reached on the basis of limited work completed to date. There is a need for much further work subsequent to the current consultation to explore site, settlement and broad strategy options, before then appraising formal reasonable alternatives ('growth scenarios') through the SA process and then deciding on a final preferred strategy / approach to housing land supply for publication under Regulation 19.
- 7.1.6. As part of future work account will be taken of the appraisal findings presented in Section 6.3 as well as consultation responses made with reference to the appraisal. At this stage all of the key messages to come out of the appraisal are duly noted, including:
- Limited clear case to be made for an additional emphasis on the main towns.
 - A case for additional emphasis on transport hubs but notes of caution regarding implications for accessibility, homes and climate change adaptation objectives.
 - A case for additional emphasis on settlements well linked to a key employment areas but significant notes of caution regarding accessibility, homes and transport objectives.
 - A clear case for further work to be undertaken to explore growth options at the edge of Buckinghamshire albeit with some location dependent notes of caution. The message regarding the need for early and effective cross-border collaboration is also noted.
 - A clear case for avoiding an undue emphasis on the dispersal of growth across smaller settlements, albeit the appraisal is also strongly supportive of ensuring that there is strong element of supply from smaller settlements and small sites as part of the mix.
 - Clear pros and cons to any strategy involving an increased emphasis on new settlements. As discussed through the appraisal, as well as carefully considering the suitability of new settlement options, there will be a need to take an early view on which options reach the threshold of being developable in the plan period and then for each generate an early view regarding delivery trajectories and also delivery risks.

Part 2: SA findings at this stage?

8. Introduction to Part 2

- 8.1.1. The aim here is to discuss the current Draft Plan as a whole (whilst recalling that it is an early draft plan). Specifically, presented below is a light touch ‘commentary’ under the SA framework, which aims to discuss both A) the emerging preferred approach in respect of growth quantum and spatial strategy (building upon Sections 6 and 7); and B) the emerging preferred approach to development management (DM) policies.
- 8.1.2. A fuller appraisal will be completed at the next stage, i.e. ahead of Regulation 19. At this stage the plan will be complete with site allocations and DM policies that have been finalised in response to strategy/sites and also potentially National DM Policies.

9. Appraisal of the current Draft Plan

9.1. Accessibility (to community infrastructure)

- 9.1.1. The appraisal in Section 6.3 is strongly supportive of the **direction of travel** strategy / supply, including because there is a clear commitment to directing growth strategically – with a view to realising opportunities, likely to include community infrastructure – whilst also recognising the importance of aligning growth with the settlement hierarchy.
- 9.1.2. With regards to the draft **DM policies**, numerous are broadly supportive of accessibility objectives and it is not clear that any give rise to a significant degree of tension. Most align with standard national practice with limited local specificity, which inherently reduces the potential to reach conclusions on significant effects (the aim of SA). In this regard, it is also important to recognise that the Government has committed to publishing National Development Management Policies (NDMPs) later in 2025. Moving forward it will be crucially important to develop policies for site allocations setting out what will be required of developers in respect of delivering or funding / facilitating community infrastructure. Doing so will represent an important stage of decision-making, because there will be a need to balance competing objectives and potentially accept compromises / trade-offs, recognising the limitations of development viability.

9.2. Air quality

- 9.2.1. The appraisal in Section 6.3 is overall ‘neutral’ on the **direction of travel** strategy / supply. There are no major concerns but there will be a range of issues and opportunities to factor in as part of future work to explore strategy / site / supply options.
- 9.2.2. With regards to the draft **DM policies**, air quality is a focus of two policies, but these reflect national standard practice (in the context of forthcoming NDMPs), including the requirement that certain applications will be required to submit an air quality impact assessment. Moving forward it will be important to develop policies for site allocations with potential to increase traffic through known air pollution hotspots (which primarily means AQMAs) that seek to ensure all reasonable steps are taken to support modal shift away from the private car, for example (and notably for many sites) by delivering or funding / facilitating new and upgraded active travel infrastructure, including strategic routes in line with the Local Cycling and Walking Infrastructure Plans (LCWIPs).

9.3. Biodiversity

- 9.3.1. The appraisal in Section 6.3 is overall ‘neutral’ on the **direction of travel** strategy / supply. However, the appraisal recognises that there are wide-ranging significant constraints to growth around many of Buckinghamshire’s settlements and, in turn, flags potential support for an increased emphasis on new settlements, also recognising that new settlements (and other large scale strategic growth locations) can be well placed to realise opportunities in line with the emerging Local Nature Recovery Strategy (LNRS). It can be noted that neighbouring Hertfordshire is currently consulting on its LNRS.

- 9.3.2. With regards to the draft **DM policies**, biodiversity is an important focus of a range of policies, including some that respond to locally specific issues / opportunities, perhaps most notably those that deal with implementing the mitigation strategies for internationally designated sites. These policies are carefully crafted policies that respond to site-specific sensitivities / pressures, but it is difficult to suggest any potential for a choice between alternatives, e.g. a less stringent approach that is more permissive of growth nearby to the designated sites in question. One consideration can relate to balancing recreational access with onsite biodiversity objectives within Suitable Alternative Natural Greenspaces (SANGs) that aim to mitigate recreational pressure on internationally designated biodiversity sites. Moving forward, it will be important to note that delivering SANG and other mitigation measures can create a challenge for bringing forward development sites. In turn, this will need to factor in as a development viability consideration when finalising DM policies and when writing site specific policies, and it should also factor in as part of further detailed work on spatial strategy / site selection.

9.4. Climate change adaptation

- 9.4.1. The appraisal in Section 6.3 is overall 'neutral' on the **direction of travel** strategy / supply. There are no major concerns but there are a range of issues and opportunities to feed into future work to explore strategy / site / supply options. It is recognised that limited developable supply options could potentially be a barrier to providing for Local Housing Need (LHN) through the Local Plan, and that LHN is often described as a 'mandatory target', but there is little reason to suggest that this could lead to pressure to compromise on objectives around avoiding / minimising flood risk.
- 9.4.2. With regards to the draft **DM policies**, flood risk is a focus of two policies, but these reflect national standard practice (in the context of forthcoming NDMPs), including the requirement that certain applications must submit a site-specific flood risk assessment. Moving forward, where sites are affected by significant flood risk it will be important to consider concept masterplanning with a view to generating confidence that the site can deliver in a way that avoids flood risk (e.g. with areas at flood risk left undeveloped as part of the onsite green/blue infrastructure) whilst also delivering on wider objectives and remaining viable. This will assist with passing the Sequential Test, i.e. demonstrating that sites have been selected with a sequential approach taken to avoiding flood risk.

9.5. Climate change mitigation

- 9.5.1. The appraisal in Section 6.3 flags a concern with the **direction of travel** strategy / supply but is not able to suggest that any of the alternatives appraised are preferable. The appraisal focuses on built environment decarbonisation (rather than transport decarbonisation) and the appraisal conclusion reflects the urgency of the issue, given decarbonisation commitments / targets, i.e. given the urgency there is a high bar to concluding even a neutral effect, let alone a positive effect. Moving forward there should be a focus on: A) supporting sites well suited to delivering net zero development (or otherwise achieving greenhouse gas emissions standards beyond the requirements set out in Building Regulations) accounting for development viability; and B) reflecting latest policy, precedent and best practice around net zero development DM policy.
- 9.5.2. With regards to the draft **DM policies**, there is currently no explicit focus on built environment decarbonisation, including recognising that the policy environment nationally is currently in a state of flux (the Government has committed to updating guidance) and precedents are regularly being established regarding what can and cannot be required through local plans. This is reasonable, but it is important to note that over recent years net zero carbon development DM policy has been a key consideration for many local plans and also local plan viability assessments, e.g. with close consideration given to implications for affordable housing. A number of Buckinghamshire's neighbours have published draft local plans that seek to require net zero developments with performance calculated using the 'Energy Use Intensity' approach (as distinct from the Target Emissions Rate approach that is employed under the Building Regulations) including Milton Keynes and Wokingham.

9.6. Communities and health

- 9.6.1. The appraisal in Section 6.3 is overall ‘neutral’ on the **direction of travel** strategy / supply. However, the appraisal recognises that the scale of growth that will need to be delivered through site allocations will inevitably generate wide ranging significant concerns amongst local communities (notwithstanding the fact that the baseline situation is one whereby growth occurs at a similar rate but in a less coordinated way under the presumption in favour of sustainable development). In turn, the appraisal flags potential support for an increased emphasis on new settlements, also recognising that new settlements can be well placed to deliver best practice place-making (‘garden towns’).
- 9.6.2. With regards to the draft **DM policies**, numerous are broadly supportive of communities objectives, but these mostly reflect national standard practice, as opposed to seeking to respond to local issues / opportunities / choices. The criteria for determine planning applications required to submit a Health Impact Assessment appear to align with national standard practice but will warrant further scrutiny prior to plan finalisation. A further proposed policy requirement of note relates to community (food) growing within development sites, which is clearly supported from a communities / health perspective.
- 9.6.3. Finally, under this heading it is appropriate to consider the important matter of providing for **Gypsy, Traveller and Travelling Showpeople accommodation needs**. The current consultation document is commendably clear on the scale of needs that must be addressed but the process of deciding how to address needs is at an early stage, which is concerning because needs are extensive and providing for needs is invariably challenging (even where modest), including because of a lack of available sites in suitable locations. Moving forward this issue will need to be addressed head-on, because poor accommodation can be a barrier to maintaining the traditional way of life, can lead to tensions with settled communities and contributes to acute issues of relative deprivation, with Travellers on average having very poor outcomes across health, education and other indicators, as discussed [here](#). A recent [blog](#) prepared on behalf of the RTPi explained how failing to provide for accommodation needs is all too common.
- 9.6.4. In particular, it is all-too common to defer the matter of providing for needs, for example:
- Wiltshire – the Inspector examining the submitted Local Plan recently wrote to the Council explaining: “... we note that the Plan does not specifically address the matter of travellers housing needs as it is otherwise intended to be dealt with under a separate Gypsies and Travellers Development Plan Document (DPD)... anticipated to be adopted by Quarter 3 of 2025. In light of that situation, we would welcome an update on the current status of the... DPD, together with the Council’s view as to whether there should be provisions in the Plan to ensure certainty of how those needs would otherwise be met in the event that the... DPD were not to reach adoption.” As of February 2025 there were understood to be some issues, as reported [here](#).
 - Maidstone – the Local Plan was adopted in 2024 with reliance on a follow-on plan to meet a need for 500 pitches and 7 plots, and that plan has made limited progress.
 - Windsor and Maidenhead – the Local Plan was adopted in 2022 on the assumption that a follow-on plan would be adopted post-haste, but there has been no progress.¹⁹
 - Rugby – the Local Plan was adopted in 2019 with an unmet need to be addressed through a follow-on DPD, and now a need for 94 pitches is being dealt with through the emerging new Local Plan as discussed within a recent [Interim SA Report](#).²⁰

¹⁹ The Inspectors Report stated: “It is unfortunate that the Traveller Local Plan has been delayed, but... good progress has been made... Most recently, an Issues and Options Report and a Site Assessment Methodology were published for consultation.”

²⁰ The Inspectors Report stated: “Whilst the Plan does not provide a supply of deliverable and developable sites to meet the accommodation needs of gypsies and travellers in full, I am satisfied that the combination of the criteria based approach in Policy DS2 and a Gypsy and Traveller Site Allocations DPD will enable the Council to meet [needs].”

- 9.6.5. Needs are often very localised, and there is also a need to distinguish between needs for pitches/plots on publicly owned and managed sites versus private sites. There is a need to carefully consider whether extending or intensifying existing sites is appropriate, and there is also a need to recognise that whilst there can be an opportunity to deliver pitches (less so plots for Travelling Showpeople) as part of strategic housing or employment-led sites, this can generate a degree of delivery risk.
- 9.6.6. There is also a call for Gypsies, Traveller and Travelling Showpeople sites underway alongside the current consultation, and the consultation document presents the following options in respect of identifying new supply (N.B. not mutually exclusive):
- Assess whether any temporary, unauthorised sites or sites pending planning permission would be suitable for allocation.
 - Assess whether any of the existing sites can be intensified or extended to accommodate more pitches and plots.
 - Consider whether existing pitches that have been identified as currently occupied by non-travellers can alternatively be occupied by Gypsies and Travellers.
 - Review the outstanding allocations in previous local plans.
 - Assess all sites that have been promoted for Traveller uses through calls for sites.
 - Assess if there are any recent planning applications that have been refused that could be reassessed and the reasons for refusal be overcome.
 - Consider if any of the sites promoted for other uses could be suitable for a Gypsy and Traveller site or a Travelling Showpeople yard.
 - Assess if there are any suitable grey belt sites suitable for a Traveller allocation.
- 9.6.7. Finally, Box 9.1 considers key messages from the standalone Health Impact Assessment (HIA) that is also published as part of the current consultation.

Box 9.1: Key messages from the Health Impact Assessment (HIA)

The HIA focuses on the draft DM policies and concludes:

“The draft policies... were reviewed against six health themes: ‘Neighbourhood design’, ‘Healthy homes’, ‘Healthier food environments’, ‘Natural and sustainable environments’, ‘Transport and movement’ and ‘Healthy economy’... It is noted that the draft Local Plan has broadly positive impacts on health and wellbeing. However, several key areas were found across the policies that would benefit from a review particularly in areas relating to ‘Healthy food environments’ and ‘Transport and movement’. More widely, there is a notable lack of consideration of the impacts of development on vulnerable residents, which could potentially worsen inequalities and access for these populations.”

Key recommendations relate to considering additional policy emphasis on:

- Vulnerable groups at greatest risk of experiencing health inequalities.
- Active travel provision such as cycleways and walking routes, particularly within rural areas.
- Improving access to green spaces where planning applications deal with existing buildings.
- Air quality impacts associated with large developments (particularly through increased car usage and heavy machinery) as well as a worsening of existing light and noise pollution.
- Creation of new retail spaces and recreational facilities including with a focus on increasing the availability of healthy food options, without a reliance on fast food and takeaway shops.

These recommendations are all broadly supported in that none generate obvious tensions with wider objectives. However, the recommendations relating to infrastructure and use mix could have development viability implications (and, in turn, implications for wider objectives, including affordable housing-related) that will require careful consideration. In turn, the recommendations from the HIA should feed into spatial strategy / site selection as well as DM policy.

9.7. Economy

- 9.7.1. The appraisal in Section 6.3 is strongly supportive of the **direction of travel** strategy / supply in respect of housing, including because there is a clear commitment to directing growth to locations in proximity / well-linked to strategic employment areas.
- 9.7.2. With regards to the draft **DM policies**, the key point to note is the policy approach to protecting, renewing, and intensifying existing employment sites. This is an important matter for the Local Plan, because there is the potential to account for new supply from intensified sites, and because there can alternatively be the potential to support targeted release of employment land for other uses, which primarily means residential. There are also bespoke policies for certain key strategic employment sites, and it is also noted that developments involving over 100 homes will be required to “contribute to local employment and skills”, which will be something else to factor into viability assessment.
- 9.7.3. Finally, under this heading it is appropriate to consider the important matter of providing for **employment land needs**. Whilst there are currently no proposed allocations, the emerging commitments in respect of employment land are considered very proactive, in that: A) whilst employment land needs are established on the basis of a preferred economic forecast, there is an acknowledgement that economic forecasting is inherently uncertain that that forecasts suggesting higher need must also be given due consideration; B) there is an acknowledgement that there are a range of larger-than-local needs that whilst not necessary needing to be provided for in Buckinghamshire could potentially be with a view to supporting the sub-regional, regional and national economy (notably datacentres and warehousing/distribution); and C) there is an acknowledged need for a good mix of sites / supply, including geographically and including with a focus on protecting most existing employment sites. The Rugby Local Plan is commended as taking a proactive and overall good practice approach to exploring options in respect of responding to need for large scale employment sites to support warehousing / distribution and research and development (R&D), see [here](#).

9.8. Historic environment

- 9.8.1. The appraisal in Section 6.3 flags a concern with the **direction of travel** strategy / supply but is not able to suggest that any of the alternatives appraised are preferable, beyond flagging a theoretical case for an added emphasis on new settlements. Whilst the current consultation is high level it is hoped that Historic England will be able to engage and set out key issues and opportunities that it wishes to see factored-in as part of work to finalise the strategy / sites / supply and expectations around evidence-base.
- 9.8.2. With regards to the draft **DM policies**, whilst there is a policy dedicated to the historic environment this reflects the nationally standard approach. Moving forward, it will be important to set out clear criteria in site specific policies in respect of avoiding and mitigating historic environment impacts (also realising opportunities) recognising that this can have a significant bearing on masterplanning etc and, in turn, a bearing on wider policy objectives and viability. The recent Draft [Test Valley](#) Local Plan is notable for clearly setting out key historic environment considerations for all draft allocations. A final key consideration is then non-designated archaeology, which can have a significant bearing on site capacity and masterplanning/layout at the planning application stage (there is recent experience of this locally) such that, in turn, there is a need to account for constraints as far as possible through plan-making (but this is inherently difficult as constraints are typically only understood following investigation at the application stage).

9.9. Homes

- 9.9.1. The appraisal in Section 6.3 is strongly supportive of the **direction of travel** strategy / supply in respect of housing, essentially because: A) there is a commitment to setting the housing requirement at Local Housing Need (LHN) over the plan period if possible (i.e. such that the plan does not generate unmet need); B) there is an acknowledgement that the possibility of neighbours putting forward an evidenced case for exporting unmet need to Buckinghamshire cannot be ruled out; C) it is recognised that, whatever housing requirement is ultimately set, there will be a need for a supply that exceeds the requirement as a contingency for delivery risk (at least over early years); and D) the importance of a mixed / balanced supply portfolio is recognised including smaller sites at villages. However, there is much uncertainty, and, amongst other things, the possibility of a stepped requirement cannot be ruled out, i.e. a situation whereby providing for LHN is deferred until later in the plan period once strategic sites are delivering.
- 9.9.2. With regards to the draft **DM policies**, whilst the discussions above have flagged few concerns regarding DM policies having negative implications for sustainability objectives (of any significance), under this current 'homes' topic heading it is important to say that non-housing DM policies in combination can have a significant impact on development viability and, in turn, a significant impact on the potential for sites to deliver the full policy quota of affordable housing (in terms of total amount and/or tenure mix). This is a common occurrence nationally, even in areas with stronger development viability, and it is not uncommon for planning applicants to argue that development viability and policy requirements combine with the effect that a site cannot deliver any affordable housing. Moving forward, it will be crucially important to consider the balance of DM policy requirements in the context of development viability parameters, including affordable housing policy (and including with a focus on maximising delivery of social rented).

9.10. Landscape

- 9.10.1. The appraisal in Section 6.3 flags a concern with the **direction of travel** strategy / supply but is not able to suggest that any of the alternatives appraised are preferable, beyond: A) flagging a theoretical case for an added emphasis on new settlements; and B) highlighting that certain settlements on the edge of Bucks may be associated with a degree of relative landscape capacity. The concern is that there will be a need for extensive work subsequent to the current consultation to understand landscape constraints to inform detailed spatial strategy / site selection and site-specific policy (e.g. concept masterplans for strategic sites), albeit expectations in respect of the required evidence-base are not as clear cut as is the case for the Historic Environment.
- 9.10.2. With regards to the draft **DM policies**, a key proposal for scrutiny at the current time is the proposal to remove the existing designated local landscapes in the Aylesbury Vale area. Whilst landscapes outside the National Landscape would still have policy protection (and evidence can still be generated to understand variability in respect of sensitivity/constraint), this proposal does generate a tension with landscape objectives (but is supported in terms of housing and other growth objectives). Moving forward there could be potential to revisit the possibility of a local designation, given the scale of the plan area and diversity of landscape, albeit the evidential bar is set quite high. Any such local landscape designation would also generally be helpful to those seeking an 'at a glance' understanding of areas more / less suitable for growth across Bucks, when read alongside other mapped designations including Green Belt / grey belt and the headline mapped outputs of the emerging Local Nature Recovery Strategy (LNRS).

9.11. Soils & resources

- 9.11.1. The appraisal in Section 6.3 is overall 'neutral' on the **direction of travel** strategy / supply. There is no clear national guidance on the degree of significance that should be placed on avoiding areas of best and most versatile (BMV) agricultural land (also accounting for the three grades of BMV land, namely grades 1, 2 and 3a) but the concentration of grade 1 quality land in the Langley area will certainly need to factor in. Also, in the Slough area (as well as others) accounting for known minerals resources may be another factor with a bearing on ongoing spatial strategy / site selection.
- 9.11.2. With regards to the draft **DM policies**, avoiding the loss of productive agricultural land is not something that can effectively addressed through DM policy (beyond retaining land within sites as orchards and allotments). Aside from agricultural land, another consideration for discussion under this heading is the possibility of policy requirements in respect of development aligning with 'circular economy' principles, most notably requirements around reusing buildings ahead of demolition where possible. This is a key built environment decarbonisation consideration nationally, and Essex County Council is taking a lead on this nationally through the [Essex Design Guide](#).

9.12. Transport

- 9.12.1. The appraisal in Section 6.3 is overall 'neutral' on the **direction of travel** strategy / supply but flags that there could well be scope to adjust the direction of travel with a view to capitalising on strategic transport issues and opportunities informed by consultation responses, emerging policy (not least Buckinghamshire LTP5) and detailed technical work. The reality is that work to align spatial strategy / site selection with transport objectives is invariably a key focus of any local plan-making process.
- 9.12.2. With regards to the draft **DM policies**, whilst numerous have positive implications for transport objectives (and it is difficult to meaningfully flag any with significant negative implications), moving forward there will be a need for further detailed work to respond to locally specific issues and opportunities accounting for spatial strategy / site allocations. Moving forward, matters to explore will include: A) walking and cycling / wheeling infrastructure (both strategic, e.g. linking settlements, and less strategic, e.g. within sites), maintaining and enhancing bus services including along strategic routes (including with the aim of genuinely 'fast and frequent' services), delivering enhancements to the strategic road network to minimise problematic traffic congestion (including recognising that traffic is a barrier to effective bus services and cycling) and potentially exploring options for 'mobility hubs' (more and less strategic), see [here](#).

9.13. Water

- 9.13.1. The appraisal in Section 6.3 is overall 'neutral' on the **direction of travel** strategy / supply, however there are a range of issues and uncertainties that will require further consideration. National practice in respect of directing growth in line with understanding of wastewater treatment infrastructure constraints and opportunities is not well advanced, but every effort will be made to account for the consultation responses received from the water companies and the Environment Agency.
- 9.13.2. With regards to the draft **DM policies**, a key proposal is to require a standard of water efficiency within all new developments significantly above the minimum requirements set through Building Regulations. This is clearly supported from a 'water' perspective and could well prove to be justified overall given that water resource availability and water levels in sensitive aquifers and water bodies is an issue locally. However, there will be a need to assess implications for development viability and, in turn, implications for wider policy objectives, e.g. affordable housing and net zero.

9.14. Appraisal conclusion

- 9.14.1. The appraisal above has provided an opportunity to: A) recap messages in respect of Option 1 from the preceding alternatives appraisal (Section 6.3); B) comment on the direction of travel in respect of employment and providing for Gypsy and Traveller accommodation needs; and C) comment on draft DM policies.
- 9.14.2. With regards to (A):
- Under most sustainability topic headings the appraisal concludes a 'neutral' effect at the current time including accounting for the difficulty of drawing conclusions given the high-level nature of the direction of travel supply/strategy.
 - Under three topic headings there is quite strong support ('moderate or uncertain positive effects') for the Draft Plan, namely: 1) 'Accessibility', reflecting an emerging focus on strategic growth locations (strategic sites and concentrations of growth); 2) 'Economy and employment', reflecting an emerging focus on directing a good proportion of strategic housing growth to the south of Buckinghamshire; and 3) 'Housing' including because a commitment to providing for LHN in full if possible.
 - Under three headings concerns are raised ('moderate or uncertain negative effects'), namely: 1) 'Climate change mitigation', recognising that this is a priority issue that must feed into spatial strategy / site selection; 2) 'Historic environment', in recognition of the fact that deciding site allocations across a very large number of sensitive villages (also towns) whilst avoiding/minimising constraints will be a major undertaking (e.g. Historic England often request site-specific Historic Impact Assessments); and 3) 'Landscape' including recognising a likely new strategic focus on the South of Buckinghamshire.
- 9.14.3. With regards to (B), the emerging commitments in respect of employment land are considered very proactive, but there are some concerns regarding the realistic potential to provide for Gypsy and Traveller accommodation needs in full.
- 9.14.4. Finally, with regards to (C) (draft thematic / development management policies), the appraisal at this stage is 'light touch' recognising that there will be a need to revisit policies subsequent to the current consultation in order to: A) ensure policies reflect the preferred spatial strategy / sites / supply; and B) account for likely forthcoming National Development Management Policies (NDMPs). It will be crucially important that clear decisions are taken regarding how to balance competing DM policy objectives in the context of development viability accounting for preferred spatial strategy / allocations.

Part 3: Next steps

10. Plan finalisation

- 10.1.1. Subsequent to the current consultation consideration will be given to consultation responses received and further evidence-gathering / analysis before work is undertaken to define and appraise reasonable alternatives in the form of growth scenarios.
- 10.1.2. Work to appraise growth scenarios will inform preparation of the final draft ('proposed submission') version of the Local Plan, which will then be published under Regulation 19 of the Local Planning Regulations.
- 10.1.3. The formally required SA Report will be prepared for publication alongside, essentially tasked with presenting an appraisal of "the plan and reasonable alternatives" (the centrally important requirement; see Regulation 12(2) of the SEA Regulations).
- 10.1.4. Once the period for representations on the Local Plan / SA Report has finished the intention is to submit the plan for examination in public alongside a summary of the main issues raised through the Regulation 19 publication period.
- 10.1.5. At examination one or more Government-appointed Inspector(s) will consider representations before identifying modifications necessary for soundness. Modifications will then be prepared (alongside SA if necessary) and subjected to consultation.
- 10.1.6. Once found to be 'sound' the Local Plan will be adopted. At the time of adoption a 'Statement' must be published that sets out (amongst other things) "the measures decided concerning monitoring".

11. Monitoring

- 11.1.1. The SA Report must present "measures envisaged concerning monitoring".
- 11.1.2. This current report is not the formal SA Report; however, on the basis of the appraisal presented in Section 9 it is suggested that early consideration might be given to monitoring indicators in respect of employment land and Gypsy, Traveller and Travelling Showpeople accommodation needs, as these are key policy areas where up-to-date data on need vs supply is crucial to informing strategy / policy / plan-making.
- 11.1.3. Finally, it is recognised that the Government has placed a considerable emphasis on an 'outcomes' approach to local plan-making, and central to this is gathering good data that can then be used to understand the baseline situation for an area and, in turn, can be used to inform the assessment of local plan options (policy, strategy, etc). The Government recently published a draft Outcomes Framework for Local Government, which includes a large number of metrics that might be a focus of ongoing monitoring. Within this, one of the key focuses is on health metrics, and this is a matter of considerable relevance (see discussion of the stand-alone HIA in Box 9.1, above). As part of any future monitoring in respect of health outcomes, consideration can also be given to two recent publications dealing with the links between local plan-making and health. Those publications are available here and here and both include a considerable emphasis on gathering data that can then be used to inform local plan-making.

Appendix I: Regulatory requirements

As discussed in Section 1, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report. However, interpretation of Schedule 2 is not straightforward. Table A links the structure of this report to an interpretation of Schedule 2, whilst Table B explains this interpretation (N.B. this current report is an Interim SA Report, as opposed to the SA Report, but nonetheless aims to present the information required of the SA Report). Table C then presents a discussion of more precisely how the information in this Interim SA Report reflects the requirements for the SA Report.

Table A: Questions answered by this Interim SA Report, in-line with an interpretation of regulatory requirements

Questions answered		As per regulations... the SA Report must include...
Introduction	What's the plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
	What's the sustainability 'context'?	<ul style="list-style-type: none"> Relevant environmental protection objectives, established at international or national level Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
	What's the SA scope?	<ul style="list-style-type: none"> Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan The environmental characteristics of areas likely to be significantly affected Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
	What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
Part 1	What has plan-making / SA involved up to this point?	<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) The likely significant effects associated with alternatives Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan
Part 2	What are the SA findings at this current stage?	<ul style="list-style-type: none"> The likely significant effects associated with the draft plan The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan
Part 3	What happens next?	<ul style="list-style-type: none"> A description of the monitoring measures envisaged

Table B: Interpreting Schedule 2 and linking the interpretation to the report structure

Schedule 2	Interpretation of Schedule 2		
The report must include...	The report must include...		
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>	
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>	i.e. answer – <i>What's the scope of the SA?</i>
(c) the environmental characteristics of areas likely to be significantly affected;	The relevant environmental protection objectives, established at international or national level		
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	i.e. answer - <i>What's the 'baseline'?</i>	
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The environmental characteristics of areas likely to be significantly affected		
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance		
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Key environmental problems / issues and objectives that should be a focus of appraisal	i.e. answer - <i>What are the key issues & objectives?</i>	
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach')	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]	
(i) a description of the measures envisaged concerning monitoring.	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.		
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]	
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan		
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]	

Table C: ‘Checklist’ of how and where (within this report) regulatory requirements are reflected.

Regulatory requirement	Information presented in this report
a) The report must include: An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 2 (‘What’s the plan seeking to achieve’) presents this information.
b) The report must include: The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Matters (b), (c) and (d) were considered in detail at the scoping stage, which included consultation on a Scoping Report. The outcome of scoping was an ‘SA framework’, which is presented within Section 3. The SA scope is then discussed within the appraisal sections as appropriate, i.e. in light of the options and proposals that are a focus.
c) The report must include: The environmental characteristics of areas likely to be significantly affected;	As above
d) The report must include: ... environmental problems which are relevant... areas of a particular environmental importance...;	As above
e) The report must include: The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	The Scoping Report presented a detailed context review and explained how key messages from this (and baseline review) fed into the ‘SA framework’, which is presented within Section 3. Also, information on the SA scope is presented as part of appraisal work in Sections 6 and 9. With regards to explaining “ <i>how... considerations have been taken into account</i> ”, Section 7 explains reasons for supporting the preferred option, i.e. how/why the preferred option is justified in-light of alternatives appraisal.
f) The report must include: The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	Section 6 presents alternatives appraisal findings, whilst Section 9 presents an appraisal of the current early draft version of the Local Plan as a whole. All appraisal work naturally involved giving consideration to the SA scope and the various effect characteristics.
g) The report must include: The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan...	Section 9 presents recommendations but perhaps more importantly flags ‘tensions’ that can be a focus of further work ahead of plan finalisation.
h) The report must include: An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Sections 4 and 5 deal with ‘reasons for selecting the alternatives dealt with’. Section 7 explains ‘reasons for supporting the preferred approach’, i.e. explains how/why the preferred approach is justified in-light of the alternatives appraisal. Methodology is discussed at various places, ahead of presenting appraisal findings.
i) The report must include: ... measures envisaged concerning monitoring;	Section 11 presents this information.
j) The report must include: A non-technical summary... under the above headings	The NTS is presented separately.
The SA Report must be published alongside the draft plan. Specifically: Authorities... and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan... and the accompanying environmental report before the adoption of the plan...	This Interim SA Report is published alongside an early draft version of the Local Plan in order to inform the consultation and then subsequent plan finalisation.
The SA Report must be taken into account, alongside consultation responses, when finalising the plan. Specifically: The environmental report prepared pursuant to Article 5 [and] the opinions expressed pursuant to Article 6... shall be taken into account during the preparation of the plan... and before its adoption or submission to the legislative procedure.	This Interim SA Report will be taken into account when finalising the plan for publication (see Section 10).

Appendix II: The SA scope

Set out below is the SA framework in full as established in 2023 following consultation on the Scoping Report. Comments are welcome on the SA framework at the current time.

SA topic	SA objective
Accessibility	Support accessibility to community infrastructure, including by delivering infrastructure enhancements, including strategic infrastructure that benefits existing as well as new communities ('planning gain').
Air quality	Take steps to locate, design and deliver new development so as to avoid worsening air pollution and support the achievement of air quality objectives, including within air quality management areas (AQMA's).
Biodiversity	Conserve and enhance designated sites, in accordance with their significance and in line with established good practice. Take a strategic, landscape-scale approach to biodiversity, focused on ecological connectivity / networks and climate change resilience. Ensure accordance with the mitigation hierarchy (avoid, mitigate, compensate).
Climate change adaptation	Plan strategically for flood risk, mindful of climate change scenarios, and also ensure resilience to wider climate change impacts, including overheating risk. Linked to biodiversity objectives, support restoration of natural processes and the avoid actions that further constrain the natural environment's ability to respond to climate change.
Climate change mitigation	Contribute to reductions in per capita emissions from both transport and the built environment, in line with the Government's targets for net zero. Seek to realise opportunities for supporting larger scale renewable energy schemes and also strategic carbon sequestration (e.g. new woodlands).
Communities and health	In addition to ensuring good accessibility to community infrastructure, seek to realise wide-ranging other communities and health objectives (for example in terms of access to green infrastructure, supporting vibrant town centres, and addressing relative deprivation and inequalities).
Economy and employment	Meet the full range of employment land needs and more widely reflect the objectives set out in the NPPF, including the headline objective of supporting economic growth and productivity. Build on local strengths, counter any weaknesses and address the challenges of the future, including guided by strategy/policy defined at key functional scales.
Historic environment	Conserve and enhance the historic environment, with a focus on designated assets, but also non-designated assets and historic character. Consider links to landscape, place-making and other objectives.
Housing	Meet objectively assessed needs for housing and wider accommodation as far as possible. Deliver affordable housing and specialist housing / accommodation to meet needs, as far as possible, and ensure an appropriate housing mix in terms of size, type and tenure.
Land, soils and resources	Ensure efficient use of land including a focus on avoiding the loss of best and most versatile agricultural land as far as possible. Support minerals and waste planning and seek to reflect circular economy principles.

SA topic	SA objective
Landscape	Protect and enhance the character, quality and setting of valued landscapes at all scales (most notably the Chilterns AONB). Recognise links to wider objectives (e.g. biodiversity, heritage). Design development with landscape as a key factor, including by taking a strategic approach to high quality green infrastructure linking to the wider landscape.
Transport	Support the achievement of modal shift from private car use to public and active transport, including through the location and design of development. Support the Local Transport Plan, for example in respect of strategic transport infrastructure upgrades, addressing congestion hotspots (and, in turn, supporting bus services) and future mobility.
Water	Direct growth to minimise pressure on water resources and water quality, including accounting for wastewater treatment capacity and water quality hotspot areas (catchments and water resource zones). Realise opportunities for growth to support new / upgraded infrastructure.

