

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

**Note in support of targeted engagement**

**February 2026**

Quality information

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# 1. Introduction

- 1.1.1. Buckinghamshire Council is preparing the Local Plan for Buckinghamshire (LP4B) which is tasked with identifying a supply of sites sufficient to provide for objectively established development needs, as far as is consistent with sustainable development. Another key task is to establish policies to guide future planning applications aimed at ensuring schemes that reflect local priorities, within the parameters of development viability.
- 1.1.2. AECOM is leading on Sustainability Appraisal (SA) in support of the emerging LP4B. The aim of the SA process is to test the emerging plan under a 'framework' of sustainability objectives, and also to explore the merits of 'reasonable alternatives' where there is a key choice at hand. SA is a legally required process, where central requirement is to publish an SA Report for consultation alongside the draft plan that presents an appraisal "the plan and reasonable alternatives".
- 1.1.3. Buckinghamshire Council consulted on an early draft of the LP4B in September – October 2025 and an Interim Sustainability Appraisal (ISA) Report was published alongside. The aim of the Interim SA Report was to present an appraisal of the Draft LP4B and reasonable alternatives and, as part of this, the reasonable alternatives defined, appraised and consulted-on were in respect of: A) growth quantum (three alternatives); and B) broad spatial strategy (seven alternatives).
- 1.1.4. The current engagement exercise is focused on **site options**, which are essentially the building blocks for the LP4B. Whilst work at the 2025 consultation stage involved exploring broad strategy issues and options, now is an opportunity to explore the sites that are available and in contention for allocation to deliver on emerging strategy.
- 1.1.5. Following this current stage the aim will be to bring together understanding of strategic factors ('top down') and site options / site specific factors ('bottom up') to arrive at a final draft LP4B and reasonable alternatives. The final draft 'Regulation 19' version of the LP4B will then be published for consultation alongside the formal SA Report.
- 1.1.6. The aim of this report is essentially to appraise the merits of site options, both in isolation and in combination. With regards to in-combination considerations, it is important to note the following context in respect of **development needs / targets**:
  - Local Housing Need (LHN) – is 4,332 dwellings per annum (dpa) or 90,972 homes in total over the plan period (2024 to 2045). It is likely that the housing requirement (which is the number of homes that the Council commits to delivering year-on-year) will need to be set in line with LHN, but this is a matter for ongoing testing.<sup>1</sup>
  - Residual target for the LP4B – is the number of homes that the LP4B must provide for through allocations and broad locations (NPPF para 42) having accounted for existing supply from commitments (14,300 homes) and a windfall assumption (7,400 homes). It follows that the residual target figure is 69,272 homes (90,972 – 14,300 – 7,400) assuming a housing requirement set at LHN. However, there are further factors:
    - It is reasonable to assume a significant boost to supply in urban areas and around well-connected train stations in light of the Draft NPPF (2026), which proposes a presumption in favour of development in these locations. The current assumption is an additional 15,000 homes from this source of supply, which *potentially* reduces the residual target for the LP4B to 54,272, but this is a matter for ongoing testing.

<sup>1</sup> The possibility of a housing requirement set above or below LHN was considered within the Interim SA Report (2025). By way of an update, three key points to note are as follows: A) there is an acknowledged risk of unmet need from Slough and also from London, but both the Slough Local Plan and the new London Plan are some way off evidencing unmet need, let alone a level of unmet need that might be provided for through the LP4B, such that it is increasingly difficult to see a strong case for the LP4B setting a housing requirement above LHN (this is discussed further below); B) the Government proposes to imminently abolish the Duty to Cooperate, but it nonetheless remains the case that the Government expects local authorities to collaborate closely in respect of providing for unmet need (e.g. this was discussed in a hearing session of the South and Vale Local Plan examination held on 12<sup>th</sup> February 2026, and there is a hearing session on this subject as part of the Cherwell Local Plan examination due to be held on 18<sup>th</sup> February 2026); and C) the Minister for Housing, Communities and Local Government recently (February 2026) intervened to prevent publication of the Three Rivers Local Plan on the basis that the level of unmet need proposed by the plan appears to lack justification (the Minister is currently reviewing the evidence / justification).

- The residual target may also decrease due to the ‘commitments’ figure increasing ahead of plan finalisation, recognising that the Council currently faces the ‘presumption in favour of sustainable development’ (NPPF para 11) such that it is difficult to defend against planning applications, with numerous major applications currently pending that could gain permission ahead of plan finalisation.
- Conversely, there is upwards pressure on the residual target in that there may be a need for the LP4B to identify a total supply that not only meets LHN but exceeds it as a contingency for unforeseen delivery issues (‘headroom’), i.e. with a view to ensuring that the housing requirement can be delivered year-on-year (recalling that failing to deliver on the housing requirement leads to punitive measures, namely ‘the presumption’). For example, it may transpire that a high reliance on urban supply generates a need for a significant supply headroom, given the inherent delivery risks associated with urban supply (availability, achievability, viability). Similarly, a high reliance on complex strategic sites can suggest a need for a large supply headroom. However, the matter of a supply headroom is complex (there is a primarily need for a focus on supply headroom in the early years of the plan period) and so this will be a matter to revisit at the next stage, i.e. ahead of plan finalisation.
- Finally, the possibility of the LP4B setting a housing requirement above LHN cannot be ruled out (although it is an increasingly unlikely scenario, as discussed). A higher housing requirement would require a commensurately higher supply.
- Employment land – need is 218 ha and supply from commitments is 174 ha, such that the residual target figure for the LP4B is 45 ha. This residual figure can be met very comfortably, for example, Westcott is a 268 ha site where allocation for employment is a strong option. There are also several large employment site options in the Green Belt that are identified as grey belt or provisional grey belt through the Green Belt Assessment (GBA, 2026) such that allocation is a strong option, given a broad strategic case for new employment land in this area. Overall, providing for a level of employment land growth far in excess of identified needs (potentially by around 200 ha) is a clear option for the LP4B, which could represent a proactive approach including accounting for possible unmet need from Slough and elsewhere.
- Gypsies, Travellers and Travelling Showpeople – the Gypsy and Traveller Accommodation Needs Assessment (GTAA, 2025) identifies a need for 516 pitches and 30 plots in the first 10 years of the plan (2024-2034), plus further need to 2045. For context there are currently 423 pitches in Buckinghamshire, which includes 58 pitches at unauthorised sites. As such, need is very high, and it is clear that providing for need in full will be highly challenging. The emerging supply figure is 229 pitches.

1.1.7. In this context, and focusing on housing, there are three categories of site options:

- Category 1 (**Cat1**) sites – are sites that perform strongly such that there is a strong case for allocation given the strategic context. The current interactive map shows both committed and non-committed sites but focusing on non-committed sites only the total capacity is 54,200 homes, which is *potentially* sufficient to enable the housing requirement to be set at LHN (see discussion above). The Cat1 sites are all located outside of the Green Belt and fall into one of two sub-categories:
  - Strategic – these are urban extensions involving at least ~1,000 homes or new settlements able to deliver at least ~3,000 homes. Options have been considered through a New and Expanded Settlements Study (NESS) and there is currently a shortlist of 15 sites in total (see Box1.1), of which 7 are Cat1.<sup>2</sup> Supply from these 7 strategic Cat1 sites is 22,600, but this figure is subject to refinement on the basis of ongoing detailed workstreams, including in terms of delivery timescales.
  - Non-strategic – total identified supply is 31,600 (54,200 – 22,600).

<sup>2</sup> At Princes Risborough the Cat1 strategic site is an existing allocation in the High Wycombe Local Plan (2019), and at Buckingham parts of the Cat1 strategic site are also committed, including following the recently made Neighbourhood Plan.

- Category 2 (**Cat2**) sites – are located in the Green Belt but are potentially the next port of call were the decision to be taken to release land from the Green Belt. The total capacity of these sites is circa 9,000 homes and they fall into two sub-categories:
    - Grey belt – these are sites that fall within a parcel (“assessment area”) identified as grey belt through GBA (2026). Total capacity is ~4,500 homes.
    - Provisional grey belt – these sites fall within an assessment area that the GBA identifies as provisional grey belt. Specifically, these are sites assessed as not making a strong contribution to any of three key Green Belt purposes (specifically, purposes A, B and C apply for the task of identifying grey belt) but are potentially constrained in terms of NPPF footnote 7 (which the NPPF 2024 says should be a factor when identifying grey belt, but this may be subject to change, following the Draft NPPF, 2026). There are three such sites and all are strategic (suggestive of good potential to overcome footnote 7 constraints). Total capacity is ~4,500 homes.
  - Category 3 (**Cat3**) sites – are not considered suitable for allocation at the current time but are published for comment in the knowledge that the strategic context to site selection is inherently subject to change and/or new site-specific evidence can and likely will emerge. They are placed into two categories:
    - Strategic sites – six sites all located outside of the Green Belt. N.B. one of these is Princes Risborough, where rolling forward the committed strategic growth location is a Cat1 option and then additional strategic growth is Cat3.
    - Non-strategic sites in the Green Belt – there are quite a large number of such sites, and all are identified as provisional grey belt through the GBA (2026).
- 1.1.8. These three categories of site options are discussed below under the SA framework, which is essentially a list of 14 sustainability topics. Under each SA topic-specific discussion, the aim is to present a targeted appraisal of site options, accounting for the three categories of site (Cat1, Cat2 and Cat3), and also to consider how sites might be allocated in combination in order to deliver on the objectives of the LP4B.
- 1.1.9. In summary, this report is structured as follows:
- Sections 2 to 15 – present a series of discussions under the SA framework.
  - Section 16 – presents conclusions and a discussion of next steps.

#### *Box 1.1: Shortlisting strategic sites*

A shortlist of 15 strategic sites has been established through a multi-stage New and Expanded Settlements Study (NESS) workstream, and it is appropriate here to note three options that have been sifted out, i.e. such that they do not feature in the current shortlist of 15.

Firstly, the option of a strategic site to the south of Quainton (likely in the form of a standalone new settlement between Quainton and Waddesdon) was found to perform very poorly. No such scheme has been promoted to the Council, but it is considered to explore growth options that could feasibly help to unlock a new rail link between Aylesbury and East West Rail (the ‘Aylesbury Spur’, which is shown on the key diagram of the Vale of Aylesbury Local Plan, but which is not currently deliverable). A range of constraints mean that it is very difficult to envisage the potential for strategic growth here, but there is the possibility of considering growth south of Quainton in combination with growth north of Waddesdon including to deliver a bypass.

Secondly, strategic growth north of Burnham was also screened out, including because land here is *not* identified as grey belt or provisional grey belt through the GBA (2026). Other issues include proximity to Burnham Beeches SAC, complex land ownership and road connectivity.

Thirdly, the option of a new settlement at the former Oakley Airfield was screened out, noting that this is a rural area with very poor transport connectivity (the recently released DfT Connectivity Metric scores the site 19, which is very low). It is difficult to envisage either good road connectivity to M40 Junction 8a or a new motorway junction and, whilst proximity to Oxford is a plus-point, there would be a risk of problematic rat running through sensitive villages.

## 2. Accessibility (to community infrastructure)

2.1.1. The ISA Report (2025) discussed the importance of an 'infrastructure-led' approach to growth whereby growth is directed to locations with existing infrastructure capacity and/or to locations where growth can deliver new or upgraded infrastructure. This must include a strong focus on community infrastructure, which is a key issue for any local plan, including with a view to growth benefiting existing communities ('planning gain').

2.1.2. A key starting point is directing growth in line with the settlement hierarchy, and so the following bullet points consider the higher order settlements in turn:

- Aylesbury – a significant proportion of the Cat1 sites are at Aylesbury, although some are existing commitments. The key potential location for strategic growth is to the north, and then there is a Cat3 strategic site to the south that would expand upon recent and committed growth at Stoke Mandeville.

Also, Cat1 sites could deliver significant growth at locations that link to Aylesbury, most notably at Haddenham but also at Aston Clinton. Furthermore: A) at Princes Risborough a Cat1 site comprises an existing committed strategic allocation (delivery has proved challenging) and a Cat3 option would see additional strategic growth here (in support of delivery); and B) a Cheddington New Town is a Cat3 option.

Overall, a reasonably high proportion of the Cat1 supply is directed to the Aylesbury area, but there is an 'accessibility' case for higher growth. Aylesbury is an established strategic growth location (Garden Town), and there are policies and governance arrangements in place to ensure a focus on coordinated infrastructure delivery.<sup>3</sup> Having said this, transport infrastructure delivery has proved challenging and costly, with implications for wider goals, which highlights the importance of the current consultation with infrastructure stakeholders and partner organisations.

Finally, it can be noted that there is a risk of speculative planning applications being permitted under the presumption in favour of sustainable development ahead of the LP4B, potentially with sub-optimal outcomes for infrastructure delivering including community infrastructure. For example, within the Stoke Mandeville Cat3 site an application for 650 homes was refused in 2026, and to the north of Aylesbury planning applications may be forthcoming that would see expansion of Berryfields to the west and to the north (whilst the green site here would see expansion to the east).

- High Wycombe – is set to see relatively low growth, despite its position in the settlement hierarchy, on account of constraints most notably the Chilterns National Landscape (NL). This can be questioned from an accessibility perspective, in that additional growth at High Wycombe could reduce the pressure for growth at lower order settlements. However, it is noted that there is a Cat1 strategic site at nearby Bourne End, where there are potentially some accessibility opportunities, including noting an adjacent secondary school and the possibility of further enhancing the former railway line to High Wycombe as an active mode route.
- Milton Keynes – is located just to the north of Buckinghamshire and is a key regional centre. There are significant Cat1 sites adjoining Milton Keynes, plus a new settlement to the west is a Cat3 option (Beachampton). Milton Keynes is soon to submit a local plan that proposes an ambitious strategy for infrastructure-led expansion to 2050, as well as major intensification within Central Milton Keynes (CMK), plus there is the possibility of additional expansion under the Government's New Towns Agenda. As such, it will be crucially important to collaborate with Milton Keynes City Council in respect of community infrastructure capacity and also transport capacity; for example it is important to note a series of proposed Mass Rapid Transit (MRT) / metro corridors.

<sup>3</sup> For example, see: [www.buckinghamshire.gov.uk/business/strategic-growth-investment-and-regeneration/regeneration-and-economic-development/view-the-regeneration-plans-for-our-towns-and-places/our-aylesbury-regeneration-plans/](http://www.buckinghamshire.gov.uk/business/strategic-growth-investment-and-regeneration/regeneration-and-economic-development/view-the-regeneration-plans-for-our-towns-and-places/our-aylesbury-regeneration-plans/).

- Slough and London – are located just to the south / SE edge of Buckinghamshire. This area is within the London Green Belt and so there is very low supply from Cat1 sites, but there are numerous Cat2 and Cat3 sites in this area (plus there is the option of significant employment land, including data centres). The Cat2 and Cat3 sites are mostly smaller sites dispersed across lower tier settlements (Stoke Poges, Iwer Heath, Iwer, Richings Park and New Denham), which raises the possibility of infrastructure opportunities being missed / not being fully realised, although these settlements benefit from proximity and good links to Slough and London. There is a broad 'accessibility' case for growth in this area, and for ensuring coordinated growth.
- Leighton Buzzard – is located just to the east of Buckinghamshire, and land within Buckinghamshire at the edge of the town falls within the London Green Belt. There is one Cat3 site that links well to the town centre and train station. Also, there is a Cat1 strategic site at nearby Wing, which is of a scale that could be transformative for the village, such that it will be important to carefully consider infrastructure issues / opportunities, including working with Central Bedfordshire Council given links to Leighton Buzzard. There is a secondary school at Wing that appears to be in a relatively unconstrained location such that expansion could potentially be an option.
- Brackley – is located just to the north-west of Buckinghamshire and here there is a Cat1 strategic site to the east of the town. It can be noted that an appeal was very recently granted for a 700 homes to the west of the town, and this site will not deliver a primary school (but will deliver a rugby pitch), which serves to highlight the need for close collaboration with West Northamptonshire Council in respect of infrastructure capacity. Finally, it is noted that connectivity into Brackley is challenging given a dual carriageway and a river corridor (also, to some extent, an industrial area).
- Buckingham – a Cat1 site could deliver strategic growth to the south of the town, and it is notable that the Town Council recently explored this option (broadly speaking) as part of work to review the Buckingham Neighbourhood Plan. The Town Council is believed to be supportive of an infrastructure-led approach to growth, aimed at avoiding capacity issues and missed opportunities as result of piecemeal growth, which is a recent / ongoing issue locally (indeed, some parts of the Cat1 site are already committed). An ambition is also to reduce the severance effect of the A421.
- Chesham – is mostly constrained by the NL but land to the east falls outside of the NL and here there is the option of strategic growth. Specifically, there is a Cat2 strategic site and then also a nearby cluster of Cat3 non-strategic sites. A key consideration is avoiding piecemeal growth in this area with opportunities missed to leverage maximum planning gain, and another factor is challenging transport connectivity between the potential strategic growth area and Chesham town centre, including noting a steep hill.
- Amersham – there is very low potential supply, reflecting the NL constraint, and it can be noted that this is similarly the case for closely linked Little Chalfont. The town has a good local offer and benefits from good connectivity to Watford / London, High Wycombe and Chesham; hence, growth options should continue to be explored.
- Chalfont St. Peter / Gerrards Cross and Beaconsfield – can be considered jointly here given their shared location in a broad area with strong accessibility and transport connectivity credentials, and because both settlements are associated with numerous site options of a limited scale. The cluster of Cat3 sites east of Beaconsfield benefits from very good links to a town centre and train station with a good service; however, the Cat3 strategic site north east of Chalfont St. Peter is less well-linked. Coordination of growth east of Beaconsfield is an important objective, noting a risk of piecemeal planning permissions under the presumption in favour of sustainable development.
- Marlow – there is very low potential supply, including on account of the NL constraint, and, as per High Wycombe and Amersham, this strategy warrants ongoing scrutiny.
- Wendover – the existing strategic allocation at RAF Halton is a Cat1 site and then land adjacent to the west is categorised as Cat3 and could deliver comprehensive growth to the north of the town. Comprehensive growth is supported from an accessibility perspective, because the land relates well to the town centre and is adjacent to the schools hub, and because the alternative could be piecemeal growth over time.



- Princes Risborough – is the smallest of the settlements within the second tier of the settlement hierarchy, but benefits from good links to Aylesbury, High Wycombe and Oxford. There is a Cat1 site that comprises the existing committed strategic urban extension and then a Cat3 site that would expand the committed site, including with a view to addressing major delivery challenges and ensuring that objectives relating to community, transport and wider infrastructure can be achieved.<sup>4</sup>

2.1.3. Having discussed all settlements in the top two tiers of the settlement hierarchy, as well as higher tier settlements adjacent to the edge of Buckinghamshire, the following bullet points consider select settlements within the third tier of the settlement hierarchy:

- Aston Clinton – links closely to Aylesbury as well as to Wendover, Tring and wider destinations via the A41. The village has expanded in a somewhat piecemeal fashion over recent decades, and it can also be noted that two significant planning applications – which would extend recently completed schemes – having been refused over recent years. There is also the key context of the nearby strategic expansion of Aylesbury (Figure 2.1), including: significant employment growth at the Arla / Woodlands Enterprise Zone; two local centres (including primary schools and health facilities but not a secondary school); and a new sports village. Overall, there is support for growth to the north (Cat1), assuming a focus on comprehensive growth to maximise benefits.
- Chalfont St. Giles – has modest potential supply from a Cat2 site (where there is a live planning application) and a Cat3 site (where there is currently a pre-application consultation), although a Cat2 strategic site is located nearby at Chalfont St. Peter. The village is constrained, including in historic environment terms, but there may be community infrastructure issues/opportunities to explore (but the Parish Council did not flag anything through the Buckinghamshire Settlement Review, 2025).
- Great Missenden – is a third tier settlement but might alternatively be considered in combination with Prestwood, in which case the combined settlement might sit within Tier 2 of the settlement hierarchy. There is a comprehensive secondary school with a sixth form, but school children attending grammar school must travel elsewhere by bus. There is very low potential supply reflecting the NL constraint, but from an accessibility perspective there is a case for ongoing consideration of growth options.
- Haddenham – a Cat1 option involves strategic expansion in several directions, and it is important to note that the Parish Council recently held a Future Haddenham consultation that considered seven growth scenarios including a high growth scenario that would see the village transformed into a ‘strategic new town’. The Parish Council is keen to explore the possibility of growth delivering a secondary school, and another key issue is connectivity to Aylesbury. The configuration of the Cat1 site warrants scrutiny, as concentrating growth can assist with economies of scale and healthy competition between land owners. Finally, it is again important to point out the risk of sub-optimal piecemeal growth ahead of the LP4B, for example there is a pending planning application west of the railway line for 192 homes (25/02006/AOP).
- Iver – there are numerous Cat2 and Cat3 in the broad vicinity of the village (specifically across Iver, Iver Heath, Richings Park and Shredding Green), plus employment site options and a Gypsy and Traveller site option. As such, there is the possibility of piecemeal growth with opportunities missed to maximise infrastructure benefits. In turn, consideration might be given to a comprehensive long term growth masterplan for the entire south east sector of Buckinghamshire east of the A412, also acknowledging that this is a key area for employment land including data centres.
- Little Chalfont – has a good local offer and good transport connectivity, including given very close links with Amersham. There are site options, but one is committed, such potential supply can be considered modest. There are two sectors of land outside of the NL that warrant ongoing consideration, albeit both are associated with sensitivities (notably in respect of NL setting, settlement separation and heritage).

<sup>4</sup> The committed strategic site has faced delivery issues notably in respect of delivering a strategic road link. A requirement for the scheme to come forward as a single planning application has been removed, but this has not resolved the issue.

- Stoke Mandeville – might alternatively be considered the southern extent of Aylesbury. There is committed strategic growth, but now there is an option (Cat3) to complete the southern expansion of Aylesbury whilst maintaining a countryside buffer to Wendover and the Chilterns escarpment including Coombe Hill. The area performs very strongly in terms of the Government's connectivity metric, as discussed further below.
- Stokenchurch – a modest Cat1 site is an existing commitment, plus there is the option of some new employment land noting good connectivity to the M40 (but the village is constrained by the NL). There are not known to be any village-specific infrastructure issues / opportunities that might be addressed / realised through further growth.
- Wing – has already been discussed above as a village associated with a growth opportunity, subject to further work including discussions with Central Beds.
- Winslow – there is significant committed growth and now the option (Cat1) to boost planned growth significantly including with a focus on maximising infrastructure benefits. Winslow is a rural settlement but benefits from East West Rail connectivity.
- Wooburn and Bourne End – is a relatively large tier 3 settlement, with a local offer that includes a secondary school, plus High Wycombe and Beaconsfield are nearby and there is a train link to Marlow and Maidenhead. As such, there is a case for growth from an accessibility perspective, albeit there are inherent challenges relating to the Wye valley and the River Thames (landscape, heritage, transport). The Cat2 strategic site is associated with a steep hill, such that it could prove challenging to progress, and so wider growth options warrant ongoing consideration.

2.1.4. Having discussed settlements in the three tiers of the settlement hierarchy, the following bullet points consider select smaller settlements with significant potential supply:

- Newton Longville – has modest potential supply but is notable on account of proximity to Milton Keynes including strategic expansion areas. Potential supply at the edge of Milton Keynes is focused along the key transport corridors to the west (A412) and the east (A4146), but the possibility of strategic growth at Newton Longville might be explored as a comparator, notwithstanding current poor transport connectivity (also heritage value / constraint). It is noted that the village primary school is quite large and is in a land-locked location, such that expansion is likely not an option.
- Stoke Hammond – is located nearby and in close proximity to a potential strategic growth option at the edge of Milton Keynes. There is significant potential supply spread across four sites, hence it will be important to ensure a strategic approach to growth in this area (Stoke Hammond linking to Milton Keynes).
- Tingewick, Padbury and Gawcott – are three villages in proximity to Buckingham that all have significant potential supply. There will be a need to consider primary school capacity and wider infrastructure issues/opportunities including cycle connectivity.
- Steeple Claydon – is notable as a distinctly rural village that has seen recent growth and where there is now a Cat3 strategic site that would be transformative for the village. There are inherent concerns from an accessibility perspective, but concerns are potentially reduced once account is taken of the location of the Steeple Claydon Cat3 site at the centre of a collection of four site options (with Calvert to the west, Buckingham to the north and Winslow to the east). There is a clear opportunity for a strategic approach to growth in this sector of Buckinghamshire, including with a focus on strategic community infrastructure, public transport and cycle connectivity.
- Long Crendon and Stone – are two villages with significant potential supply located to the west of Aylesbury and in proximity to Haddenham (discussed above) as well as Thame in Oxfordshire (and, in turn, there is relative proximity to Oxford). Coordinated growth might include a focus on the A418 as a public transport corridor.
- Eddlesborough – has significant potential supply and is notably located on the border with Bedfordshire, in proximity to Luton, hence cross-border collaboration is key.

- Villages in the National Landscape – the strategy of avoiding growth in the NL warrants scrutiny from an accessibility perspective, because there may be growth-related community infrastructure issues and opportunities. One matter for consideration is a national trend of village primary schools struggling to maintain pupil numbers.

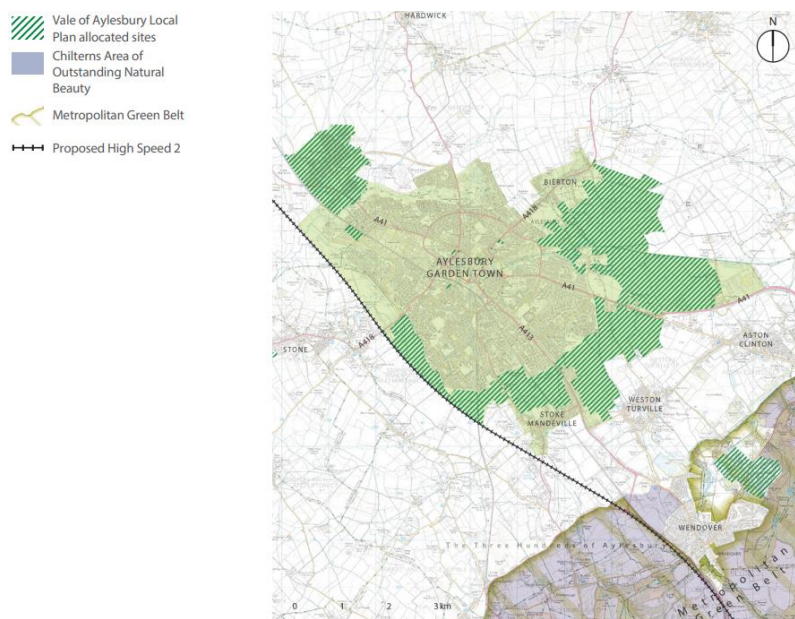
2.1.5. Finally, there are three new settlement options, all of which are categorised as Cat3:

- Calvert – has been discussed in the past as a potential new town location including as this is arguably a strategic location between Bicester (a growth town) and potential growth locations in Buckinghamshire (as discussed). However, this is a rural area with poor road connectivity and there are a range of barriers to effective masterplanning including HS2 works and a large area that is an operational landfill.
- Beachampton – a key issue is close collaboration with Milton Keynes City Council including because further expansion of Milton Keynes to the west is not currently a preferred option but is potentially an option for ongoing consideration. This area is accessed by rural lanes such that transport upgrades would be costly.
- Cheddington – benefits from a train station, but this is a rural area with road connectivity challenges, including noting canals and flood risk zones. As well as north-south connectivity via the railway, Luton to the east is also in relative proximity.

2.1.6. In **conclusion**, the discussion above has considered key aspects of the potential supply across three categories of site option from a perspective of seeking to ensure that growth is directed in such a way that community infrastructure issues are addressed and opportunities realised. The focus on strategic sites (as identified and examined through the NESS) and several larger non-strategic HELAA sites is broadly supported, but the new settlement options (all categorised as Cat3) are all likely associated with delivery and viability challenges. Whilst new settlements can represent an opportunity to deliver new strategic community infrastructure alongside new homes, there are often challenges given the costs of required transport infrastructure upgrades.

2.1.7. Moving forward, and informed by the current consultation, it will be important to: A) carefully consider viability and delivery assumptions; B) consider clusters of strategic growth options within sub-areas including transport corridors; C) collaborate with neighbouring local authorities in respect of infrastructure capacity; D) consider growth-related issues and opportunities across villages in the north of Buckinghamshire; E) scrutinise the merits of low growth at several locations in the south of Buckinghamshire; and F) consider the possibility of targeted modest growth in the National Landscape.

*Figure 2.1: Committed growth around Aylesbury<sup>5</sup>*



<sup>5</sup> See the [AGT Vision 2050](#) produced by the Aylesbury Garden Town Partnership

### 3. Air quality

3.1.1. The key matter here is ensuring that spatial strategy / site selection aligns with vision-led transport planning principles, which the NPPF defines as: *“an approach to transport planning based on setting outcomes... based on achieving well-designed, sustainable and popular places, and providing the transport solutions to deliver those outcomes as opposed to predicting future demand to provide capacity (often referred to as ‘predict and provide’).”* Whilst there is a stand-alone ‘transport’ topic heading below, this current section is an opportunity to discuss some key issues where of relevance to air quality.

3.1.2. Taking broad sub-areas in turn:

- North of Buckinghamshire – air quality is not a widespread or major issue, with no Air Quality Management Areas (AQMA)s<sup>6</sup> defined in this part of Buckinghamshire, nor are there any in Brackley, Milton Keynes or Leighton Buzzard. There is an AQMA in the centre of Bicester, specifically along the A4421, which is of relevance to growth locations in Buckinghamshire (most notably Buckingham), but it can be noted that strategic growth is proposed for Bicester with the aim of addressing transport/traffic issues, including by completing the ring road. Further considerations are:
  - Buckingham – traffic through the historic core / centre of Buckingham is known to be a significant issue, including in terms of environmental quality, health and road safety. The NESS site to the south of the town could likely deliver an important new road link, essentially by-passing the bypass, but it is not clear what benefits there would be for town centre traffic. In turn, there is a need to question the implications of strategic growth at Brackley (also noting the emerging West Northants Local Plan; see Figure 3.2) for traffic through Buckingham, including potentially in terms of creating problematic air quality (but there is no clear risk of an AQMA).<sup>7</sup> Finally, it is important to note a recently delivered cycle link to Winslow (East West Rail).
  - Milton Keynes – whilst air quality is not a major issue there are traffic congestion hotspots that will need to be carefully considered given the potential for growth within Buckinghamshire to the west and south of the City. The emerging Milton Keynes Local Plan (MK2050) seeks to direct growth in line with vision-led transport principles, informed by MK Strategy 2050 and including with a focus on Mass Rapid Transit (MRT) corridors (Figure 3.1), hence sub-regional coordination is key.
- The Aylesbury area – there is likely to be a high growth strategy in this area (committed growth at Tring is also noted) and there is likely an opportunity for growth to align with vision-led transport planning principles, given the work that has been ongoing through the Aylesbury Garden Town programme. A key issue is broadly east-west movements via the A413 and A41 and there is an opportunity for growth to deliver solutions. Further considerations are: A) an issue for Haddenham is traffic through the village of Stone, plus the River Thame is a barrier to northbound movements (if traffic through villages is to be avoided); B) at Wendover growth to the north east is challenging in transport terms because this area is separated from the A413 by the canal, town centre and NL, plus growth at Aston Clinton and Tring (also potentially Cheddington) must factor in; C) the Cheddington new settlement Cat3 option benefits from rail connectivity, but this is a rural area with challenging road connectivity; D) traffic between Bicester and Aylesbury (via Westcott) passes through Waddesdon; and E) there is a need to note a blanket AQMA covering much of Oxford and, in this regard, the proposal to discount the option of an Oakley new settlement is supported.

<sup>6</sup> A map of AQMAs is available [here](#), and there is also a dedicated [website](#) for Buckinghamshire where that also shows the locations where air quality is monitored (which is an indication of locations where air quality is a potential concern).

<sup>7</sup> It is important to note that strategic growth locations will come forward over time and air quality concerns are reducing nationally year-on-year due to the EV switch-over, albeit EVs do generate particulate pollution on account of their weight.

- Villages in the National Landscape – there is a clear transport case to be made for restricting growth at rural villages, including in the Chilterns where road connections are limited (e.g. narrow rural lanes). However, on the other hand, modest growth at villages can help with maintaining local services and facilities, thereby potentially minimising the need to travel, and can also potentially assist with maintaining or improving bus services. Great Missenden / Prestwood might be considered as a growth location from a transport perspective, notwithstanding the NL constraint, given a good local offer and very good transport connectivity. It can also be noted that Great Missenden is set to be linked by the Buckinghamshire Greenway.
- Marlow – there is a town centre AQMA and it might be said there are inherent traffic challenges on account of the River Thames corridor and a historic town centre that is a popular destination. In this light there is support for likely low growth from an air quality perspective, notwithstanding the town benefits from good bus links to High Wycombe, plus the Donkey Line is a rail link to Bourne End and Maidenhead.
- High Wycombe – there are a series of AQMAs along several road corridors, partly reflecting the steep topography and its influence on the historic built form. As such, there is support for the likely low growth strategy from an air quality perspective, including noting that all potential growth locations are some distance from the town centre and railway station, plus steep topography is a barrier to cycling (but it can also be noted that there is a current electric scooter trial scheme).
- Bourne End – the Cat2 strategic site here is likely challenging in transport terms, given: to the west connectivity is via Bourne End (not necessarily a major issue) and the A404 / A4155 interchange (potentially more of an issue, noting Marlow Film Studios and aforementioned traffic issues affecting Marlow); to the south connectivity is via Cookham Bridge, albeit this does not necessarily translate into an air quality concern; and to the north connectivity is via the Wye Valley settlements, the problematic A40 corridor into High Wycombe and also Beaconsfield Old Town.
- Beaconsfield – there is support for strategic growth to the east (a collection of Cat3 sites) given the lack of an AQMA, good road and rail connectivity and a good local offer within walking distance. Further considerations are: A) the Beaconsfield Relief Road opened in 2022; B) M25-bound traffic via Chalfont St. Giles is potentially a concern; and C) the M40 is a source of noise pollution, although there is typically good potential for mitigation and the market factors in this constraint to some extent.
- Chalfont St. Peter – the potential strategic growth location to the northeast must be carefully considered from a transport and traffic perspective, given road connectivity, distance to a train / tube station, distance to a higher order centre and distance / connectivity to services and facilities in Chalfont St. Peter, for example the comprehensive secondary school is not easily accessed. However, the Local Cycling and Walking Infrastructure Plan (LCWIP) discusses potential new strategic cycle links, including to Amersham (the Buckinghamshire Greenway) and Little Chalfont.
- Gerrards Cross – benefits from a good local offer (although there is no state secondary school) and very good road and rail connectivity (traffic through the centre is an issue, but some potential growth options give rise to limited concerns in this respect). The primary site option (Cat3) is located within walking distance of the town centre and railway station, and further growth options should continue to be explored.
- South of Buckinghamshire – a blanket AQMA covers the Ivers as well as London Borough of Hillingdon, hence it will be important to give strategic consideration to growth in this area from an air quality perspective (see discussion above regarding the possibility of a strategic masterplan / area-specific spatial strategy). Perhaps a primary consideration is ensuring good links to the Elizabeth Line stations.

### 3.1.3. Final considerations are as follows:

- **Urban allocations** – there is broad support for maximising urban regeneration opportunities from a transport and, in turn, air quality perspective because a focus of growth in urban areas can minimise the need to travel and maximise movements by 'sustainable transport' modes. However, there is also a need for a degree of caution in respect of growth within town centres that experience problematic air quality. Three considerations are: 1) in Aylesbury there are two Cat1 sites adjacent to the AQMA at the A413 / Stoke Road junction; 2) in High Wycombe there are several Cat1 sites adjacent to an AQMA (but none significantly intersecting); and 3) in Marlow one of the Cat1 sites comprises a town centre car park (with town centre traffic an existing issue).
- **Employment land** – must be carefully considered from a transport perspective, albeit issues vary by type of employment land. A primary concentration of potential supply is in the southeast of Buckinghamshire where there is a blanket AQMA, although sites (mostly Cat2) are mostly well-linked to the strategic road network. One of the sites adjacent to Slough is less well linked to the strategic road network but is understood to be under consideration for use as a data centre. The other key employment growth location is then Westcott, which is well positioned on the A41, but this is a rural location hence it would be crucial to ensure a bus service that is attractive to commuters.
- **Growth quantum** – there is a clear case for setting the housing requirement at least at LHN because generating unmet need is inherently problematic in transport terms and, in turn, problematic for air quality. This is because: A) providing for housing need distant from where the need arises leads to problematic travel patterns; and B) generating unmet need without knowing where it will be provided for (and when) leads to a challenge for long term strategic transport planning.

3.1.4. In **conclusion**, it is clear that there will be a need for further work to ensure a spatial strategy / suite of proposed allocations that aligns with vision-led transport principles. It is difficult to suggest a possible need for work specifically focused on air quality, recognising the trend nationally (from experience where air quality assessment work is undertaken as part of local plan-making few issues are flagged once the timing of growth is taken into account), but some targeted work could be appropriate.

Figure 3.1: The indicative proposed MK Metro (from an MK2050 *Topic Paper*, 2025)

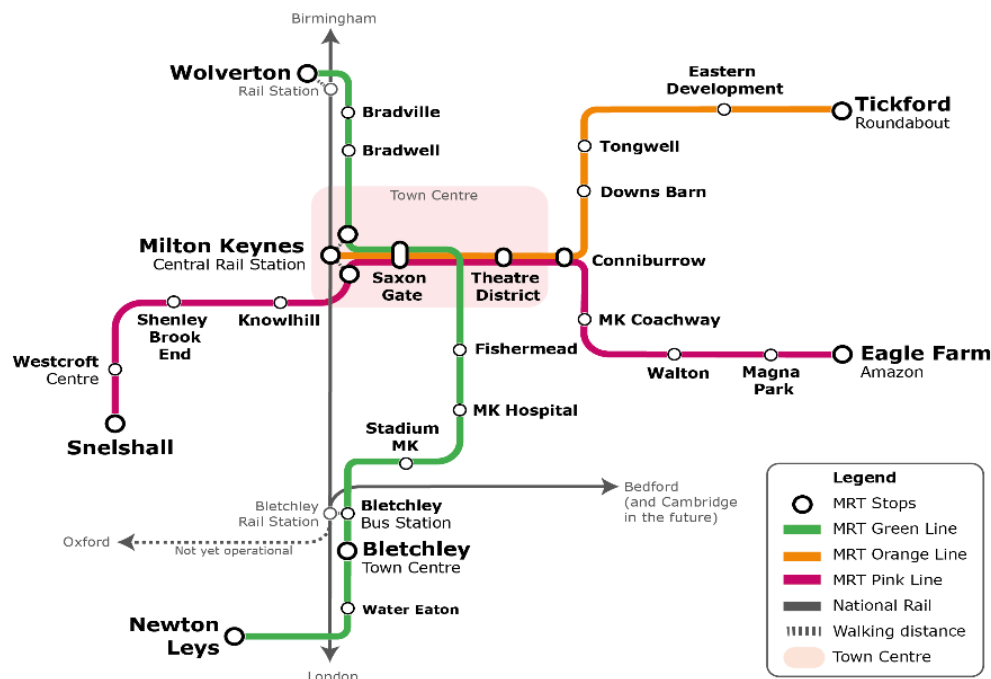
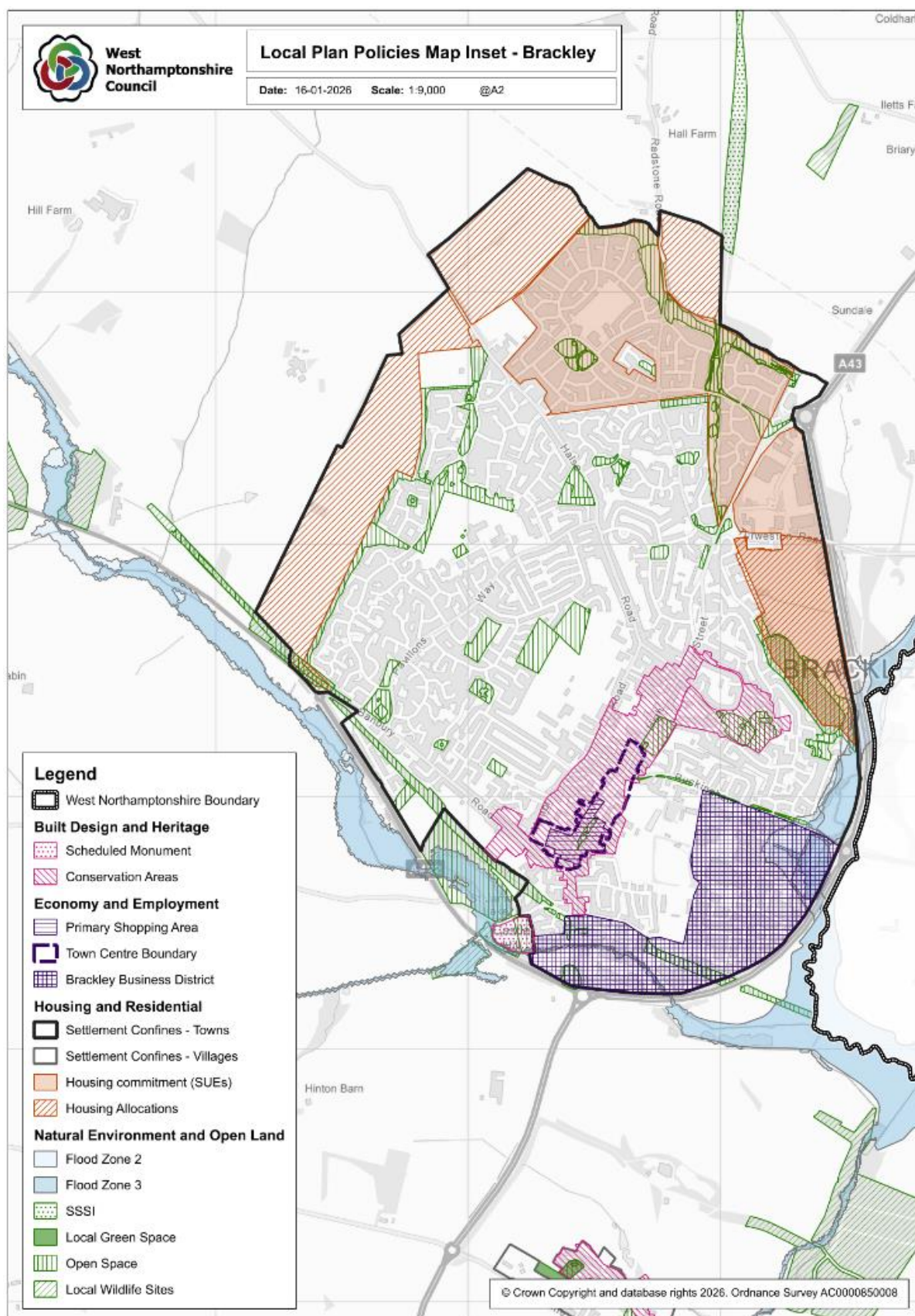




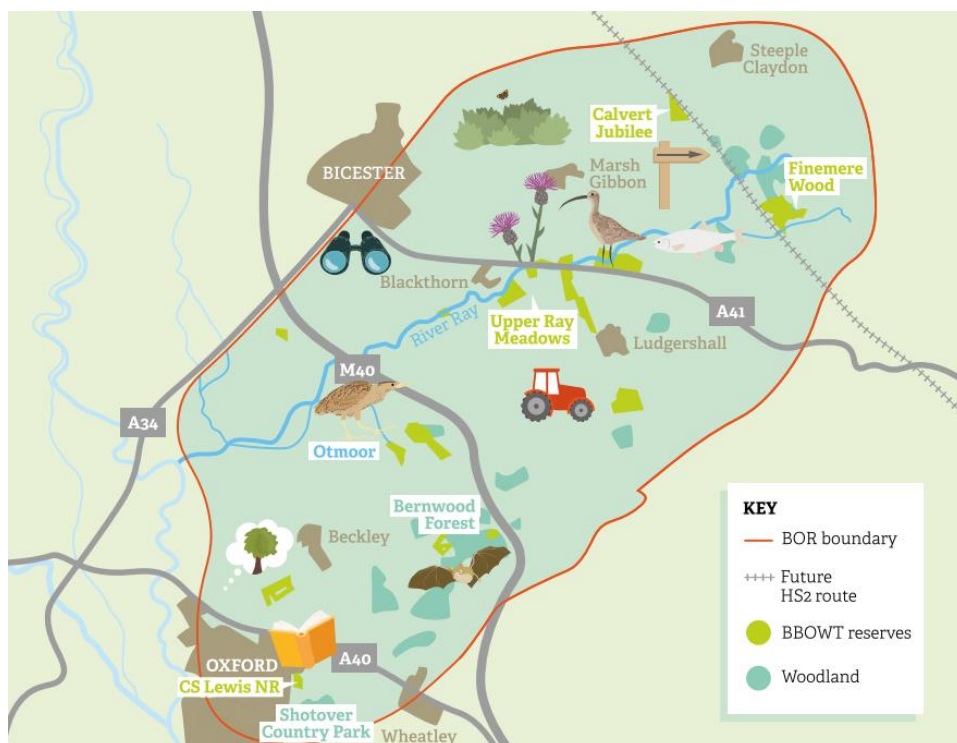
Figure 3.2: The key diagram for Brackley from the emerging West Northamptonshire Local Plan (2026); presented as an example of growth through neighbouring local plans that must factor in



## 4. Biodiversity

- 4.1.1. North of Aylesbury the potential supply gives rise to notably few concerns from a biodiversity perspective. The key matter likely relates to the Cat3 option of a new settlement at Calvert, given a close association with a significant cluster of nationally designated SSSI woodlands, which themselves form the northeast extent of a nationally significant cluster of woodlands stretching down to Oxford, which is a key feature of the Mid Vale Ridge National Character Area (NCA) and links closely to the important River Ray corridor. However, a new settlement located to the west of the woodlands complex would not necessarily generate a major concern, and strategic growth here, as well as at nearby Steeple Claydon (Cat3), could support targeted investment / enhancement.
- 4.1.2. One other consideration is the Cat1 site southwest of Milton Keynes that would extend the committed Shenley Park strategic site, as this would close the gap between Shenley Park / the edge of Milton Keynes and the Whaddon Chase ancient woodlands.
- 4.1.3. Moving to the south, it can be noted that the *discounted* Oakley new settlement option is located adjacent to Bernwood Forest, which is at the heart of the aforementioned cluster of ancient woodlands extending out north-eastwards from Oxford to Calvert. Were there calls for a new motorway junction this could well lead to a conflict with biodiversity objectives. Furthermore, it can be noted that the Westcott strategic employment land option is also associated with the aforementioned network of woodlands, but there are fewer concerns here given distance to a SSSI.

Figure 4.1: The Bernwood Forest and River Ray Living Landscape



- 4.1.4. Moving east, Aylesbury and Haddenham are associated with low biodiversity constraint, and there could be potential to deliver targeted enhancements to the River Thames corridor, along which there is limited priority habitat and limited accessibility in places. One consideration is black poplar trees in hedgerows, which are a priority species.
- 4.1.5. The next matter for consideration is the high potential supply to the north of the Chilterns escarpment, given the very high density of nationally and internationally designated woodlands in this area. In particular, attention focuses on Wendover, Aston Clinton and Cheddington, given proximity to the Ashridge SSSI component of the Chilterns Beechwoods SAC, which is highly sensitive to increases in recreational pressure.



- 4.1.6. However, good progress is being made on delivering a network of Suitable Alternative Natural Greenspaces (SANGs) to mitigate impacts, and strategic sites can often deliver a SANG; for example, a committed strategic site at Tring will deliver a SANG. In Buckinghamshire there are recently permitted SANGs at Kingsbrook Meadows, Aylesbury, and at Bell Lane, Little Chalfont, with credits now available to support growth.
- 4.1.7. Elsewhere in this area, including at Princes Risborough, potential strategic growth locations are in proximity to wider components of the Chilterns Beechwoods SAC, but recreational pressure is currently (subject to ongoing monitoring) less of a concern, such that there are not strict requirements around SANG. In this area there are many less-sensitive accessible woodlands that likely serve to absorb recreational demand.
- 4.1.8. Further potential strategic options of note in the vicinity of the Chilterns are as follows:
- Wendover – at the western edge of the potential strategic growth option (Cat3) is a stream corridor and some wetland habitat that links closely to a SSSI, plus the canal corridor has biodiversity value (but is not nationally or locally designated). There would likely be good potential to mitigate impacts through onsite green/blue infrastructure.
  - East of Chesham – is subject to limited biodiversity constraint (the town is distant from SSSIs) but is within the Ashridge SSSI (Chilterns Beechwoods SAC) 12.6km zone of influence such that there is a requirement for SANG to mitigate recreational pressure.
  - High Wycombe – the strategic employment land option at Wycombe Air Park is adjacent to a SSSI woodland, but concerns are limited on account of the current use of the site (an airfield) and the proposed use (employment). Also, there is a Cat1 residential option in the Wycombe Marsh area that largely comprises priority habitat and is largely surrounded by ancient woodland, but this is an existing allocation.
  - Bourne End – the Cat2 strategic site has limited onsite or adjacent constraint, but an issue is relative proximity to Burnham Beeches SAC, where there is a requirement for SANG within a 5.7km zone of influence. The site is quite steeply sloping which could create a challenge for delivering SANG; however, one possibility to explore could involve a focus on working to improve accessibility to woodlands in the vicinity.
  - East of Beaconsfield / west of Gerrards Cross – this area is associated with significant potential supply (Cat2 and Cat3) and there is a high density of woodland, although much is associated with former parklands such that it is not ancient woodland, and very little is locally designated let alone nationally designated. There is good potential to draw upon woodland to frame and contain growth, and again there might be a focus on growth delivering targeted enhancements and improved accessibility. Finally, ahead of any allocations in this area there would be a need for Habitats Regulations Assessment (HRA) to consider potential impacts to Burnham Beeches SAC in terms of recreational pressure (there would likely be good potential to mitigate via SANG); and air quality (specifically traffic to/from Slough and the M4 via the A355).
  - Northeast of Chalfont St. Peter (Cat2) – there is a degree of onsite and nearby constraint, but again there are few concerns in respect of designated sites. There is a large SSSI woodland to the west of Chalfont St. Giles, but the woodland is quite well-managed for access, and recreational pressure is not known to be problematic.
- 4.1.9. Finally, with regards to the south of Buckinghamshire, the belt of land between Cliveden and Iwer Heath via Stoke Poges is associated with a very significant concentration of ancient woodland and heathland habitats, and then to the northeast are the corridors of the Alder Bourne and the River Misbourne – both important chalk streams – and their confluences with the River Colne (itself a highly significant asset). Also, it is important to note that bat foraging is a ‘landscape scale’ constraint across this area. However, there are also some areas of lower / limited constraint, notably around Iwer and Ritchings Park but also elsewhere directly around the edge of Slough (assuming SANG capacity).
- 4.1.10. Taking sub-areas in turn:

- West – there is support for the modest potential supply (Cat3), but a large site option at Burnham is of note. Here the landowner / promoter has developed an initial concept masterplan that does include a significant new area of parkland, but there would be a need for further work to confirm that this meets the standards required of SANG.
  - Farnham Royal/Common – two small Cat3 sites include significant priority habitat.
  - The Ivers and Richings Park – there is significant potential supply (Cat2 and Cat3) which mostly generates limited biodiversity concerns, but expansion to the west of Iver Heath would be adjacent to Black Park (where there are two SSSIs, but also extensive accessible greenspace that is not nationally or locally designated).
  - Land in the vicinity of the M40 / A413 junction – the significant employment land options in this area are closely associated with the three aforementioned river corridors along which there are four SSSIs in total (some not currently in a favourable condition).
- 4.1.11. In **conclusion**, in many respects there is support for the distribution of potential supply options, and the strong focus on strategic sites, from a biodiversity perspective. However, there is a need for ongoing scrutiny of a number of the potential supply options, notably those: A) associated with the Bernwood Forest and River Ray Living Landscape; B) to the north of the Chilterns Escarpment including given sensitivities relating to the Chilterns Beechwoods SAC; C) at Wendover noting Weston Turville Reservoir SSSI; D) at Bourne End and Beaconsfield given proximity to Burnham Beeches SAC; and E) in the vicinity of the confluence of the Rivers Misbourne, Alder Bourne and Colne. Also, there is a need for an ongoing focus on directing growth with a view to realising biodiversity opportunities via targeted investment. For example: in the north of Buckinghamshire there might be a focus on growth locations that deliver enhancements to the Bernwood Forest, the Padbury Brook corridor and/or the River Thames corridor; and, in the south of Buckinghamshire, there might be a focus on the Wye Valley, the Misbourne and Alder Bourne chalk stream corridors (both are a focus of existing initiatives), woodland enhancement (and improved accessibility) and/or heathland creation. Work should be informed by the Local Nature Recovery Strategy.

## 5. Climate change adaptation

- 5.1.1. Focusing on flood risk, the following bullet points consider matters in a broad order of significance, from more to less significant:
- New Denham – there is a large employment option (Cat2) here very strongly associated with land at the confluence of the Alder Bourne / Colne Brook / River Colne. Fluvial flood risk zones cover a high proportion of the site area, hence there will be a need for careful consideration of both onsite and downstream flood risk.
  - Aylesbury – strategic growth options to the north of Aylesbury (Cat1) are closely associated with a flood risk zone, but it will likely be possible to avoid flood risk zones in practice through without having to compromise significantly on wider masterplanning objectives. To the east is then a Cat1 option that is an existing allocation adjacent to flood zones and upstream of significant flood risk affecting the urban area.
  - Bourne End – the Cat2 strategic site is associated with the steep valley side of the River Wye and there is significant flood risk affecting Bourne End a short distance downstream. Sustainable Drainage Systems (SuDS) would likely have to be a priority masterplanning consideration, but there might also be competing priorities, e.g. a desire to focus housing on lower land within the site to minimise landscape impacts.
  - Urban regeneration and intensification – a number of Cat1 sites proposed for residential or a mix of uses fall within a fluvial flood risk zone, with attention particularly focusing on sites under consideration for residential (only a small number of sites), as mixed use site will typically have non-residential uses on the ground floor, thereby reducing flood risk concerns. Whilst there is wide-ranging support for maximising supply within urban areas, and there is good potential to mitigate flood risk, there is a need for caution in respect of intensifying the use of sites that have historically been seen as appropriate for low intensity uses on account of flood risk.

- North of Slough – two employment site options here (Cat2 and Cat3) intersect flood zones (also noting likely access points) and there is nearby downstream flood risk.
- Cheddington – there are some notable areas of fluvial and flood risk intersecting the Cat3 new settlement option, and this is notably the watershed of the Thame and Ouzel catchments, with some flood risk downstream affecting the centre of Leighton Buzzard.
- Richings Park – there is some modest surface water flood risk affecting two of the site options here, and, in both cases, this will be a key factor for masterplanning, including noting that one of the sites (Cat3) is also constrained by the adjacent M25.
- Stoke Poges – there is a partial brownfield site identified as an option for mixed use development (Cat3) that significantly intersects a surface water flood risk zone. However, there is likely good potential to avoid built form in the flood risk zone.
- Steeple Claydon (Cat3) and Winslow (Cat1) – there is a network of flood zones associated with the Padbury Brook, but these are unlikely to hinder effective masterplanning, and there might be potential to draw upon the flood risk zones as part of a green / blue infrastructure strategy and to frame growth. More broadly, there is the potential for a high growth strategy within the catchment of the River Great Ouse (of which the Padbury Brook is a tributary) hence there could potentially be opportunities to explore around strategic flood water attenuation or wider catchment management.
- Haddenham – this is the River Thame catchment (as per Aylesbury), such that there is again a need to consider growth locations in combination, with a view to avoiding issues (downstream flood risk) and potentially realising opportunities.

- 5.1.2. In **conclusion**, it is clear that flood risk has fed in strongly as part of the work completed to date that has led to the current shortlist of site options (placed into three categories). Moving forward, there will be a need for further work to confirm that onsite flood risk can be avoided or mitigated having accounted for use mix, masterplanning and viability assumptions. The Environment Agency will wish to comment in detail through the current engagement exercise, for example in respect of: A) certain employment land options, particularly at New Denham; B) flood risk affecting Aylesbury town centre and Bourne End; C); and urban regen / intensification options.

## 6. Climate change mitigation

- 6.1.1. Focusing on per capita (rather than area-wide) greenhouse gas emissions from the built environment (rather than from transport, which is the focus of standalone discussion below), a priority is to direct growth to locations with strong development viability or otherwise where there is a locational decarbonisation opportunity.
- 6.1.2. In particular, there is a need to support sites well suited to delivering ‘net zero carbon development’ and, as part of this, ensuring that net zero is: A) carefully defined (including accounting for the question of operational emissions versus ‘whole lifecycle’ emissions including ‘embodied’ emissions in buildings and infrastructure); B) measured using an industry best practice metric (i.e. potentially the ‘energy based’ metric favoured by most industry specialists over the Buildings Regulations metric); and C) achieved in line with the energy hierarchy (including with offsetting as a last resort).
- 6.1.3. Smaller and medium-sized greenfield sites can be well placed to deliver ambitious net zero carbon developments, but also potentially large-scale strategic sites, where there can be opportunities to masterplan for energy infrastructure, e.g. battery storage. Also, strategic scale schemes are often ‘flagship’ projects that come under considerable scrutiny including in terms of decarbonisation, albeit there are invariably many competing strategic priorities, and scrutinising decarbonisation merits can be complex.
- 6.1.4. Having made these introductory remarks, points to make regarding the potential supply options (in respect of per capita built environment decarbonisation) are as follows:

- In the north of Buckinghamshire there is a focus on large-scale strategic sites which may represent a built environment decarbonisation opportunity. However, there will be competing masterplanning and funding priorities, with a key consideration likely the cost of delivering major transport infrastructure upgrades. It follows that there must be a strategic approach taken to infrastructure planning across strategic sites / growth locations in combination, particularly along road and rail corridors.
  - It will also be important to work closely with land-owners / site promoters, including identifying those where land-ownership is potentially challenging with implications for masterplanning and/or viability, with a key issue being where land ownership is fragmented. None of the strategic site options are thought to be in public ownership, but Steeple Claydon and Stoke Mandeville are understood to benefit from a single primary landowner. It can be noted that Hemel Garden Communities is a nearby proposed large-scale strategic growth location where the first of nine established key principles is: “Land value capture for the benefit of the community”.
  - Given the potential or likely scale of growth in this area – not only within Buckinghamshire but also noting high growth locations elsewhere in neighbouring authorities, including at Bicester, Brackley and Milton Keynes – a feasible opportunity could relate to a collaborative approach to offsite modern methods of construction.
  - It is not clear that across the existing committed strategic locations there is a strong focus on net zero development, which serves to highlight scope for this issue/opportunity to move up the agenda, aimed at avoiding opportunities missed.
    - As just one example, the recent Future Haddenham consultation did not include a focus on decarbonisation / net zero development (although the consultation was focused on stakeholder organisations, of which there are few with a strong focus on net zero development in the context of plan-making).
    - This can be compared to Bicester, where the original intention was to deliver strategic growth as a net zero ‘ecotown’ (but there have been delivery challenges and the concept has now evolved) and Hemel Garden Communities, where the established principles make (brief) reference to ‘zero carbon technologies’.
  - In the north of Buckinghamshire there is a significant emphasis on smaller sites at villages that will typically benefit from strong development viability with positive implications for the potential to deliver net zero carbon development.
  - Focusing on the south of Buckinghamshire, development viability is notably strong in some areas, which is potentially suggestive of an opportunity to deliver net zero development to an ambitious standard (alongside delivering on wider objectives with cost implications). Also, in some areas there may be lower infrastructure costs associated with growth, although this is a high level suggestion made with limited certainty, recognising that existing infrastructure may be at or reaching capacity.
  - In the Slough / Ivers area the high demand for datacentres such that a strategic approach might be taken to delivering one or more ‘heat networks’ that make efficient use of waste heat, potentially to heat new communities (see a recent report [here](#)).
  - At the time of writing the Draft NPPF proposes to end the practice of requiring net zero development (or otherwise requiring standards that go beyond those set out in Building Regulations) through development management policies. This serves to highlight the key importance of realising opportunities through spatial strategy / site selection. This essentially represents a ‘no regrets’ approach as opposed to placing false comfort in DM policies that risk not being fully implemented on viability grounds.
- 6.1.5. In **conclusion**, whilst none of the supply options are known to represent a particular built environment opportunity, moving forward: A) site promoters are encouraged to identify site and scheme specific opportunities; and B) there could be a focus on identifying key built environment decarbonisation issues and opportunities to inform final decision-making in respect of broad spatial strategy and site selection.
- 6.1.6. With regards to the broad strategic choices open to the local plan:

- Choice of strategic sites – landownership should factor in strongly as a site selection criterion given implications for viability and smooth delivery, and, in turn, potential to take an ambitious approach to built environment decarbonisation alongside delivering on wider objectives. It is also important to ensure healthy competition between site promoters, aimed at maximising land value capture. Finally, whilst the focus of discussion in this section has been on built environment decarbonisation, it is also the case that the strategic site options vary considerably in terms of potential to deliver on vision-led transport objectives, as discussed above and as discussed further below.
- Green Belt – strong development viability may be suggestive of broad strategic built environment decarbonisation case for ensuring that a good proportion of growth is directed to locations in the Green Belt, and one other consideration is the possibility of one or more heat networks linking waste heat from datacentres to communities. Again, whilst the focus here has been on built environment decarbonisation, there is also a need to consider transport decarbonisation, and in this respect, there is likely quite a strong case for ensuring Green Belt does not overly constrain growth strategy.

## 7. Communities and health

7.1.1. It is difficult to comment on the merits of the potential supply options at this current stage. However, there are a number of high level points:

- 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. The potential supply options serve to highlight an opportunity for a strong focus on strategic growth locations.
- 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 through the lens of the LP4B, can be of strategic importance for smaller settlements, i.e. villages. A number of 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.
- New settlements – can tend to be favoured by existing communities, hence the approach of placing all three new settlement options into Cat3 can be questioned.
- 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.
- Traffic congestion is often a key issue for communities. There are a number of identified hotspot areas, including at Aylesbury and Buckingham, with it broadly being the case that in the north of Buckinghamshire traffic funnels through a small number of road corridors that often pass through settlements. However, there are also hotspot areas in the south of the Buckinghamshire despite a denser network of road corridors, including on account of barriers to movement (topography, woodlands, rivers).
- Health facilities – it is understood that health infrastructure capacity is key issue; however, it is challenging to avoid issues and realise opportunities through spatial strategy and site selection because aligning with NHS policy is challenging and because issues relate to factors other than the availability of sites for facilities. 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. If any strategic site options could be identified as a location where there is a confirmed opportunity to deliver new health infrastructure (e.g. a health hub) then this would likely factor in strongly as part of site selection work ahead of plan finalisation.

- 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, it is important to recognise that urban / previously developed sites often face viability challenges that can hinder the ability to deliver on objectives relating to community infrastructure, transport, urban realm etc.
  - Remote sites – whilst there can be pressure to redevelop previously developed land not linked to a settlement for residential there is a need to recognise that the new community may have limited potential to walk or cycle to services and facilities. One site option of note is located between Chalfont St. Giles and Chalfont St. Peter (Cat3).
  - Relative deprivation – the recently released Index of Multiple Deprivation (IMD, 2025) shows that there are hotspots of relative deprivation in a number of larger towns. It is important to give ongoing consideration to addressing relative deprivation via growth at High Wycombe (where there is low identified potential supply), but perhaps most significant is ensuring that the strategy for the south of Buckinghamshire accounts for significant relative deprivation affecting Slough and also Uxbridge.
    - Focusing on Slough – there is a need for a cross-border strategy to deliver on housing needs, and any expansion must also account for town centre regeneration.
    - Focusing on Uxbridge – there is potentially support for the option of high employment growth in the New Denham area. Also, and as discussed above, there is an opportunity for new / improved strategic green and blue infrastructure.
- 7.1.2. In **conclusion**, there is a major opportunity to deliver growth in a way that maximises the net benefits for existing communities, including recognising that the baseline situation is one whereby growth continues to come forward in a sub-optimal piecemeal fashion under the presumption in favour of sustainable development, giving rise to issues and opportunities missed, most notably in terms of infrastructure capacity.
- 7.1.3. However, there is much work to do in order to establish site specific policies and potential concept development frameworks / masterplans for allocations. Whilst it is recognised that there will be good potential to set out detail following the LP4B it is important that the LP4B is adopted with sufficient confidence regarding what will be delivered by allocations (and what will not be delivered), and it can be noted that the Draft NPPF (2025) states: *“Allocations should identify any site-specific expectations and requirements.”*<sup>8</sup> It can also be noted that the emerging Milton Keynes Local Plan (MK2050) includes concept masterplans for all of the proposed strategic allocations, for example Figure 7.1 shows the concept plan for a site adjacent to Buckinghamshire.
- 7.1.4. Finally, as well as a focus on site-specific opportunities there should also be a focus on identifying opportunities at the settlement and sub-area scales and then directing growth so as to deliver on these. One key matter is in respect of strategic green / blue infrastructure, and, in this regard, the Local Nature Recovery Strategy should feed in.

<sup>8</sup> Also, the Draft NPPF states that local plans should: *“Only include policies which extend beyond site or location-specific requirements where these are necessary and where plan makers consider there is a clear and justified reason for inclusion.”*

Figure 7.1: An example concept masterplan for a site allocation (from Reg 19 MK2050, 2025)



## 8. Economy and employment

8.1.1. The Interim SA Report (2025) was supportive of the emerging strategy, concluding:

*“The appraisal... 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.*

*... Whilst there are currently no proposed [employment] allocations, the emerging [strategy] in respect of employment land [is] 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 and 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...”*

8.1.2. At the current time, the first point to note is key context from the recently adopted Buckinghamshire Economic Growth Plan (2025). With regards to the identified potential supply options, overall it is clear that there is ample opportunity to provide for needs and deliver on strategic objectives (see discussion in Section 1). Factors include:

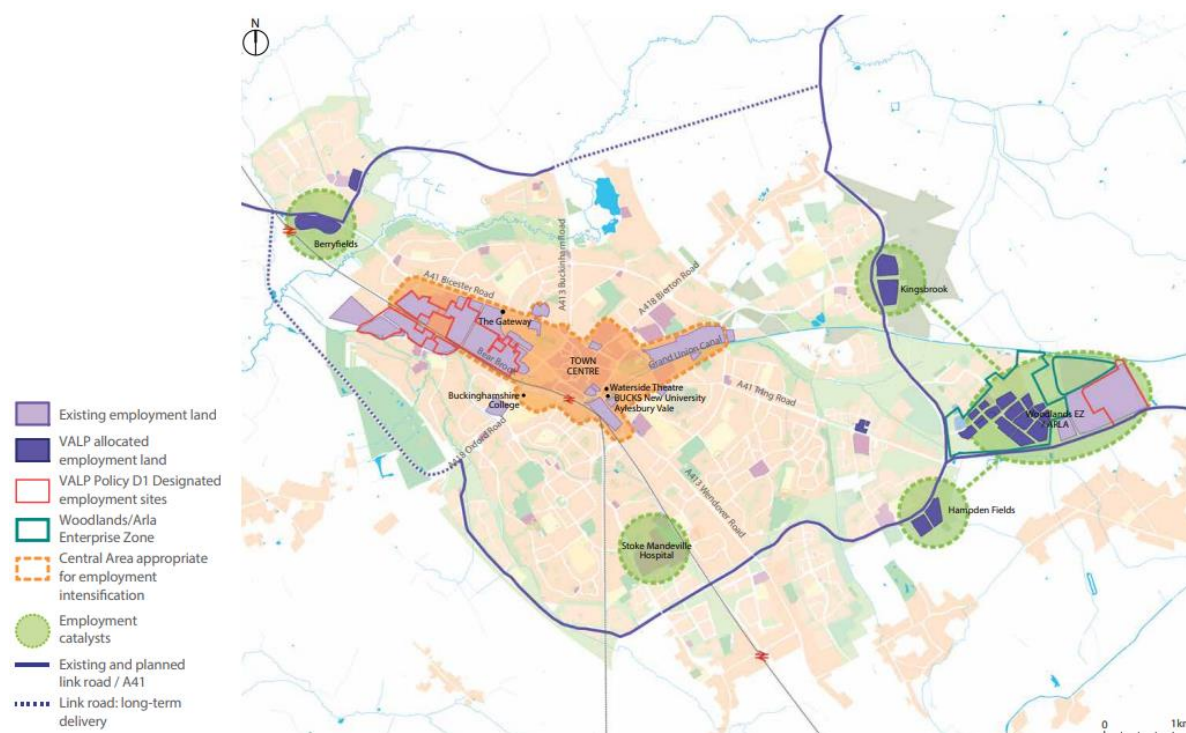


- Brackley and Buckingham – there is support for the Cat1 strategic sites in that both towns have a good existing employment offer and both towns are in proximity to Silverstone / the Silverstone Park Enterprise Zone. However, at Brackley there is a need to carefully consider impacts on the nationally significant A43 corridor.
- East West Rail Corridor – there are few employment land options, but residential-led strategic sites can likely deliver employment land (e.g. 10%), including at Winslow where there is currently limited employment (see Figure 8.3). Also, there is support for providing homes for skilled workers that can support growth in key sectors within Oxford – Milton Keynes – Cambridge growth corridor, which is of national significance.
- Aylesbury – is a key economic hub and so there is support for high potential housing supply, in and around the town, including: A) urban extensions to the north well linked to Westcott; and B) north of Aston Clinton where there is good potential to walk or cycle to strategic employment areas, plus the Cat1 site here is promoted as a mixed use scheme. The option of further strategic growth at Stoke Mandeville (Cat3) warrants ongoing consideration as the site is within walking/cycling distance of the Stoke Mandeville Hospital, which is a significant employer and a growth point linked to MedTech. Finally, completing the strategic road links is a key objective for Aylesbury.
- Westcott – is identified as a key potential location for new strategic employment land in line with its national designation as an Enterprise Zone (along with Silverstone Park, which is partly within Buckinghamshire, and Aylesbury Woodlands). Specifically, Westcott Venture Park is a key cluster for the space and life science sectors. This is a rural location but well-located on the A41, which is a strategic route linking to Bicester.
- Haddenham – has a small industrial/commercial area and is in proximity to Thame, where there is significant existing and committed employment land. Haddenham also links to Bicester and Oxford by train and to Aylesbury via the A418. Westcott is also around 7km to the north but linked only by rural roads. Finally, it is noted that there is a modest sized employment land option located to the west of Haddenham.
- Oakley – is a *discounted* new settlement option but warrants brief mention given proximity to the M40 and Oxford, albeit the site is not well linked to Junction 8a and a new junction is highly unlikely, and there are constraints in this area that likely limit potential for new employment land, including the River Thame and Bernwood Forest.
- Princes Risborough – there is currently limited industrial / commercial land at the town, but there is the potential for modest new employment land to be allocated.
- Stokenchurch – there is an economy/employment case the cluster of three employment site options, given few other options for new employment land adjacent to an M40 junction. The site to the south of the M40 is an existing allocation and would extend an existing industrial/commercial area. It is well contained in the landscape, which is an important consideration as Stokenchurch is within the National Landscape.
- Chesham – the town has a reasonable employment offer, and from the potential strategic growth location to the east of the town there is also good road connectivity to Berkhamsted and Hemel Hempstead, as well as Bovingdon where there is some employment. The Chesham Neighbourhood Plan (2025) seeks to ensure a targeted spatial approach to employment land redevelopment and intensification across the town, including a shift away from historic locations to locations better linked by road.
- Amersham and Little Chalfont – there is significant employment in this area, plus there is good connectivity by road to strategic employment areas via the M25, hence the limited potential supply can be questioned in ‘economy and employment’ terms.
- High Wycombe – there are numerous small employment land or mixed use options, and then there is the option of delivering new strategic employment land at Wycombe Air Park. This area does not link directly to the strategic road network, and so there will be a need to consider the impact of HGV traffic on existing communities.
- Marlow and Bourne End – there is a good local employment offer, plus there is a need to account for recently permitted Marlow Film Studios. There is very low potential supply at Marlow, which suggests support for the Cat1 strategic site at Bourne End.



- Beaconsfield and Chalfont St. Peter / Gerrards Cross – opportunities for very local employment are overall limited (Beaconsfield is home to the National Film and Television School) but the settlements are well linked to key strategic employment areas (including Pinewood), particularly the cluster of Cat 3 sites east of Beaconsfield.
  - South of Buckinghamshire – the potential supply suggests the likelihood of a high employment land growth strategy in this area, which is strongly supported given: excellent train links and links to the strategic road network (M25, M40, M4); proximity to Heathrow, where the Government has backed expansion (and where a new western rail link has been discussed in the past as a possibility); the presence of Pinewood Studios (to the south of which there is a resolution to grant planning permission for a data centre); high demand for data centres; and proximity to London and Slough (a major employment area), including communities experiencing relative deprivation.
- 8.1.3. Finally, there is a need for a good mix of smaller sites that are suited to smaller and medium sized housebuilders. Also, strategic sites can be well suited to delivering an element of self / custom built housing. Overall, the identified potential supply is supported in this regard, but the matter of smaller allocations is a matter for ongoing consideration, including potentially within the National Landscape (where a need for high design standards could suggest opportunities for local builders and trades people).
- 8.1.4. In **conclusion**, moving forward there is a need to ensure a focus on alignment with key national, regional and sub-regional objectives. The emerging LP4B strategy for the Aylesbury area and the for the south of Buckinghamshire appears to perform well in this regard, but there is a need for further work to confirm how growth locations in the north of Buckinghamshire will deliver on an overarching strategy in combination. Ahead of a Spatial Development Strategy (SDS) for a sub-regional Strategic Authority there is a need for a strategic steer through the current engagement from the key stakeholders.
- 8.1.5. Presented below are two figures from existing strategies / plans presented for context, followed by an example of one of the figures presented in the recent Buckinghamshire Economic Growth Plan.

Figure 8.1: Existing and committed strategic employment land at Aylesbury<sup>9</sup>



<sup>9</sup> From the [Aylesbury Garden Town Masterplan](#) (2020). Also note links to sub-regional strategy at Figure 3.1 of the document.

Figure 8.2: “Economic development strategy” from the Wycombe Local Plan (2019)

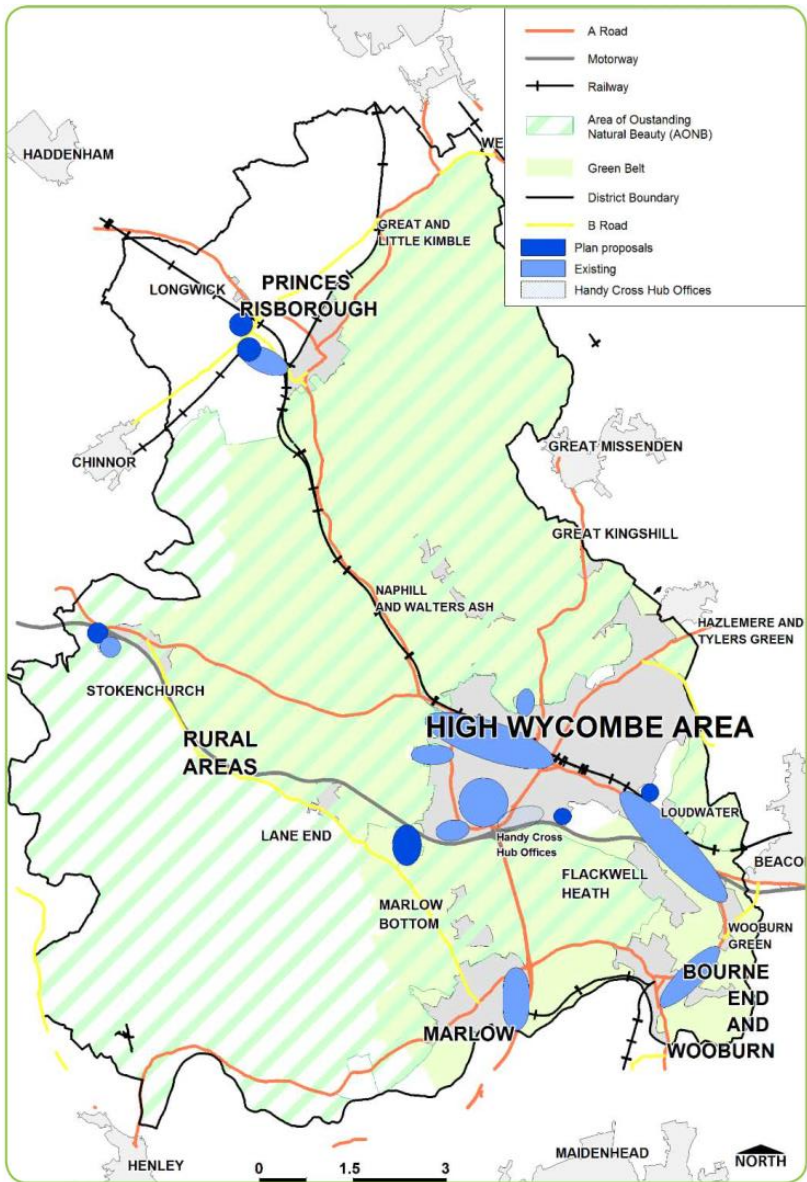
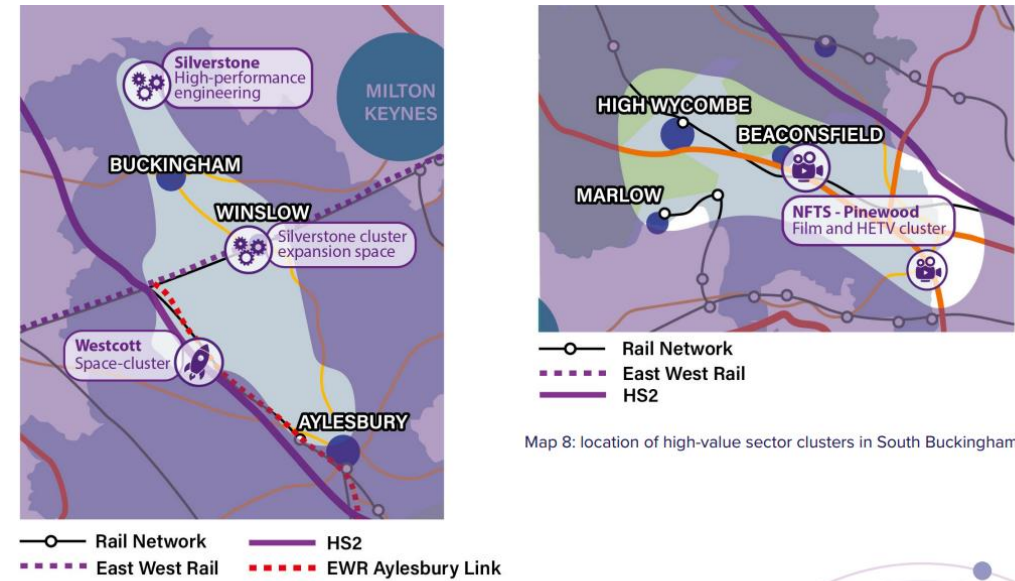


Figure 8.3: High-value sector clusters, from the Buckinghamshire Economic Growth Plan (2025)



Map 7: location of high-value sector clusters in north Buckinghamshire

Map 8: location of high-value sector clusters in South Buckinghamshire

## 9. Historic environment

9.1.1. A high proportion of the potential supply options are associated with a degree of historic environment constraint, such that it is beyond the scope of this report to present a comprehensive discussion. The following bullet points consider key locations in a broad geographic order, beginning in the north of Buckinghamshire:

- Brackley – the Cat1 strategic site is in proximity to the Turweston Conservation Area, which is an important asset close to the edge of Brackley. Masterplanning will need to account for Terweston to the north and the River Great Ouse valley to the south.
- Beachampton – the Cat3 strategic site is located between four village conservation areas and is connected by rural lanes. The site relates most closely to Whaddon, which is a distinct hill top village with a grade 1 listed church, and which gives its name to the Whaddon Chase woodlands (former hunting forest). Also, to the south of Whaddon is a committed strategic urban extension (Shenley Dens) and there is now a Cat1 site that would deliver an extension. Finally, and more broadly, this is the eastern extent of a broad landscape between likely strategic growth areas where there is a significant density of historic villages. In the east is the raised ground of Whaddon Chase and then, to the west, is a network of villages associated with stream corridors.
- Villages in the north of Buckinghamshire – there are numerous Cat1 sites adjacent to a village conservation area, sometimes reflective of villages having expanded very little over the decades. However, it is difficult to pinpoint any where there is a major concern; for example, at Tingewick the sites would expand the village south as far as the bypass, and there are no listed buildings in close proximity. Wingrave is also notable as a village where there are few concerns because the three Cat1 sites are all modest in size and buffered from the conservation area by modern development.
- Buckingham – has a valued historic core, but the proposed strategic growth location to the south is subject to limited constraint. It will be important to maintain a buffer to the Gawcott Conservation Area (also noting that there are three Cat1 sites close to the conservation area, including a small site with a point of access adjacent to the church).
- South of Milton Keynes – the two large Cat1 sites here are subject to limited historic environment constraint, but there is a need to avoid sprawl towards Stoke Hammond, including noting a grade 2\* listed church at the northern edge of the village associated with a slightly raised location above the River Ouzel / Grand Union Canal.
- Calvert – is subject to limited historic environment constraint. Edgcott is a hamlet to the south without a conservation area, but with a grade 2\* listed church on raised land, which could likely be drawn upon to frame growth.
- Steeple Claydon – the NESS site wraps around the southern edge of the village, where there is a grade 2\* listed church (with a steeple / spire) associated with a distinct ridge of raised land, plus there is a need to consider links to Middle Claydon Registered Park and Garden (grade 2), with East Claydon / Botolph Claydon beyond.
- Winslow – the extensive Cat1 supply options give rise to limited concerns in respect of direct impacts to the conservation area given intervening modern and committed development, although there could be a risk of problematic traffic through the conservation area. The other key consideration is containment of growth to the north, given historic villages with conservation areas to the northeast (Great and Little Horwood, associated with raised ground that can be drawn upon to frame/contain growth) and to the west (where Addington Manor is drawn upon for containment).
- Leighton Buzzard – the large Cat3 site to the west is subject to limited constraint.
- Wing – the historic village core – including a prominent scheduled monument (Castle Hill) and a grade 1 listed church – is located on a rising land to the south of a stream corridor, whilst the Cat1 strategic site is associated land to the north. There would be good potential to utilise green/blue infrastructure to buffer the historic core.

- Oakley – is a *discounted* new settlement option that warrants brief mention. The former airfield is not locally listed (but see discussion [here](#)), but to the west is a raised landscape that contributes to the historic setting of Oxford, and a concern is in respect of traffic through Stanton St. John, which is a traditional stone built Oxfordshire village.
- Haddenham – has a highly valued historic core, including with a green associated with a grade 1 listed church and three grade 2\* listed buildings, and from where there are strong links to the river corridor to the south (a tributary of the River Thames that appears mostly not accessible, which could represent a growth opportunity).

However, the conservation area is mostly buffered from potential growth locations, and there are few traffic concerns. Also, there are few concerns regarding sprawl towards the series of historic villages to the north (associated with the River Thames), although containment to the east is more challenging, noting the nearby Dinton Conservation Area. Finally, traffic through the village of Stone is a clear challenge, but this is already a significant road corridor and there are no listed buildings directly alongside the road.

- Aylesbury – potential growth locations to the northwest (extending Berryfields) and southwest / south (much already committed) generate limited concerns, including noting HS2, which serves to reduce concerns regarding impacts to Hartwell House (including noting the possibility of a new strategic western link road). Waddesdon to the north west is sensitive in historic environment terms, given its association with Waddesdon Manor but also because the A41 corridor through the village is associated with significant historic assets / character. Strategic growth to the north of Aston Clinton also generates limited concerns, assuming good potential to buffer the Buckland Conservation Area. However, there is a need to carefully consider further strategic growth to the northeast from a historic environment perspective (Bierton).
- Cheddington – the Cat3 new settlement option is clearly a sensitive given close association with Mentmore Park / Mentmore Towers, including noting a tree lined avenue. Furthermore, a consideration is impacts to the setting of Ivinghoe Beacon, where there is a highly significant hillfort and bowl barrow. Finally, there is a need to consider the landscape to the south associated with the Grand Union Canal and its junction with the Aylesbury Arm, with numerous listed assets including bridges.
- Wendover – the large Cat3 site is associated with limited historic environment sensitivity (noting that RAF Halton is already committed) and there would be good potential to buffer the canal corridor, but traffic through the town centre is a likely issue.
- Princes Risborough – has a valued historic core but key assets are partially bypassed by New Road (shown on [historic maps](#) as Back Lane), and modern built form mostly acts as a buffer to potential strategic growth locations. Expansion to the west (Cat3) could draw upon Bledlow for containment, recognising that this is associated with steeply rising land towards Bledlow Ridge, but expansion to the north (Cat3) gives rise to a concern regarding sprawl towards several small historic villages / hamlets.
- High Wycombe – potential supply options give rise to few concerns. New strategic employment land at Wycombe Air Park would be unlikely to generate significant concerns regarding traffic (potentially including HGVs) through Marlow or Lane End.
- Marlow – has a highly significant historic core where traffic is an issue, such that there is a degree of support for the low identified supply in historic environment terms.
- Bourne End – the Cat1 strategic site is associated with a prominent location along the Wye Valley, which is a broad landscape with distinct historic character including relating to historic industry, notwithstanding extensive modern development. There are two conservation areas along the river in close proximity to the NESS site, namely: Wooburn Town, to the south, which has limited visual connectivity with the Cat1 site, but there is a prominent church adjacent to the A-road; and Wooburn Green to the north, which is sensitive and quite strongly associated with a landscape setting within the Wye Valley, including noting strong visual links with the Cat1 site. However, there would be good potential to mitigate impacts to the Wooburn Green by leaving land in the eastern part of the Cat1 site undeveloped as greenspace.

- Beaconsfield – the highly valued Old Town is in close proximity to Cat3 supply options. There are limited concerns regarding direct impacts to the Old Town, but a degree of increased traffic through the Old Town can be envisaged, notwithstanding good links to the M40. Further considerations are: A) two historic farms that might be drawn upon to contain expansion (but the assets to the north are sensitive given links to the National Landscape); and B) a risk of M25-bound rat-running through Chalfont St. Giles and potentially Jordans (where there is a grade 1 listed Quaker Meeting House).
- Chesham – the option of strategic growth to the east (Cat2 / Cat3) risks encroachment towards the historic hamlets of Lye Green and Ley Hill, but there are no designated conservation areas, and landscape buffers could be maintained. A further consideration is a small number of listed assets that mark the distinction between Chesham to the west and Lye Green / Botley to the east. Finally, it is noted that consideration has been given to intensification of employment land along the Chess Valley, where there is considerable historic character linked to former mills.
- Chalfont St. Giles and Chalfont St. Peter – the supply options mostly give rise to limited concerns, including noting the recent / ongoing development at Newlands Park (a locally listed park/garden). However, the Cat2 strategic site includes a tree lined driveway that links a historic farm to Newlands Park, and along which runs the Chiltern Way. Also, a potential consideration is M40-bound traffic through Chalfont St. Giles.
- Amersham and Little Chalfont – there is low identified potential supply, which might be questioned given overall limited historic environment sensitivity, notwithstanding clear sensitivities associated with Amersham Old Town and also Metroland. However, there are historic environment sensitivities associated with the primary area of land falling outside of the National Landscape, namely the area of land between the two towns.
- Gerrards Cross – the two primary site options (Cat3) are both closely linked to the conservation area. It can also be noted that, whilst there is a low density of listed buildings within the conservation area, there is a high density of locally listed buildings. Also, the site to the west is visible from adjacent grade 2\* listed Bulstrode Park.
- North of Slough – the broad landscape to the north of Slough is sensitive in historic environment terms, notwithstanding urbanising influences affecting land close to the edge of Slough. As such, there is some support for the limited identified potential supply, from a historic environment perspective. A key consideration is the large Cat3 site west of Burnham, noting a cluster of nationally and locally designated assets at Hitcham Park, but early work by the site promoter suggests potential for mitigation. There is also a degree of constraint affecting the two employment site options directly to the north of Slough, but there are detracting features including former landfill.
- The Ivers and Richings Park – there is overall limited historic environment sensitivity, which indicates support for the significant potential supply (Cat2 / Cat3) from a historic environment perspective, however: Iver has an important historic core that links closely to the Colne Valley and West London; Richings Park has a high density of locally listed buildings, and the southern edge of the village is marked by Thorney House. Finally, growth at Shredding Green might feasibly be associated with a degree of historic environment opportunity, noting that Iver Grove is a candidate for local listing.
- Denham / New Denham – Denham is highly sensitive in historic environment terms, including as it is a key asset within the Colne Valley Regional Park, but there would be good potential to avoid impacts. Overall, the potential high growth strategy for this area (primarily employment land) gives rise to limited concerns, but this is on the assumption that growth is contained to low lying land (the Colne Valley) in proximity to the M40 / A413 junction, given that the landscape to the west is associated with some notable assets, including along the Alder Bourne and around Denham Mount.



- Urban sites – there is an ambitious strategy for town centre and wider urban regeneration, and whilst there can be tensions with historic environment / heritage objectives, it is difficult to pinpoint particular concerns at this stage. In High Wycombe there are numerous Cat1 sites within the extensive conservation area, but none immediately stand out as challenging on account of nearby listed buildings. In Aylesbury there are just two adjacent Cat1 sites intersecting the conservation area, and these are notably located adjacent to the grade 2\* listed County Hall. In Chesham the urban supply has been carefully considered through the Chesham Neighbourhood Plan, including with a focus on design coding, whilst in Marlow a Cat1 site notably comprises a town centre car park (with town centre parking an existing issue).

- 9.1.2. Finally, with regards to archaeology outside of scheduled monuments, it is difficult at this stage to identify sites where archaeology may be a constraint with a significant bearing on site suitability, capacity, masterplanning or viability (once the need for detailed excavation and recording work is factored in). It can be noted that the New and Expanded Settlement Study Part 3 includes a strong focus on archaeological constraint; for example, in respect of Beachampton the study explains that the area:

*“... has been subject to archaeological investigation and extensive metal detecting. Numerous multi-period metalwork finds indicate a concentration of Roman activity within the area, and archaeological works undertaken to the east, as part of the Whaddon development, have identified a previously unknown Roman settlement. Any development proposals within this area would be required to be preceded by an appropriate programme of archaeological evaluation, to ensure that any significant remains are preserved in situ or, where necessary, appropriately recorded...”*

- 9.1.3. In **conclusion**, there are a wide range of sensitivities that will require further close consideration ahead of plan finalisation, informed by ongoing engagement with Historic England. An important broad strategic consideration is around impacts to the rural landscape and network of historic villages in the north of Buckinghamshire, but there are also some challenging potential growth locations in the south. It is acknowledged that there will be a need for some targeted Heritage Impact Assessment (HIA) work, including aimed at informing site specific policy / concept masterplanning. For example, it is noted that Dacorum Borough recently completed HIA for five key proposed allocations and Milton Keynes undertook HIA for one proposed allocation.

## 10. Homes

- 10.1.1. Firstly, with regards to growth quantum, it is understood that the potential supply options may be sufficient to enable the housing requirement to be set at Local Housing Need (LHN), i.e. such that the Local Plan (LP4B) does not generate unmet need.
- 10.1.2. However, matters are highly uncertain, in that: A) it may well be that not all of the identified potential supply can be taken forward as allocations in the final plan; B) a number of the strategic site options are associated with uncertainties in respect of capacity and/or the timing of delivery; and C) there is a considerable reliance on urban supply, which is inherently uncertain (i.e. urban sites are often associated with delivery risk including on account of availability and viability challenges).
- 10.1.3. Also, with regards to total growth quantum, there are three further points to make.
- 10.1.4. Firstly, whilst total supply / the housing requirement over the plan period is an important consideration, there is also a need to consider the timing of supply, including with a view to avoiding a stepped housing requirement that would mean that housing needs are not provided for in the early years of the plan period. In this regard there are potentially concerns relating to the high reliance on strategic and urban sites. However, the potential supply also includes numerous small and medium sized greenfield sites, particularly at villages in the north of Buckinghamshire, where there is relative confidence in the ability to deliver early. Specific considerations include:

- Calvert (Cat3) – is perhaps a primary example of a site with significant delivery challenges, including noting landfill and energy from waste operations operational until ~2047. It would require very high investment in new strategic transport infrastructure.
  - Princes Risborough – the committed strategic expansion (a Cat1 site) has faced major delivery challenges, and the further expansion option (Cat3) has many landowners.
  - Steeple Claydon (Cat3) – there is one primary land owner (the Claydon Estate) but development would have to be phased due to construction of HS2 and East West Rail.
  - Strategic site options with simpler land ownership, potentially supportive of earlier delivery / limited delivery risk, include: Stoke Mandeville (3 landowners and part of the site was recently subject to a planning application); Bourne End (but it is not clear that work has been undertaken to date by the promoter); Chalfont St. Peter (there is a pending planning application, and it can also be noted that the Epilepsy Society owns much of land); and Beachampton (but the major costs of required road infrastructure upgrades creates a clear delivery risk; also it can be noted that the site has not been submitted to the Council but was submitted to the Government as a New Town).
- 10.1.5. Secondly, it is arguably in the local interest to identify a supply trajectory that not only meets the identified housing requirement but exceeds it as a contingency for unforeseen delivery issues (i.e. a supply 'buffer' or 'headroom'). This is because failing to deliver on the committed housing requirement leads to punitive measures, namely the local plan being treated as 'out-of-date' such that the presumption in favour of sustainable applies.
- 10.1.6. Thirdly, there may well be arguments made by one or more local authorities that the LP4B should provide for unmet need, with key considerations relating to:
- Slough – where there are few greenfield supply options. However, the Slough Local Plan has made limited progress, with the plan website reporting, by way of a progress update, that a Statement of Community Involvement was adopted in November 2025, an initial timetable will be published in June 2026 and then an updated timetable will be published in October 2026. As such, at this stage it seems unlikely that Slough Borough Council will be able to generate sufficient evidence to demonstrate a need to 'export' unmet need to Buckinghamshire ahead of the LP4B being finalised.
  - London – the possibility of the new London Plan exporting unmet need cannot be discounted, noting that the adopted London Plan generated significant unmet need, and because housing delivery in London has been very low over recent years. However, an early consultation on a new London Plan in 2025 appears to commit to providing for London's housing needs in full *within London*. Also, and as per the situation with respect to Slough, it is difficult to envisage the evidence being generated to justify exporting unmet need to Buckinghamshire ahead of the LP4B being finalised.
- 10.1.7. Having made the above points in respect of overall growth quantum / supply, points to make regarding specific aspects of the identified potential supply are as follows:
- Strategic sites are clearly associated with an opportunity to deliver a good mix of new homes, likely to include the full policy quota of affordable housing and quite possibly to also include specialist housing and/or plots for self-build housing (an important means of allowing households to meet their housing needs).
  - Large scale strategic sites are inherently at risk of unforeseen delays and infrastructure costs that can impact viability and, in this regard, there is a need to note the proximity of a number of the strategic sites, as well as the proximity of strategic growth locations outside of Buckinghamshire. As mentioned under 'climate change mitigation', there is feasibly an opportunity to explore around offsite modern methods of construction.
  - A number of strategic site options / growth locations are associated with delivery uncertainty ahead of further evidence gathering, notably in respect of transport issues and opportunities (including modelling) and a Stage 2 Water Cycle Study.
  - The ability to deliver strategic sites likely varies spatially across Buckinghamshire. For example, Aylesbury and Milton Keynes are likely well placed, but the committed strategic site at Princes Risborough (a much smaller settlement) has not delivered.

- There is broadly a good distribution of housing site options across the County, such that there are few concerns regarding localised housing needs going unmet. However, there is a need to consider the proposed lower growth strategy for Marlow, High Wycombe, Prestwood / Great Missenden, Amersham and Little Chalfont.
- Also, regardless of whether Slough can justifiably 'export' unmet housing need to Buckinghamshire, there is a need for ongoing consideration of growth options in proximity to Slough from a perspective of providing for housing needs.
- Similarly, there is a 'homes' case to be made for growth in the southeast of Buckinghamshire (extending north to Beaconsfield and Chalfont St. Peter) given high house prices in parts of this area and the potential for unmet needs from London.
- Smaller sites at villages can play an important role in terms of meeting very localised housing needs, including by delivering affordable housing and new market homes that allow for downsizing. In this light, it will be important to give ongoing proportionate consideration to supporting modest growth at villages in the National Landscape.
- There is a need to support sites with strong development viability that are able to deliver the full quota of affordable housing (to include a good proportion of social housing) alongside delivering on wider policy asks, e.g. design and space standards.
- The Gypsy and Traveller Accommodation Needs Assessment (GTAA, 2025) identifies a need for 618 new pitches in total, with a need for 500 in the first ten years, and also identifies a need for 38 Travelling Showpeople plots. For context there are currently 423 pitches in Buckinghamshire, which includes 58 pitches at unauthorised sites.

There are a number of identified Gypsies and Traveller site options, plus it may be that several of the strategic sites can deliver pitches (but this can involve a delivery risk), and employment sites can also be appropriate locations for new pitches. Also, there may be the potential to intensify certain existing sites. However, overall there is a risk of significant unmet need, plus it is important to note that needs are often very localised (i.e. there will be specific local needs that risk going unmet).

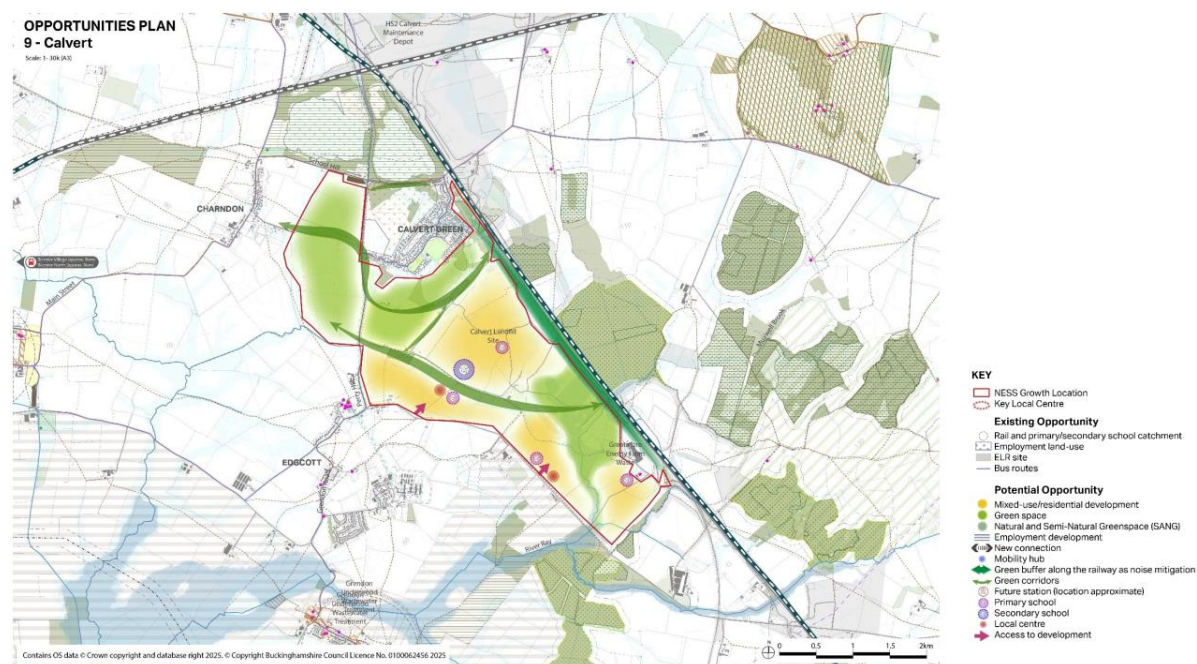
For context, it can be noted that providing for needs is a major issue and nationally. For example, the Royal Borough of Windsor and Maidenhead's Local Plan (2022) was adopted on the assumption that it would be followed by a focused plan to allocate Gypsy and Traveller pitches that has not materialised, and the St. Albans Local Plan is currently the focus of work post submission to boost Gypsy and Traveller pitch supply.

- 10.1.8. In **conclusion**, there is a good mix of identified supply in terms of type of site and geographic location, but it will be important to avoid an over-reliance on strategic sites and urban sites, and there is a case for boosting supply from smaller greenfield sites. There is also a need to identify additional Gypsy and Traveller supply options. Finally, there must be an ongoing focus on maximising supply such that housing needs can be provided for in full and the supply trajectory in the LP4B Buckinghamshire is robust, i.e. there is confidence in being able to deliver on the housing requirement, at least over the early years of the plan period ahead of a local plan review.<sup>10</sup>

<sup>10</sup> The current Welwyn Hatfield Draft Local Plan (see page 15) presents a discussion of a "ten year approach to allocations"



Figure 10.1: Calvert as an example of a site where delivery is challenging (from NESS Stage 3)



## 11. Land, soils and resources

- 11.1.1. Focusing on agricultural land quality, there is very limited grade 2 quality land in the north of Buckinghamshire (where grades 1, 2 and 3a are classified as 'best and most versatile') and there is extensive grade 4 land. However, the nationally available dataset (which is low resolution and does not differentiate between grades 3a and 3b) shows grade 2 land north of Haddenham, as well as a smaller area northeast of Aylesbury.
- 11.1.2. Also, some areas within the north of Buckinghamshire have been surveyed in detail, with the findings sometimes contradicting the national dataset. In particular, surveying to the south of Buckingham and around Winslow shows there to be grade 2 quality land.
- 11.1.3. There is also a significant band of grade 2 quality land along and in proximity to the Chilterns escarpment, such that there is a high likelihood of potential supply options at Princes Risborough comprising grade 2 or grade 3a quality land.
- 11.1.4. Finally, there is a significant belt of high quality agricultural land in the south of Buckinghamshire, including areas of grade 1 quality land. This notably includes land in the vicinity of Shredding Green (between Slough and Iver), where detailed surveying work has been undertaken that shows a mix of grades 1, 2, 3a and 3b quality land.
- 11.1.5. It can also be noted that there are extensive minerals resources in this part of Buckinghamshire, although in many areas this has already been worked out. For context, the latest situation in respect of a review of the Buckinghamshire Minerals and Waste Local Plan is set out [here](#), and overall there is a need to be cognisant of needs.
- 11.1.6. In **conclusion**, there is a high likelihood of the local plan leading to a significant loss of best and most versatile agricultural land, likely to include some grade 2 quality land and potentially also a modest amount of grade 1 quality land. However, it is difficult to know what significance to place on this issue (Natural England may wish to comment) and it is important to note that Buckinghamshire does not stand-out as constrained in the sub-regional context (such that any unmet housing need from Buckinghamshire could lead to pressure on neighbouring areas where agricultural land quality is higher). Moving forward, consideration should be given to directing or weighting growth away from areas with higher quality agricultural land, i.e. this is a criterion that should feed into final work on spatial strategy / site selection, albeit likely as a criterion assigned limited weight. Detailed surveying could also inform site masterplanning (e.g. the location of orchards).

## 12. Landscape

12.1.1. The Interim SA Report (2025) presented a detailed discussion of varying landscape sensitivity across Buckinghamshire, including a discussion for a number of the key settlements. Here the opportunity is taken to firstly discuss each of the strategic site options in turn (whether Cat1, Cat2 or Cat3), informed by the New and Expanded Settlements Study Part 3 (2026). Specifically, account is taken of the score assigned by the study, where a score of 1 indicates low suitability (in landscape terms):

- East of Chesham (1 / 5) – is sensitive on account of the adjacent National Landscape (NL) and noting that the Ashley Green Settled Plateau has “moderate strength of character and intactness” and represents “a relatively rural setting to the settlement of Chesham.” However, it is important to consider this constraint in the context of widespread constraint affecting settlements in the central-southern part of Buckinghamshire (i.e. High Wycombe, Prestwood / Great Missenden, Chesham, Amersham, Chalfont St. Giles and, to a slightly lesser extent, Little Chalfont).
- Haddenham (1 / 5) – is associated with a flat and expansive landscape between the River Thames to the north (beyond which is the rising land of the Mid Vale Ridge) and a stream corridor to the south, such that containment is challenging to the west and to the east. To the west there is a need to consider the gap to Thames, e.g. the extensive flood risk zone might be enhanced as green/blue infrastructure.
- Princes Risborough (1 / 5) – there are broadly three areas for consideration here:
  - Land to the west – is in proximity to the train station but also adjacent to the NL. Land in the NL is low lying / only gradually rising (see [topographic map](#)) but the Chiltern Way and Icknield Way are in proximity, and it is also important to note a series of heritage assets, including three churches.
  - Land to the north – extending Princes Risborough beyond the B4009 potentially gives rise to limited concerns in respect of impacts to the setting of the NL, but this is uncertain given a risk of impacts on [views](#) from Whiteleaf Hill, which is a key viewpoint (with a chalk cutting). Also, this is a flat landscape with few containing features, such that there would be a concern regarding future sprawl.
  - East – expanding eastwards beyond Monks Risborough station towards Great Kimble Station likely does give rise to a concern in respect of impacts on the setting of the NL, recognising that the nearby escarpment is an accessible and popular part of the Chilterns. However, viewpoints are somewhat limited (with key viewpoints to the south at Whiteleaf Cross Hill and to the north at Coombe Hill), and growth in this area would be well contained and viewed in the context of some existing built form. There would be some potential for mitigation (greenspace).
- Chalfont St. Peter (1 / 5) – the issue here is the adjacent NL; however, this is the far extent of the Chilterns dip slope, and the NL is arguably buffered by Newlands Park which, whilst a locally designated park/garden, is the focus of ongoing development. Also, the site includes a tree lined driveway that links a historic farm with Newlands Park, and along which runs the Chiltern Way. Finally, there is a degree of concern regarding containment and, indeed, the risk of coalescence with Chalfont St. Giles and/or Chalfont St. Peter extending beyond the confines of the Misbourne Valley. It is important to note that this is the far extent of the Colne Valley Regional Park.
- Wing (1 / 5) – this is a transitional area between the Mid Vale Ridge and the Vale of Aylesbury (specifically the eastern sector of the vale, where land drains north to the River Great Ouse via the River Ouzel; see [topographic map](#)). The historic core of the village – including Wing Castle Scheduled Monument, where the Castle Hill motte survives well as an earthwork – is on distinctly raised land above a valley to the west, which is associated with the potential NESS option. In turn there is landscape sensitivity, but the valley could also be drawn upon to frame and contain growth.
- Northeast Aylesbury (2 / 5) – this is a distinctly rural landscape, with no roads / lanes and only one public footpath. There is potential for containment by the River Thames, beyond which is valued rising land of the Mid Vale Ridge.

- Cheddington (2 / 5) – a key issue is potentially the setting of the NL including given views from the Ridgeway National Trail. However, there is containment by Mentmore Park / Towers to the north, the Grand Union Canal to the east, a distinct hill at Cheddington to the south (with a hill fort) and flood risk zones and scheduled monuments to the west. Containment is weaker to the northwest.
- Steeple Claydon (2 / 5) – growth to the south could be well contained by the railway line, and there is little reason to suggest that a new station is a viable option hence there is no clear concern around growth then extending beyond the railway line. Growth could also be somewhat contained to the west and east by flood zones, but the flood zones are modest in extent. A key feature is a raised ridge south of the village, where there is a prominent church with a steeple. To the east of the ridge is the Bernwood Jubilee Way, which links to Claydon Park and of East Claydon (on raised ground). From a landscape perspective there might be a case for focusing growth to the west only, including potentially aiming for a scheme that links with growth at Calvert, which could then boost the potential for a new station on East West Rail.
- Bourne End (3 / 5) – much of the AA is associated with the steeply sloping side of the Wye Valley, which is an important landscape linking the Chilterns to the Thames, and which is easily appreciated from road and public rights of way. However, the western part of the NESS site relates reasonably well to the edge of Bourne End, and this part of the site is also contained by an industrial area to the south.
- Calvert (3 out of 5) – this is a transitional landscape between the Mid Vale Ridge to the east and the vale landscape of the Upper River Ray to the west (see [topographic map](#)). There is a distinct series of local hills, and it should be possible to draw upon a range of topographical features to frame and contain growth. However, this could lead to a settlement with an irregular shape, which then suggests challenging containment.
- Winslow (3 / 5) – the existing village is associated with slightly raised land, with the NESS site to the north associated with lower land at the eastern edge of the Claydon Brook vale landscape. This landscape is understood to be in relatively poor condition; however, containment is challenging, in that: A) there could be a risk of sprawl towards Great and Little Horwood to the east, which are associated with a distinct ridge of raised land; and B) to the west containment is provided by a locally designated park/garden, which is linked to Winslow by the Cross Bucks Way.
- Beachampton (3 / 5) – the edge of Milton Keynes is associated with a distinct ridge of raised land ('the Shenley Ridge') and then land to the southwest edge of Milton Keynes is very strongly marked by the raised landscape of Whaddon Chase, including the villages of Nash, Whaddon, Great Horwood and Little Horwood. As such, it could be suggested that there is scope for a new settlement in the Beachampton area (see [topographic map](#)), perhaps with the Calverton Brook utilised and enhanced as a feature that maintains separation to Milton Keynes. It is noted that two long distance footpaths converge in this area, but that there is limited accessibility to the River Great Ouse corridor to the north, which could also represent an enhancement opportunity.
- Stoke Mandeville (4 / 5) – the NESS site is located between HS2 to the west and the Chiltern Line to the east. However, there is a degree of constraint on account of proximity to the Chilterns escarpment, including two key viewpoints.
- South of Buckingham (5 / 5) – there is limited landscape sensitivity, particularly in proximity to the A421 and the A413. However, containment is challenging and there is a particular risk of eastwards sprawl. The eastern part of the site falls away from the settlement edge, and the effect of growth would be that Buckingham extends beyond the confines of the River Great Ouse Valley into the Padbury Brook Valley.
- East of Brackley (5 / 5) – the site is scored poorly as it is primarily associated with a Landscape Character Area (LCA) assessed as being in poor condition. However, there is a need to consider a distinct edge to Brackley provided by the River Great Ouse, the A43 and the village of Turweston. Also, it is noted that a named bridleway passes through this area. Containment is provided by HS2, but there is a need to carefully consider the relationship between the site and the river valley. A wastewater treatment works along the river would assist with securing a buffer.

12.1.2. Having discussed the NESS sites, the following bullet points consider non-strategic sites (Cat1, Cat2 and Cat3):

- Southwest Milton Keynes – the large Cat1 site would extend a recently permitted scheme and would be very well contained by ancient woodlands, but a bridleway passes through this area that forms part of a circular route linking to Milton Keynes.
- South of Milton Keynes – the two large adjacent Cat 1 sites have limited sensitivity but avoiding sprawl towards Stoke Hammond is an important consideration.
- Winslow – there is a need to carefully consider expansion to the west and east (Cat 1) noting that the land falls away from the settlement edge towards the Claydon Brook.
- Villages in the north of Buckinghamshire – Cat1 sites are mostly well related to the settlement edge and well contained by strong features. At Padbury one of the site options would use only part of a field, i.e. would not draw upon a field boundary for containment such that there could be a risk of sub-optimal creep over time.
- Leighton Buzzard – the large Cat3 site falls away from the settlement edge towards a distinct valley, but the valley is associated with the A4146. The site is located at the northern edge of the Green Belt, and there is overall quite strong containment.
- Waddesdon – there is a collection of Cat1 sites to the north of the village, which generate limited concerns given containment by HS2 and the new A41 route, plus modern built form buffers the village historic core and Waddesdon Manor. However, the possibility of comprehensive growth to deliver a bypass might be considered, including noting a pending appeal for 535 homes to the northwest of the village.
- Northwest Aylesbury – there is a need to carefully consider expansion of the recently delivered Berryfields development, with the Cat1 site involving expansion to the east in the context of requests for EIA screening opinions recently having been submitted for schemes that would see expansion to the west and to the north. This is a vale landscape where containment is challenging, but a scheme to the east would relate well to the new link road and could draw upon slightly rising land for containment.
- Cheddington, Ivinghoe, Pitstone and Marsworth – the in-combination effect of Cat1 sites across these villages is a consideration, given the nearby Chilterns escarpment. A site at Marsworth is not contained by a field boundary but is enclosed on two sides.
- Smokey Row / Little Kimble – whilst there is an opportunity for growth in proximity to a railway station, this Cat1 site is likely sensitive in terms of impacts to the setting of the NL, given views from Beacon Hill and also noting the long distance footpath that passes through the site. However, the site is well screened from the surrounding roads by development. Finally, it is also noted that part of the site is under construction for 45 homes, which highlights the importance of a strategic approach.
- Wendover – the large Cat3 site to the north is clearly sensitive given the close association of Wendover with Coombe Hill, Bacombe Hill and Wendover Woods. However, the site relates well to the settlement and is well-contained.
- The National Landscape (NL) – the proposal to support low growth in the NL is supported in landscape terms.<sup>11</sup> Considerations include:
  - Stokenchurch – the option of significant new employment land adjacent to the M40 junction potentially generates limited concerns, also noting the influence of the A40. It is noted that this is the route to nearby Aston Rowant National Nature Reserve, which is associated with iconic views, and the BT Tower is a landmark.
  - High Wycombe – the key consideration here is likely the option of new strategic employment land at Wycombe Air Park, which falls outside the NL but is surrounded by the NL on three sides. This is a raised plateau with views across valleys to the west and south, which can be appreciated from footpaths linking High Wycombe to the Hambleden Valley, but the site is well screened from surrounding roads.

<sup>11</sup> N.B. the Draft Green Belt Assessment (2026) presents a high level review of numerous small parcels of land adjacent to settlements in the NL and concludes that it is very difficult to identify parcels that clearly contribute little to the NL's significance.

- Chesham – an employment site option has been considered within the Chess Valley adjacent to the NL. It comprises a listed mill and the Chess Valley Way is adjacent (a key asset as it is a popular walk between Metropolitan Line stations).
  - Beaconsfield – there is a significant density of Cat3 site options around the southern and eastern edges of the town, where land falls outside of the NL. Most of these site options give rise to limited landscape concern, but part of the site to the north east is adjacent to the NL and is potentially sensitive in that it faces away from Beaconsfield / towards the NL and is visible from Long Bottom Lane, plus two listed buildings are of note. Overall, the possibility of growth in this area gives rise to relatively limited landscape concerns, and a comprehensive approach to growth could secure mitigation and targeted green / blue infrastructure benefits and serve to minimise the risk of sub-optimal piecemeal growth over time. A potential concern is eastwards sprawl south of the A40, but land to the east of the HELAA site here is former landfill, and it is also noted that – whilst not identified as a potential supply option – there was recently a pre-application consultation on a proposal for a data centre and extensive greenspace.
  - Chalfont St. Giles and Chalfont St. Peter – the site options here (Cat2 and Cat3) mostly give rise to limited concerns from a landscape perspective, but there is a need to guard against piecemeal growth impacting separation between the two settlements.
  - Gerrards Cross – there are two significant Cat3 sites to the west and to the east, but landscape constraint is overall limited. The site to the west is the more sensitive, including noting views towards (from a footbridge over the railway) and from Bulstrode Park. The site to the east is adjacent to a locally listed pub at the edge of the conservation area, but the land is not accessible and is well screened and contained.
  - Burnham – the Cat3 sites relate reasonably well to the settlement edge, but there is a need to guard against sub-optimal piecemeal expansion in this area, including with opportunities missed to secure infrastructure benefits and strategic greenspace. A recent site promoter consultation for a 1,000 home scheme is noted.
  - Farnham Royal / Common – supply options here are very limited on account of constraints, and the two identified Cat 3 site options would risk further eroding what is already a very small Green Belt gap between the settlements. Both sites also include significant priority habitat woodland, although this might serve to restrict capacity.
  - Stoke Poges – the identified Cat3 option would involve mixed use redevelopment within Sefton Park, which is a former parkland and an existing hub for offices uses and also an SEN school. The site relates well to the settlement edge and TPOs could be drawn upon for containment, as well as surface water flood zones. However, this is something of a green buffer to Slough, likely appreciated from public rights of way.
  - Slough – the two large employment sites to the northeast have been discussed above as having limited sensitivity on a number of grounds, including noting degraded land. However, there is a need to consider the canal corridor and the heritage value of Middle Green, which are both assets marking and accessible from the edge of Slough.
  - Denham / New Denham – as discussed, there is a need to carefully consider the importance of Denham in the context of the Colne Valley Regional Park and avoid sprawl to the west onto raised land or along either of the river corridors. The sites at Denham (Cat3) appear to be subject to limited constraint but are located very close to the Colne Valley Regional Park visitor centre, which is an important destination.
  - The Ivers and Richings Park – there is limited constraint, but it is noted that a Cat2 site north of Iver is closely associated with the Colne Valley Trail, and across this area there is a need to consider settlement separation with a strategic perspective.
- 12.1.3. In conclusion, a number of the NESS sites are associated with limited landscape sensitivity, but there are a range of important considerations, including relating to National Landscape setting and valued landscapes associated with the Mid Vale Ridge in the north of Buckinghamshire. Within the Green Belt there are a number of areas with sensitive settlement gaps, and at all locations there is a need to consider containment and the importance of comprehensive growth that maximises benefits and minimises risk of sub-optimal development creep / sprawl over time.



*Figure 12.1: A recent speculative application near to Waddesdon (22/03384/AOP)*

## 13. Transport

13.1.1. Building upon the discussion above under ‘accessibility’ and ‘air quality’, this section begins by presenting a brief review of each of the strategic site options. Specifically, Table 13.1 draws upon the NESS Study Part 3 (2026) to report the DfT connectivity score for each of the sites and present a brief commentary on issues/opportunities.

*Table 13.1: Consideration of the NESS sites in order of DfT connectivity score*

NESS site	Score	Commentary
Wooburn and Bourne End	58	This is an accessible and well-connected location, but the nearby railway station is a branch line and there are some strategic road constraints, including as M40 journeys will be via the A4094 and the A404, or via Flackwell Heath. Links to Beaconsfield station are a key consideration. Finally, there is continuing ambition to enhance the former railway line to High Wycombe as an active travel route.
Haddenham	51	Firstly, it should be noted that parts of the two site areas which lie north of Haddenham achieve a lower connectivity score. Haddenham has a well-connected train station (as per draft NPPF definition) and also benefits from strong bus links to Aylesbury, Thame and Oxford. There may be potential to boost the local service offer (feasibly a secondary school), enhance links to Thame and also address congestion in the vicinity of the station. The LCWIP (see below) proposes an inter-settlement cycle route linking Aylesbury to Thame via Haddenham, but delivery is uncertain.
Stoke Mandeville	51	This is a strongly performing location in transport terms, given proximity of the railway station and good links into Aylesbury, with the A413 a well-served bus corridor and given an off-road cycle path. The planned and newly opened link roads around Aylesbury, including the Stoke Mandeville Relief Road should provide better connectivity around the town and to the wider network towards Leighton Buzzard, Milton Keynes and Bicester. Finally, there is the possibility of replacing a footpath level crossing with a footbridge.

NESS site	Score	Commentary
Chalfont St Peter	46	Bus routes along the A413 are reached via a steep hill, and the potential to effectively route services through the site is unclear. There is a need to consider the suitability of Chesham Lane, Gorelands Lane and Chalfont Lane to accept traffic, and some traffic may pass through Chalfont St. Giles on route to the M40. The centre of Chalfont St. Peter is not easily accessed, nor the existing secondary school and, whilst the LCWIP identifies a possible inter-settlement cycle route linking to Little Chalfont, this could prove challenging to deliver and distance would be ~5 km.
Aylesbury	45	Firstly, it should be noted that the part of the site adjacent to Aylesbury achieves a higher connectivity score of up to 75. Overall, this is a strongly performing site in transport terms, including as there would be good potential to deliver the 'missing link' in the new link roads to the north of Aylesbury, which would enhance the attractiveness of the link roads and could remove traffic from the centre of Aylesbury, reducing congestion and potentially allowing for other improvements. Under the Aylesbury Garden Town programme there would be good potential to deliver sustainable transport links that in support of strong connectivity.
Buckingham	42	There is accessibility to services and facilities in Buckingham, and the potential to deliver both additional community infrastructure and a new strategic road link. The A421 is a challenging road corridor, linking Milton Keynes and the M40, and growth could assist with delivering enhancements, but there is already a good bus service (limited stopping) linking Milton Keynes to Oxford. Buckingham does not have railway station but there is a bus link and recently delivered new strategic cycle link to Winslow (East West Rail). Finally, it is important to consider the in-combination effect of growth at Buckingham, Brackley and Milton Keynes.
Princes Risborough	40	Firstly, it should be noted that the part of the site adjacent to Princes Risborough achieves a higher connectivity score of up to 75. The main station is defined as "well-connected" and growth in proximity any of the stations is a key opportunity to explore, but there are constraints to growth notably relating to the setting of the NL. Additional growth could help to deliver the new relief road that is a commitment within the Wycombe Local Plan (2019) and it is understood that growth could help to fund station improvements.
Chesham	40	The town benefits from a well-connected train station (as per draft NPPF definition) but an issue is linking to the strategic road network, including noting that the A416 passes through the centre of Chesham and also through Ashley Green, plus rat-running through Bovingdon and potentially the National Landscape to the south is a consideration. Also, links into Chesham are challenging, including on account a steep hill (also noting a secondary school).
Wing	39	There is an existing cycle route into Leighton Buzzard, and it seems likely that there would be good potential for enhancement (this is one of the key corridors identified in the LCWIP). It is not clear that there are any relief road options, but growth to the northeast of Aylesbury might assist with an enhanced bus service, including to aimed at better linking Aylesbury with Luton / Dunstable.
Turweston	38	There is no railway connectivity in this area, connectivity into Brackley is potentially challenging and the A43 is a key link between the M40 corridor and Northampton, including for HGVs linking to nationally significant distribution hubs. Traffic through Buckingham is another potential factor, but again a potential LCWIP cycle route is noted.

NESS site	Score	Commentary
Cheddington	34	The village benefits from a well-connected train station (as per draft NPPF definition), and HS2 is expected to release some capacity on the West Coast Main Line. This is a rural area between Aylesbury to the west (flood zones are a constraint to connectivity), Leighton Buzzard to the north, Dunstable to the east and the Chilterns / Grand Union Canal corridor to the south, and there would be a need for major road upgrades.
Beachampton	29	This is a rural area connected by lanes, but in proximity to Milton Keynes. The recently published Milton Keynes Local Plan (MK2050) proposes a series of Mass Rapid Transit (MRT) routes (which may ultimately develop as a 'metro' system), but none are proposed to link to this area. The strategic road network is not easily accessed, including noting the river corridor and the heritage sensitivity of Stoney Stratford to the north, plus there is a need to consider the challenging A421 to the south.
Steeple Claydon	26	There are no B-roads in this area, let alone an A-road. Re-opening the station is unlikely to be a viable option, but there could potentially be strategic transport solutions to explore in combination with growth at Bicester, Calvert and Winslow. The existing bus service links to Bicester and Buckingham but not Winslow.
Calvert	23	The situation is similar to Steeple Claydon, but Bicester is within easier cycle distance (the route is flat given the Upper River Ray landscape). Also, the A41 is nearby, with an existing good bus service that could be enhanced. If longer term aspirations for linking Aylesbury and Milton Keynes as part of an expanded EWR came to fruition, this could create opportunity for a station at Calvert, should a rail alignment be secured along the HS2 route (an alternative former railway route between Quainton and Verney Junction may be considered instead). A new road link towards Westcott and the A41 would also help considerably.
Winslow	21	Firstly, it is important to note that the connectivity score does not account for East West Rail, with the station soon to open. East-west road connectivity is challenging, and there are also challenges in respect of north-south connectivity via the A413, given that the road passes through Winslow and Whitchurch and noting that there is congestion at the junction with the A421. As discussed, there is a new high quality cycle link to Buckingham, but it is unclear whether this would be a safe and attractive route to access secondary schools. The centre of Winslow would not be easily accessed from parts of the site.

13.1.2. With regards to HELAA sites the key issues have already been discussed above; for example: there is a case for growth at Beaconsfield and Gerrards Cross from a transport and accessibility perspective (both have well-connected stations); the Cat3 site at Leighton Buzzard also performs well; there is tentative support for the concentration of sites in the far southeast of Buckinghamshire; and modest growth at villages must be carefully considered in transport terms (given high car dependency but also potentially some transport / accessibility opportunities).

13.1.3. To end, it is appropriate to focus the matter of directing growth in order to align with strategy in respect of bus and cycle connectivity:

- Bus connectivity – the recently adopted Local Transport Plan 5 (LTP5) explains the need to align with the Bus Improvement Plan, which was most recently updated in 2024. This includes a figure showing the “core interurban services” and there might be a focus on supporting / enhancing these. However, alternatively new such services could be secured, plus supporting / enhancing wider services can also be a priority.



- Cycle connectivity – the Local Cycling and Walking Infrastructure Plan (LCWIP) serves to highlight many areas where growth might be targeted with a view to funding priority new and upgraded routes. There is a high density of proposed routes, and so it will be important to target efforts and ensure coordination with the spatial strategy for growth. As part of this, there should be a focus on delivering the Buckinghamshire Greenway.

13.1.4. In **conclusion**, it will be crucially important that key stakeholder organisations comment in detail through the current consultation in order to inform plan finalisation and ensure that growth in Buckinghamshire aligns with vision-led transport principles.

Figure 13.1: Existing cycle infrastructure (from the LCWIP)

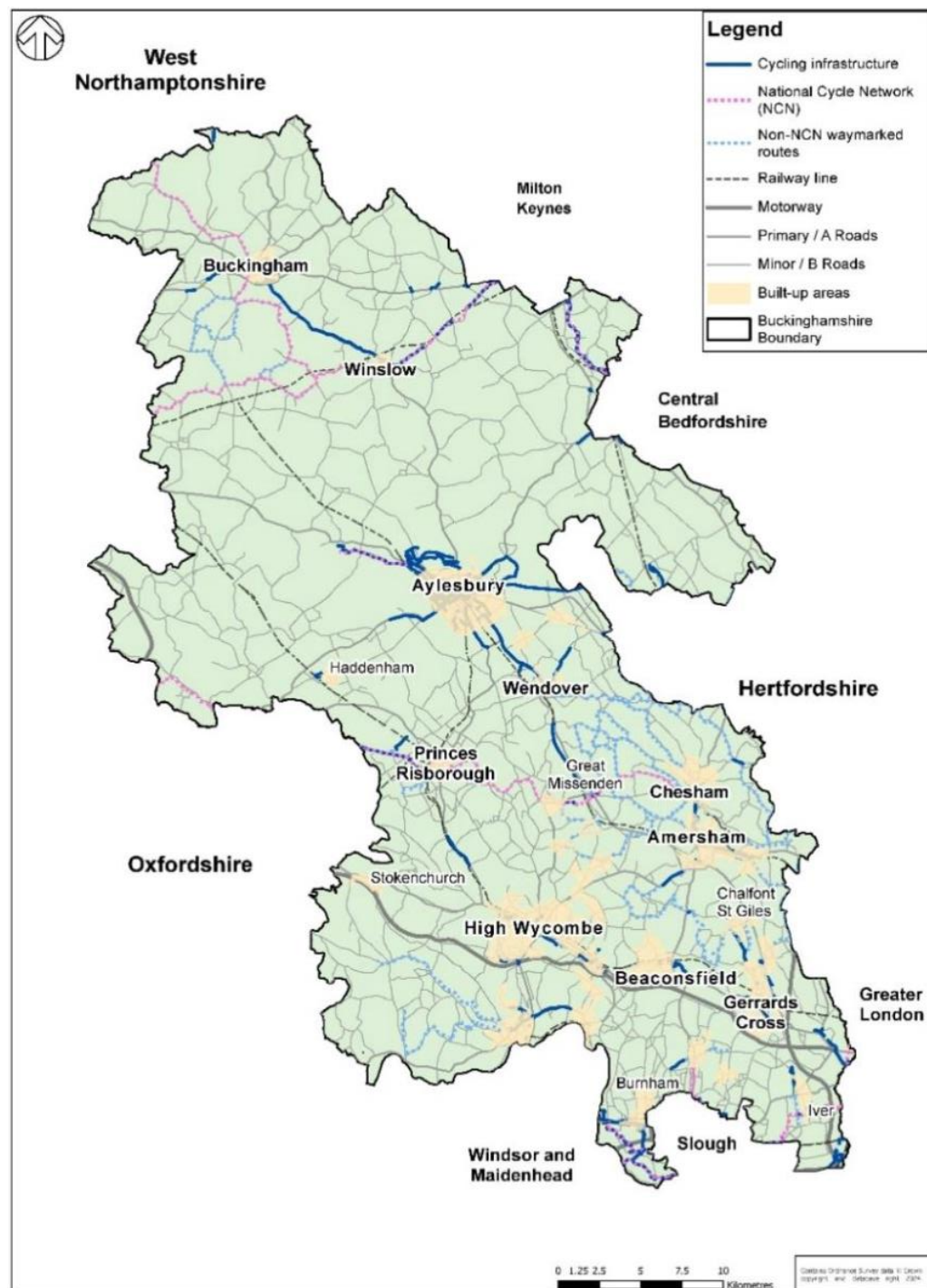


Figure 13.2: The proposed LCWIP network (from the LCWIP)



Figure 13.3: Core interurban bus services (from the *Bus Improvement Plan, 2024*)

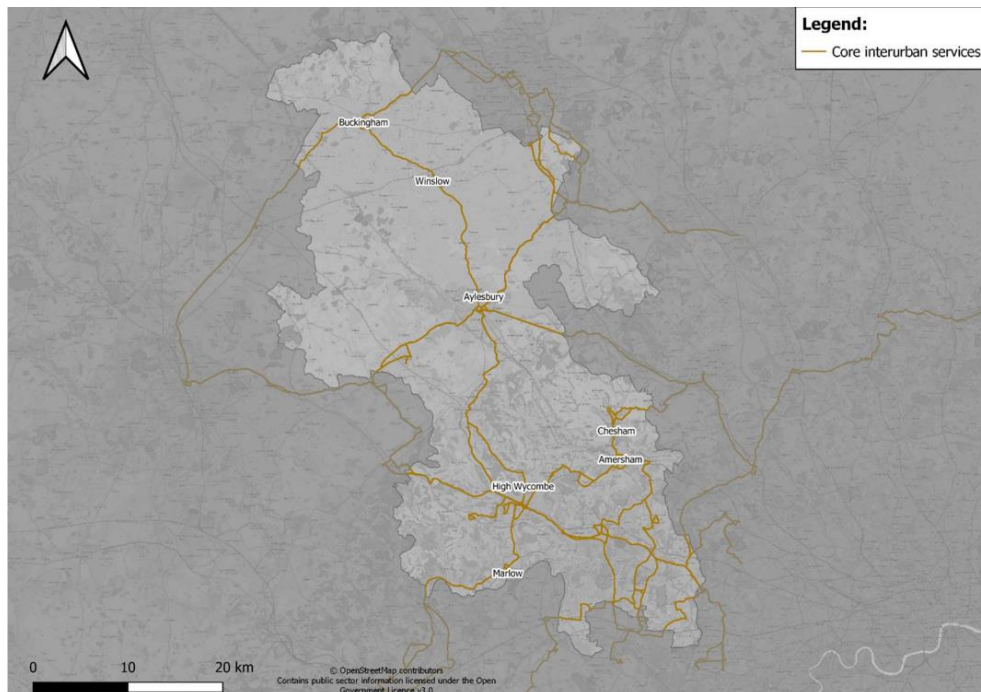
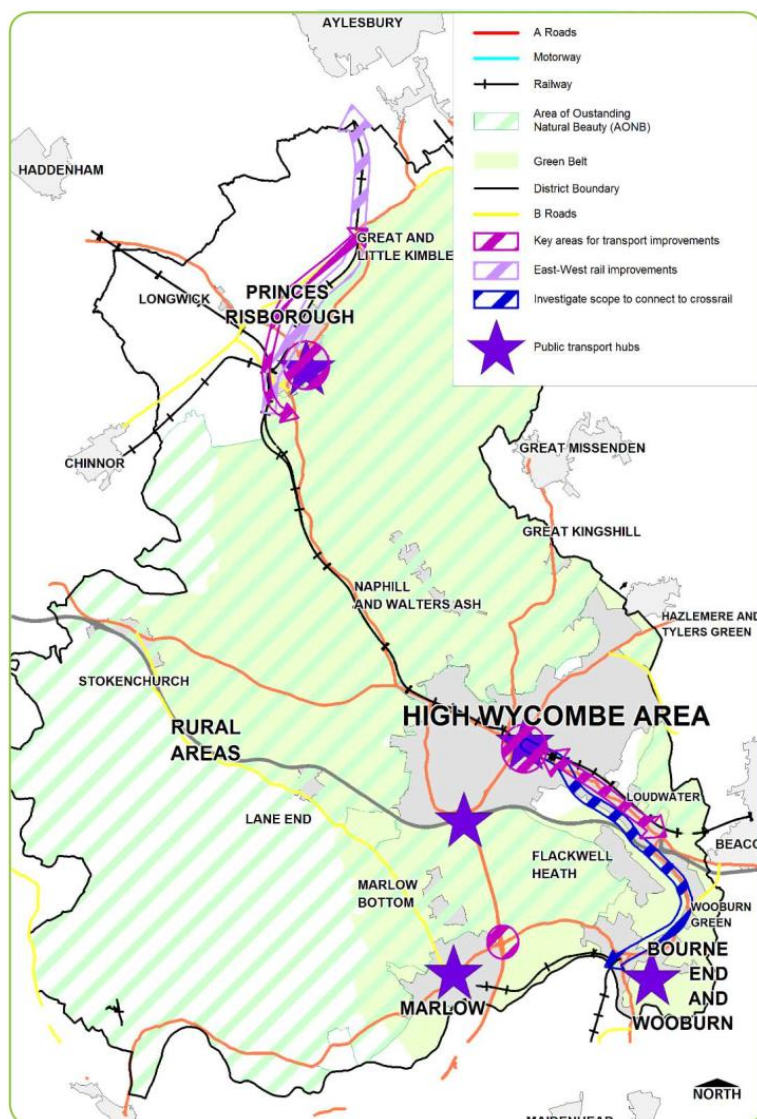


Figure 13.4: The adopted Wycombe Local Plan transport strategy (2019)



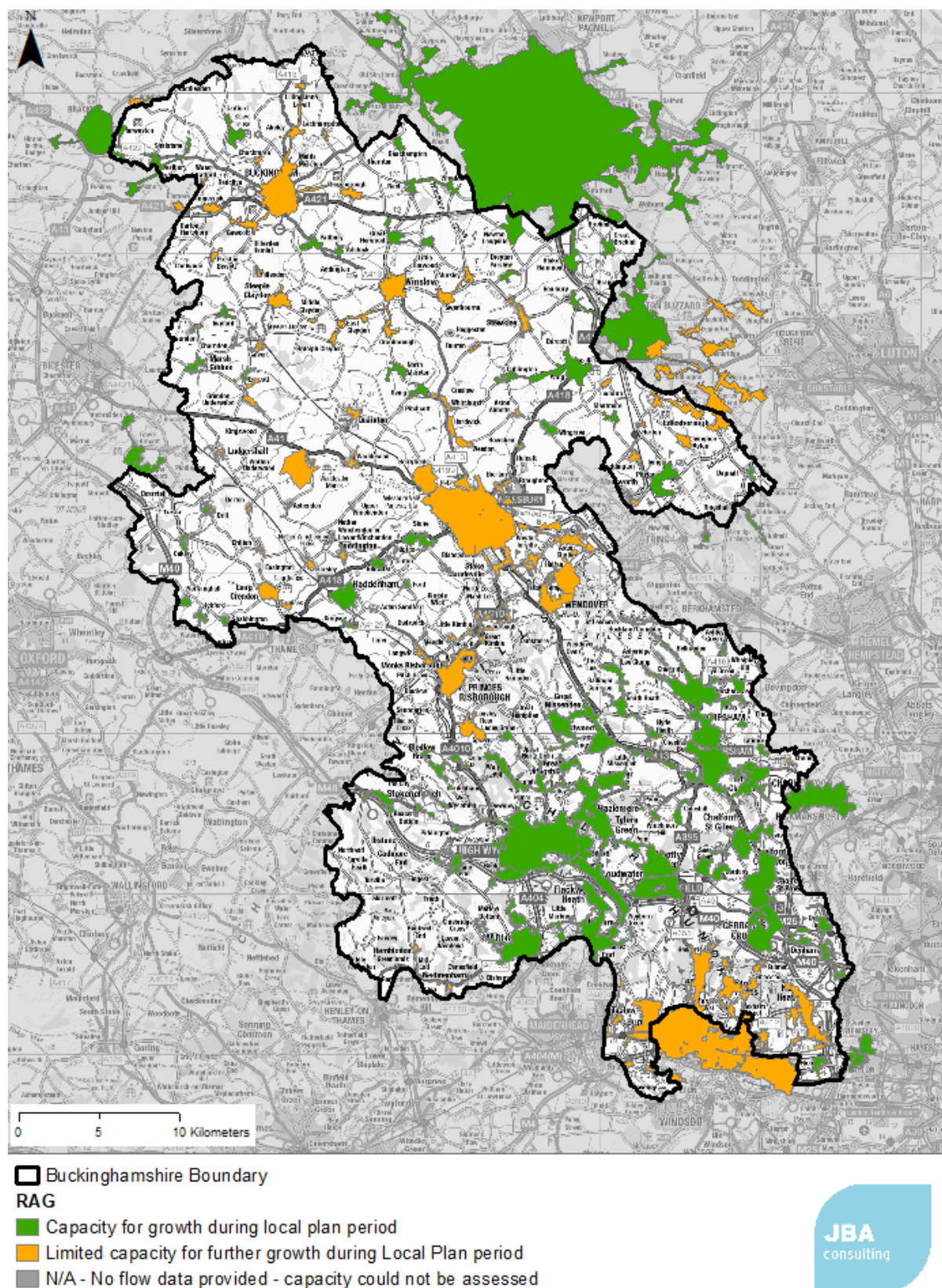
## 14. Water

- 14.1.1. A Stage 1 Water Cycle Study (WCS) has been prepared that explores six topics. This is currently being reviewed and updated for site options as a Stage 2 study.
- 14.1.2. 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, and this recommendation fed into the Draft Buckinghamshire Local Plan published for consultation in 2025. 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.”*
- 14.1.3. 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 are a major factor with a bearing on spatial strategy / site selection, and it can be noted that Buckinghamshire does not stand-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).
- 14.1.4. 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.”* Also, it goes on to suggest:
- *“Larger residential developments... 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.
- 14.1.5. As discussed, it is evidently the case that there is good potential to direct a high proportion of growth to strategic sites.
- 14.1.6. 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. It can also be noted that the water sector is likely entering into a period of reform (see the Water White Paper, 2026). 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.
- 14.1.7. 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.
- 14.1.8. 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.”*

- 14.1.9. However, it is important to be clear that the assessment accounts only for ‘baseline’ growth from existing committed sites (i.e. sites with planning permission, as opposed to a baseline scenario that assumes growth under the presumption in favour of sustainable development in the absence of a plan, which cannot be predicted). Also, some WwTW catchments cross significantly into neighbouring local authority areas, most notably Maple Lodge WwTW, which also serves a large part of southwest Hertfordshire.
- 14.1.10. Figure 14.1 shows 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 recalling that it assumes a baseline level of growth and because capacity is a matter for detailed ongoing investigation; for example, it is noted that Gerrards Cross WwTW was associated with a high frequency of storm overflows in 2022, specifically discharging into the River Misbourne (a chalk stream) 66 times for a total of 1206 hours.
- 14.1.11. 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.
- 14.1.12. 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 (treated and untreated), agricultural is also a key factor. The following 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].”*
  - Sustainable Drainage Systems (SuDS) – are a key means of avoiding both flood risk and water quality concerns. Most sites can be expected to deliver high quality SuDS, but geology can be a constraint in some areas.
  - 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 constrained on account of water quality (nitrates and/or phosphates) or water resources (i.e. groundwater levels) affecting internationally designated sites this is not currently 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 natural flood risk management.
- 14.1.13. In **conclusion**, this section has presented a high level discussion, in the knowledge that the Stage 2 WCS will inform work to consider site options at the next stage. Overall, it appears that water resource and water quality issues are unlikely to serve as a significant factor with a bearing on spatial strategy / site selection, but there is a need for ongoing work in collaboration with partner organisations. A key issue is strategic targeting of growth with a long term perspective, as opposed to piecemeal and unpredictable growth. It is noted that water companies often favour strategic sites, which can be planned with a long time horizon and can deliver innovative solutions.



Figure 14.1: Headroom capacity at wastewater treatment works



Source: JRM-JBAU-XX-XX-MX-EN-0007-S1-P01-WwTW\_RAG\_Buckinghamshire.mxd  
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## 15. Conclusions and next steps

- 15.1.1. Having considered the potential supply options (Cat 1, Cat2 and Cat3 sites) it is clear that finalising a plan in 2026 that allocates sites such that total supply meets and exceeds Local Housing Need (i.e. such that the housing requirement can be set at LHN, including from the outset the plan period) will be highly challenging.
- 15.1.2. The risk is that issues / impacts arise and opportunities are missed, ultimately leading to conflicts with plan and wider sustainability objectives. However, it is equally the case that adopting the LP4B is an urgent priority because the alternative is piecemeal and sub-optimal growth under the presumption in favour of sustainable development.
- 15.1.3. As such, the current engagement exercise is of great importance.
- 15.1.4. With regards to next steps:
- Subsequent to the current engagement exercise there will be further evidence-gathering / analysis before work is undertaken to define and appraise reasonable alternatives in the form of growth scenarios.
  - 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 centrally important 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 alongside a summary of the main issues raised through the Regulation 19 publication period.
  - 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.
  - 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".



