

Strategic Environmental Assessment (SEA) for the Shenley Park Supplementary Planning Document (SPD)

Scoping Report (updated post consultation)

March 2023

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1. Introduction

1.1 AECOM has been commissioned by Buckinghamshire Council to undertake an independent Strategic Environmental Assessment (SEA) in support of the emerging Shenley Park Supplementary Planning Document (SPD).

- 1.2 The intention is for the SPD, once adopted, to build upon and provide more detailed advice or guidance on site allocation D-WHA001 (Shenley Park), which forms part of Policy D2 (Delivering site allocations in the rest of Aylesbury Vale) of the adopted Vale of Aylesbury Local Plan (VALP).
- 1.3 This report is the SEA Scoping Report. It presents the scope of the SEA and, in turn, aims to inform preparation of the Environmental Report, which is the primary output of the required SEA process.
- 1.4 A draft version of this report was published for consultation in March 2023, and consultation responses were received from the Historic England and Natural England. This current version of the report has been updated to reflect consultation responses received. However, it should be noted that limited further updates have been made to the report to reflect the latest available evidence. Please see the Environmental Report for up-to-date analysis.

The SPD explained

1.5 The National Planning Policy Framework (NPPF)¹ states that SPDs are:

"Documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. SPDs are capable of being a material consideration in planning decisions but are not part of the development plan."

1.6 The government's online guidance on plan-making² adds that:

"SPDs should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan. They are however a material consideration in decision-making. They should not add unnecessarily to the financial burdens on development.

Regulations 11 to 16 of the Town and Country Planning (Local Planning) (England) Regulations 2012 set out the requirements for producing SPDs.

In exceptional circumstances an SEA may be required..."

- 1.7 In this case, as discussed, the intention is for the SPD to build upon and provide more detailed advice or guidance on site allocation D-WHA001 (Shenley Park) within the adopted VALP. Within the scope of the SPD will be a strategy for mitigating the impact of new development on the environment.
- 1.8 **Figure 1.1** below shows the location and extent of Shenley Park.

¹ Gov.UK (2021): 'National Planning Policy Framework', [online] available to access via this link

² Gov.UK (2021): 'Plan-making', [online] available to access via this link

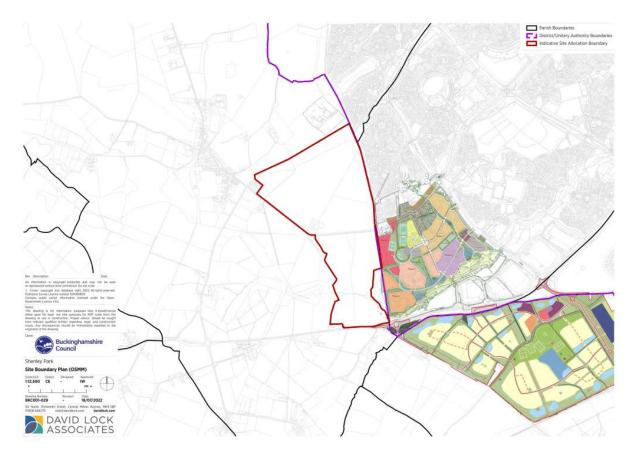


Figure 1.1 Shenley Park

Planning policy context

- 1.9 As mentioned above, Shenley Park (D-WHA001) is an allocated development site under Policy D2 (Delivering site allocations in the rest of Aylesbury Vale) of the adopted VALP, details of which are set out in **Table 1.1** below.
- 1.10 The site is located within Whaddon Civil Parish and lies on the immediate boundary of Milton Keynes. It is approximately 99ha in size and is predominantly in agricultural use, with areas of woodland plantations.
- 1.11 Surrounding land uses are similarly predominantly agricultural, although the eastern boundary is defined by the Milton Keynes Boundary Walk, existing residential areas and land currently being developed as part of Milton Keynes.

Table 1.1 Site allocation D-WHA001 (Shenley Park) from the VALP

Information	Site details
Site reference	WHA001
Size (hectares)	Approximately 99
Allocated for (key developments and land use requirements)	To create an exemplar development, of regional significance, which will be a great place to live, work and grow. Built to a high sustainable design and construction standards, the development will provide a balanced mix of facilities to ensure that it meets the needs and aspirations of new and existing residents. This includes at least 1,150 homes, a 110-bed care home/ extra care facility, a new primary school, a new secondary school (subject to need), multi-functional green infrastructure (in compliance with Policies I1 (Green Infrastructure) and I2 (Sports and Recreation) and associated appendices), a mixed-use local centre, exemplary SuDs, a new

Information	Site details	
	link road between A421 (Buckingham Road) and H6 and or H7 (Childs Way/ Chaffron Way), and public transport and cycling and walking links.	
Source	HELAA	
Current neighbourhood plan status	N/A	
Expected time of delivery	50 homes to be delivered between 2020 and 2025 and 1,100 homes to be delivered between 2025 and 2033.	
Site-specific requirements	Development proposals must be accompanied by the information required in the Council's Local Validation List and comply with all other relevant policies in the Plan. To ensure a comprehensive development of the site an SPD is to be prepared for the site and in addition, proposals should comply with all of the following criteria: a. The site will make provision for at least 1,150 dwellings at a density that	

- a. The site will make provision for at least 1,150 dwellings at a density that respects the adjacent settlement character and identity. To ensure that strong place shaping, community safety and sustainability principles are embedded throughout, creating a socially diverse place with a mix of dwelling types and tenure mix including a minimum of 25% affordable housing 'pepper-potted' throughout the site.
- b. Provision of 110 bed care home/ extra care facility.
- c. Provision of land, buildings and car parking for a 2FE primary school (capacity 420) with 52 place nursery. Infrastructure will need to be provided and phased alongside development, the details of which will be agreed through developer contribution agreements.
- d. Subject to detailed discussions and agreement with the Education Authority, a financial contribution towards existing secondary schools will be required or provision of a site for a new secondary school if the need for an on-site facility is proven, and a financial contribution to special needs education
- e. Provision of land, buildings and car parking for new local centre including community hall and a contribution towards or delivery of a healthcare facility either by way of site provision or direct funding (including temporary buildings if necessary). To create a sustainable community providing a mix of uses to ensure that housing development is accompanied by infrastructure services and facilities.
- f. The site will be designed using a landscape-led and green infrastructure approach. The development design and layout will be informed by a full detailed landscape and visual impact assessment (LVIA) that integrates the site into the landscape and the existing network of green infrastructure within Milton Keynes and Buckinghamshire. It will provide a long-term defensible boundary to the western edge of Milton Keynes. This recognises that whilst being located totally within Aylesbury Vale the development will use some facilities in Milton Keynes, given its proximity. Milton Keynes also provides an access point into the site.
- g. Conserve the setting of Whaddon village and Conservation Area by creating a substantial, well designed and managed countryside buffer (not formal open space) and enhanced Briary Plantation woodland belt between the development and the village of Whaddon.
- h. Create high quality walking and cycling links to and from Whaddon, Bletchley and Milton Keynes as an integral part of the development and shall include an extension of the Tattenhoe Valley Park into the site.
- i. An ecological management plan shall be submitted to and approved in writing by the Council, covering tree planting, hedge planting, pond creation, and ongoing management of the site.

Information Site details

j. Existing vegetation should be retained where practicable, including existing woodlands and hedgerows. Specific attention should be made to enhancing Briary Plantation, Bottlehouse Plantation and other significant blocks of woodlands/ hedgerows within or on the edge of the site.

- k. Hard and soft landscaping scheme will be required to be submitted for Approval.
- Archaeological assessment and evaluation shall be required to be submitted to the Council. Development must minimise impacts on the Statutory Ancient Monument of Site of Snelshall Monastery on the northern boundary of the site.
- m. The scheme layout shall have regard to the findings of an archaeological investigation and preserves in situ any remains of more than local importance.
- The development must provide a satisfactory vehicular access from the A421 Buckingham Road.
- o. More detailed traffic modelling will be required to inform on the extent and design of off-site highway works and to determine whether the section of A421 between the Bottledump roundabout and the site access roundabout needs to be dualled. The scope and design of any detailed traffic modelling must be agreed by Buckinghamshire Council as the highway authority, in consultation with the Milton Keynes highway authority.
- p. Provide for a Link Road connection through the site to Grid Road H6 Childs Way and or H7 Chaffron Way, which shall include:
 - A Redway providing direct connection through the site to the existing Redway Network.
 - A public transport route to incorporate Mass Rapid Transit through the site to Grid Road H6 Childs Way and or H7 Chaffron Way.
- q. Existing public rights of way need to be retained, enhanced and integrated into the development with safe and secure environments as part of a wider network of sustainable routes (utilising amongst others the Redway and Sustrans network), to link the site directly and appropriately with surrounding communities and facilities including the extension of bridleways into the site (Bridleway WHA12/2 and Shenley Brook End Bridleway 006) to Redway Standard.
- Provision of public transport service improvements and associated new facilities into Milton Keynes, including new or improved links to Bletchley railway station, and to surrounding areas.
- s. An air quality and noise assessment shall be submitted to and approved in writing by the Council prior to development commencing.
- t. A surface water drainage strategy will be required for the site, based on sustainable drainage principles and an assessment submitted to the Council for approval and should ensure that development does not increase flood risk elsewhere. The strategy will create new green infrastructure corridors along major surface flowpaths. Development on this site, which would drain into the management area for the Loughton Brook, will seek to reduce flood risk downstream on the Loughton Brook.
- u. Detailed modelling will be required to confirm 1 in 20,100- and 1,000-year extents and 1 in a 100 year plus climate change extents on the ordinary watercourse. Climate change modelling should be undertaken using the up-to-date Environment Agency guidance for the type of development and level of risk. The impact of culvert blockage should be considered for the modelled watercourse. The impacts of climate change must be considered in designing the site's SuDs and in any other flood mitigation measures proposed.

Information Site details

 A foul water strategy is required to be submitted to and approved in writing by the Council following consultation with the water and sewerage undertaker.

- w. An updated assessment of sewerage capacity and water supply network shall be carried out, working with Anglian Water, to identify the need for infrastructure upgrades and how and when these will be carried out to inform site delivery.
- x. The road access to the A421 will be designed to avoid areas of flood zone 3a with climate change and remain operational and safe for users in times of flood.

SEA screening for the Shenley Park SPD

- 1.12 In December 2022, Buckinghamshire Council determined that an SEA process is required for the Shenley Park SPD.
- 1.13 The VALP including Shenley Park was a focus of Sustainability Appraisal (SA) incorporating SEA,³ and it is inherently the case that the SPD will generate limited significant environmental effects over-and-above the VALP allocation.
- 1.14 However, it was decided appropriate to 'screen-in' the SPD i.e. to undertake SEA mindful of environmental sensitivities within and nearby to the site. Most notably, the decision to 'screen-in' was influenced by newly emerged evidence since adoption of the VALP of a Roman Settlement within the site (south of Shenley Road). The SPD will need to incorporate a solution appropriate to the significance of the archaeological remains.
- 1.15 Considering this screening outcome, an SEA process is being undertaken to meet the specific requirements prescribed by Regulations 11 to 16 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

SEA explained

- 1.16 SEA is a mechanism for considering and communicating the potential impacts of an emerging SPD, and reasonable alternatives, in terms of key environmental issues and objectives. The aim is to inform and influence the SPD-making process with a view to avoiding and mitigating potential negative impacts and maximising the positives.
- 1.17 Two key procedural requirements of the SEA Regulations are that:
 - When deciding on 'the scope and level of detail of the information' which must be included in the Environmental Report there is a consultation with nationally designated authorities concerned with environmental issues; and
 - ii. An Environmental Report is published for consultation alongside the draft SPD that presents an assessment of the SPD and reasonable alternatives.
- 1.18 In line with (i), a draft version of this report was published for consultation in early 2023, with consultation responses received from Historic England and Natural England.

³ AECOM (2019): 'Sustainability Appraisal (SA) of the Vale of Aylesbury Local Plan (VALP) SA Report Addendum', [online] available to access via this link. Also, see the VALP SA Adoption Statement via this link.

SEA scoping explained

- 1.19 Developing the scope for the SEA as presented in this report has involved:
 - Exploring the policy context for the Shenley Park SPD and SEA to summarise the key messages arising;
 - Establishing the baseline for the SEA (i.e., the current and future situation in the area in the absence of the Shenley Park SPD);
 - Identifying key problems or opportunities ('issues') that should be a particular focus of the SEA; and
 - Considering this information to develop an SEA framework comprising a series of objectives presented under topic headings.
- 1.20 The scope is explored and presented under a series of environmental topics:
 - Biodiversity and geodiversity
 - Climate change
 - Landscape
 - Historic environment

- Land, soil, and water resources
- · Community wellbeing
- Transportation

2. Biodiversity and geodiversity

Context

- 2.1 The key messages emerging from the review of plans, policies and strategies of relevance to biodiversity and geodiversity are summarised below:
 - The Shenley Park SPD will be required to be in general conformity with the NPPF, which highlights that opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity. This includes using a strategic approach to maintaining and enhancing networks of habitats and green infrastructure at the wider catchment or landscape scale.
 - Support is given through the Framework to establishing coherent ecological networks that are more resilient to current and future pressures. Trees notably make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, and that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards).
 - Over the past decade, policy documents (e.g., The Natural Environment White Paper and Biodiversity 2020) has demonstrated a move away from the traditional approach of protecting biodiversity, to a wider landscape approach to enhancing biodiversity, as part of the overall aims to halt biodiversity loss. The 25 Year Environment Plan places emphasis on improvements to the natural environment; identifying the need to "replenish depleted soil, plant trees, support wetlands and peatlands, rid seas and

rivers of rubbish, reduce greenhouse gas emissions, cleanse the air of pollutants, develop cleaner, sustainable energy and protect threatened species and habitats". Working at a landscape scale transformation is expected to connect habitats into larger corridors for wildlife.

- The Environment Act 2021 sets parameters for biodiversity gain as a condition of planning permission, as well as biodiversity gain site registers and biodiversity credits. The Act identifies a general duty to conserve and enhance biodiversity, including through biodiversity reports and local nature recovery strategies. Local nature recovery strategies will identify biodiversity priorities for the strategy area as well as a local habitat map. Habitat maps are expected to include recovery and enhancement areas which are or could become of importance for biodiversity.
- At the local level, the following policies within the VALP directly relate to the biodiversity and geodiversity topic:
 - NE1 (Biodiversity and Geodiversity) seeks to protect internationally and nationally protected sites and species and protect and enhance biodiversity and geodiversity through a range of measures.
 - NE2 (River and Stream Corridors) aims to prevent development from leading to adverse impacts on the functions and setting of any watercourse and its associated corridor.
 - NE8 (Trees, Hedgerows and Woodlands) outlines that development should seek to enhance and expand Aylesbury Vale's tree and woodland resource, including native black poplars.
 - I1 (Green Infrastructure) supports proposals for green infrastructure as it provides multiple benefits for wildlife and improves access to nature.
- In addition to the above, under Policy D2 (Delivering site allocations in the rest of Aylesbury Vale), the site-specific policy for site allocation D-WHA001 (Shenley Park) states:
 - "i. An ecological management plan shall be submitted to and approved in writing by the council, covering tree planting, hedge planting, pond creation, and ongoing management of the site."
 - "j. Existing vegetation should be retained where practicable, including existing woodlands and hedgerows. Specific attention should be made to enhancing Briary Plantation, Bottlehouse Plantation and other significant blocks of woodlands/ hedgerows within or on the edge of the site."

Baseline

- 2.2 The baseline situation might be considered to comprise a scenario whereby site allocation D-WHA001 (Shenley Park), within Policy D2 (Delivering site allocations in the rest of Aylesbury Vale) of the VALP, is delivered. This scenario is discussed within the SA of the VALP Addendum, which reaches the following overall conclusions:
 - Shenley Park falls within a Biodiversity Opportunity Area (BOA) that
 extends across a cluster of ancient woodland at the southwest extent of
 Milton Keynes and represents the remnants of a former royal hunting
 forest. One of the ancient woodland patches is designated as a nationally

important SSSI. However, this woodland (Howe Park Wood) has already been assimilated within the urban boundary of Milton Keynes (it is located approximately 1km to the east of Shenley Park). Nevertheless, there is a woodland designated as 'ancient woodland' in the north of the site.

- The Buckinghamshire Green Infrastructure Delivery Plan (2013)⁴ identifies the potential benefits that might arise from quite extensive woodland creation within the BOA. In particular, the potential for a large area of habitat creation within or in proximity Shenley Park is identified. Development could potentially facilitate targeted habitat creation, such that there is landscape-scale 'biodiversity net gain'.
- An 'Ecological Headlines' study has examined Shenley Park, relative to other competing sites, and concluded: "With regard to which of the sites could accommodate the allocation proposed with minimised impact to ecological assets, Shenley Park would appear to be more appropriate compared to the Salden Chase Extension and Eaton Leys. The Shenley Park site is situated adjacent to existing development and supports large field parcel features that could accommodate larger blocks of development with minimised hedgerow severance (compared to Salden Extension which has a number of smaller field parcels and hedgerow linkages within it)."
- The study also concludes that issues associated with all of the sites examined, including Shenley Park, can be mitigated "through standard approaches" and also that: "None of the sites have a direct impact on statutory designated sites and the majority have only small areas of notable habitat within or adjacent to the site boundary."
- 2.3 In addition to the discussion presented above, it is noted that Shenley Park is located 270m south of Oxley Mead SSSI. However, as with Howe Park Wood SSSI, this woodland has already been assimilated within the urban boundary of Milton Keynes. The site also contains some very small areas of deciduous woodland which can probably be retained.
- 2.4 Within the site itself there are several small areas of woodland, as well as multiple hedgerows, which could hold biodiversity value.
- 2.5 **Figure 2.1** overleaf provides an overview of the biodiversity and geodiversity constraints in and around the site, as discussed above.

- 2.6 The following key issues emerge from the context and baseline review:
 - Shenley Park is a sensitive location, especially as it falls within a Biodiversity Opportunity Area (BOA) and is in proximity to two SSSIs. However, there is good potential to avoid/ mitigate impacts through habitat creation, which could be achieved through the delivery of strategic new green infrastructure.
 - There might feasibly be the potential to achieve landscape-scale 'biodiversity net gain' above and beyond planning requirements.

⁴ Buckinghamshire and Milton Keynes Natural Environment Partnership (2013): 'Buckinghamshire Green Infrastructure Delivery Plan'. [online] available to access via this link

2.7 In light of the key issues discussed above, it is proposed that the SEA framework should include the following objective:

 Conserve and enhance biodiversity and geodiversity, in line with good ecological practice, by avoiding impacts to designated sites for biodiversity, priority habitats and species, and ancient woodland. In addition, seek to expand ecological networks and increase their inter-connectivity, and achieve biodiversity net gain above and beyond planning requirements. Ensure any avoidance measures are in line with the mitigation hierarchy (avoid, mitigate, compensate).



Figure 2.1 Biodiversity and geodiversity constraints

3. Climate change

Context

- 3.1 The key messages emerging from the review are summarised below:
 - The Shenley Park SPD will be required to be in general conformity with the NPPF, which requires proactive planning to both mitigate and adapt to climate change. Planning policies are expected to improve the resilience of communities and infrastructure to climate change impacts, avoid inappropriate development in the flood plain, and support the move to a low carbon economy. The NPPF recognises the potential for planning to shape places in ways that contribute to radical reductions in greenhouse gas (GHG) emissions, and deliver long-term resilience, including through reuse, regeneration, and conversion.

The Clean Growth Strategy, Clean Air Strategy and the 25-year Environment Plan are a suite of documents which seek to progress the government's commitment under the UK Climate Change Act to becoming net zero by 2050. The documents set out detailed proposals on how the government will tackle all sources of air pollution, whilst maintaining an affordable energy supply and increasing economic growth. This parallels with the 25-year Environment Plan, which further seeks to manage land resources sustainably, recover and reinstate nature, protect soils and habitats, increase resource efficiency, improve water quality, and connect people with the environment. The documents also interlink with the government's commitment to decarbonising transport, a recognised challenge that needs more work in a timely manner if government are to achieve net zero targets. Furthermore, the decarbonisation plan recognises the twinned need to undertake action to adapt the transport sector and increase resilience to climate change risks; and this challenge is more directly addressed through the UK's National Adaptation Programme.

- At the local level, the following policies within the VALP directly relate to the climate change topic:
 - C3 (Renewable Energy) outlines that all development schemes should look to achieve greater efficiency in the use of natural resources.
 - I1 (Green Infrastructure) supports proposals for green infrastructure as it minimises flood risk and supports climate change adaptation.
 - I4 (Flooding) seeks to minimise the impacts of and from all forms of flood risk.
- In addition to the above, under Policy D2 (Delivering site allocations in the rest of Aylesbury Vale), the site-specific policy for site allocation D-WHA001 (Shenley Park) states:
 - "t. A surface water drainage strategy will be required for the site, based on sustainable drainage principles and an assessment submitted to the Council for approval and should ensure that development does not increase flood risk elsewhere. The strategy will create new green infrastructure corridors along major surface flowpaths. Development on this site, which would drain into the management area for the Loughton Brook, will seek to reduce flood risk downstream on the Loughton Brook."
- Moreover, and with regards to climate change mitigation, the site-specific policy for site allocation D-WHA001 (Shenley Park) requires "high sustainable design and construction standards".

Baseline

- 3.2 The baseline situation might be considered to comprise a scenario whereby site allocation D-WHA001 (Shenley Park), within Policy D2 (Delivering site allocations in the rest of Aylesbury Vale) of the VALP, is delivered. This scenario is discussed within the SA of the VALP Addendum, which reaches the following overall conclusions:
 - Shenley Park performs well from a **climate change adaptation** perspective, in that the site contains no areas of fluvial flood risk, and the ribbons of high surface water flood risk that permeate the site are narrow

and could likely be incorporated into open space as necessary. The use of sustainable drainage systems (SuDS) will also help mitigate this risk.

- In terms of climate change mitigation, there is a need to consider the potential for the site to deliver low carbon infrastructure, e.g. a combined heat and power station, associated with a district heating network. The scale of the site indicates that there could be potential to achieve the economies of scale necessary to deliver low carbon infrastructure. However, in practice there may be limited opportunity. It is noted that none of the recent major planning permissions granted at the edge of Milton Keynes require low carbon infrastructure, reflecting viability considerations, i.e. the need to divert limited funds elsewhere.
- 3.3 **Figure 3.1** overleaf provides an overview of flood risk in and around the site.

- 3.4 The following key issues emerge from the context and baseline review:
 - Avoiding surface water flood risk and ensuring good drainage through the use of SuDS is potentially a key climate change adaptation issue.
 - In terms of climate change mitigation, there is a need to ensure low per capita greenhouse gas emissions from the built environment.
 - Also of relevance are the issues and objectives discussed under the transport topic below, as there is the opportunity to ensure low per capital greenhouse gas emissions from transport.
- 3.5 In light of the key issues discussed above, it is proposed that the SEA framework should include the following objective:
 - Reduce the contribution to climate change made by activities within Shenley Park, particularly by minimising per capita greenhouse gas emissions from transport and the built environment in line with the Government's targets for net zero. Seek to realise opportunities for supporting on-site decentralised energy and strategic carbon sequestration.
 - Support the resilience of Shenley Park to the potential effects of climate change, including flooding, by delivering SuDS and other measures with a view to future proofing and climate change resilience. Linked to biodiversity objectives, support the restoration of natural processes and avoid actions that further constrain the natural environment's ability to adapt and be resilient to climate change.

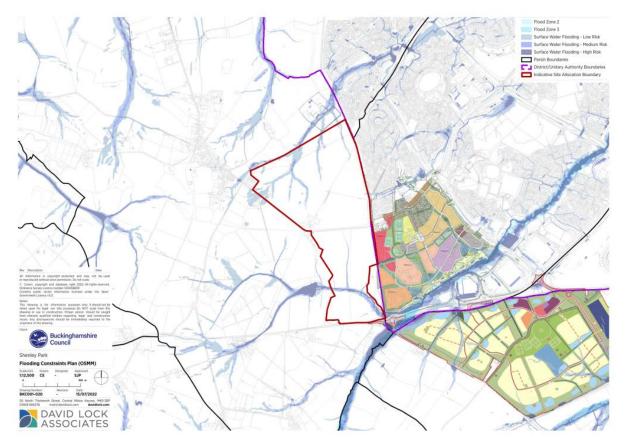


Figure 3.1 Flood risk in and around the site

4. Community wellbeing

Context

- 4.1 The key messages emerging from the review are summarised below:
 - The Shenley Park SPD will be required to be in general conformity with the NPPF, which overall seeks to retain and enhance access to community services and facilities, including health facilities, educational facilities, and open space. The NPPF recognises the benefits of a range of local provisions supporting community needs, including in rural areas. The framework seeks to protect settlement and community identities. Furthermore, the NPPF recognises the benefits of creating cohesive communities, in safe environments where crime and the fear of crime do not undermine the quality of life of residents.
 - The NPPF recognises the role of development plans in helping to deliver access to high quality open spaces and opportunities for sport and physical activity which contribute to the health and wellbeing of communities. The health benefits of access to nature, green spaces and green infrastructure are further reiterated through the 25-year Environment Plan.
 - The 2020 Health Equity in England Report identifies that the health gap between less and more deprived areas has grown in the last decade, where more people can expect to spend more of their lives in poor health, and where improvements to life expectancy have stalled, or even declined.

 The Planning for Sport Guidance seeks to help the planning system provide formal and informal opportunities for everyone to take part in sport and be physically active. The Guidance outlines 12 'planning-for-sport' principles.

- At the local level, the following policies within the VALP directly relate to the community wellbeing topic:
 - H1 (Affordable housing) outlines that residential developments of 11 or more dwellings gross or sites of 0.3ha or more will be required to provide a minimum of 25% affordable homes on site.
 - H6a (Housing Mix) states that new residential development will be expected to provide a mix of homes to meet current and expected future requirements in the interests of meeting housing need and creating socially mixed and inclusive communities.
 - H6b (Housing for Older People) outlines how class C2 older persons' provision will be met through a range of site allocations.
 - H6c (Accessibility) sets out that all development will be required to meet and maintain high standards of accessibility so all users can use them safely and easily.
 - E4 (Working at Home) outlines that partial use of a residential property for business use will be permitted where there are no unacceptable impacts on residential amenity and it would not have an adverse effect on the character of an area, whilst making appropriate provision for access, parking and noise attenuation arising from the business activity.
 - NE6 (Local Green Space) states that where land is identified as local green space on the policies map of a made neighbourhood plan, national policy will be applied. This means that new development will not be permitted other than in very special circumstances.
 - C4 (Protection of Public Rights of Way) outlines that the Council will enhance and protect Public Rights of Way (PRoWs) to ensure the integrity and connectivity of this resource is maintained.
 - I2 (Sports and Recreation) sets out that the Council will support development proposals involving the provision of new sport and recreation facilities that are accessible by pedestrians and cyclists and public transport where available and have no unacceptable impact upon public amenity, the highway network, wildlife and habitats, the historic environment, and flooding or drainage.
 - I3 (Community Facilities, Infrastructure and Assets of Community Value) states that the Council will resist proposals for the change of use of community buildings and facilities for which there is a demonstrable local need, unless the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location.
- In addition to the above, under Policy D2 (Delivering site allocations in the
 rest of Aylesbury Vale), the site-specific policy for site allocation D-WHA001
 (Shenley Park) states that Shenley Park is set to deliver: "a balanced mix of
 facilities to ensure that it meets the needs and aspirations of new and
 existing residents, at least 1,150 homes, 110 bed care home/ extra care

facility, new primary school, subject to need a site for new secondary school, multi-functional green infrastructure (in compliance with Policies I1 and I2 and associated Appendices) [and a] mixed use local centre..."

Site-specific policy for site allocation D-WHA001 (Shenley Park) also aims:

"a. ... To ensure that strong place shaping, community safety and sustainability principles are embedded throughout, creating a socially diverse place with a mix of dwelling types and tenure mix including a minimum of 25% affordable housing 'pepper-potted' throughout the site."

Baseline

- 4.2 The baseline situation might be considered to comprise a scenario whereby site allocation D-WHA001 (Shenley Park), within Policy D2 (Delivering site allocations in the rest of Aylesbury Vale) of the VALP, is delivered. This scenario is discussed within the SA of the VALP Addendum, which reaches the following overall conclusions:
 - The decision to deliver new housing in the north of the former district of Aylesbury Vale through allocation of a single new strategic site is strongly supported, from a 'communities' perspective, given good potential to deliver new community infrastructure alongside housing.
 - However, there potentially remains a degree of uncertainty in respect of secondary school provision. There is a need to avoid children having to travel longer distances to attend school, if possible, but equally Buckinghamshire Council favours larger secondary schools, namely schools that require between 7 and 9 hectares of land. This means that the Council may accept contributions to secondary school expansion, rather than requiring provision of a new secondary school as part of the new development.
 - In terms of the economy, Shenley Park will not serve to deliver any new employment land. However, housing growth in this location may be supportive of employment growth objectives in the local area, noting that the site is located along the east-west corridor, at the southern edge of Milton Keynes, which is an emerging growth corridor.
- 4.3 Notably, Shenley Park falls within Whaddon Civil Parish, which has a population of 520 according to 2021 census data. In this respect, the delivery of 1,150 homes (and a 110-bed care home) at Shenley Park will have a significant impact on the population of Whaddon.
- 4.4 In addition, Shenley Park falls in Aylesbury Vale 003A LSOA, which is amongst the 30% least deprived neighbourhoods in the country in terms of overall deprivation. However, when looking at the 'Living Environment Deprivation' domain in isolation, this LSOA is amongst the 10% most deprived neighbourhoods in the country. Moreover, when looking at the 'Barriers to Housing and Services' domain in isolation, this LSOA is amongst the 30% most deprived neighbourhoods in the country. In this respect, the delivery of new development at Shenley Park will likely improve the quality of the local environment, as well as the physical and financial accessibility of housing and local services by delivering a minimum of 25% affordable housing.

4.5 Also of note is the following conclusion recently reached within the Plan:MK Inspector's Report (2019)⁵ (pg. 14): "There is a scale of growth coalescing around the existing A421 corridor through the Marston Vale, Milton Keynes and through to the Aylesbury Vale. This growth is aligning to the emerging east west corridor containing both East West Rail (EWR) and the Oxford to Cambridge Expressway."

- 4.6 In terms of nearby services and facilities, Whaddon contains one local centre and one primary school, whilst another local centre and primary school can be found in Milton Keynes, near the eastern boundary of the site. The nearest secondary school, pharmacy, GP surgery and supermarket can also be found in Milton Keynes, slightly further away from the site to the northwest.
- 4.7 **Figure 4.1** overleaf provides an overview of the services and facilities and local/ district centres near the site, as discussed above.

- 4.8 The following key issues emerge from the context and baseline review:
 - The latest advice from education specialists is that secondary education needs can be met offsite, and contributions will be sought. However, this is a key matter that will naturally need to be kept under review. There is a need to avoid a need for school children to travel overly far to school.
 - There is no policy requirement to deliver employment land at Shenley Park, however Milton Keynes offers numerous employment opportunities and working from home is supported through policy.
 - The LSOA which Shenley Park falls in is currently amongst the 10% most deprived neighbourhoods in the country with regards to the 'Living Environment Deprivation' domain. Whilst the delivery of new development at Shenley Park is likely to be beneficial in reducing this type of deprivation, this will largely depend on the nature of the development.
- 4.9 In light of the key issues discussed above, it is proposed that the SA framework should include the following objective:
 - Ensure growth in Shenley Park is aligned with the needs of all residents, delivering an accessible development that anticipates future needs and specialist requirements, supporting a cohesive and inclusive community. In addition, support the delivery of multi-functional greenspaces and green infrastructure.

⁵ The Planning Inspectorate (2019): 'Report to Milton Keynes Council', [online] available to access via this link

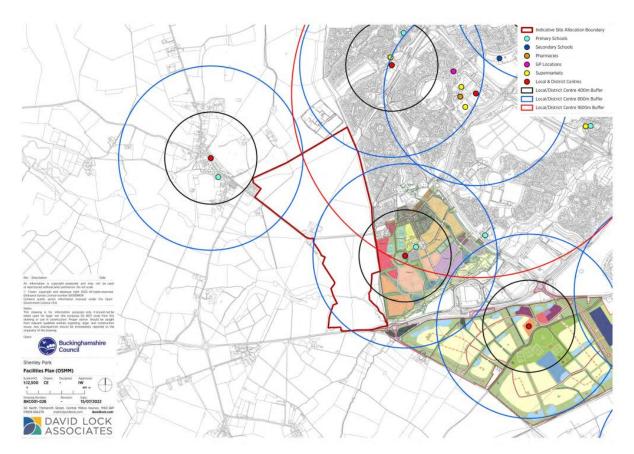


Figure 4.1 Services and facilities and local/ district centres near the site

5. Historic environment

Context

- 5.1 The key messages emerging from the review are summarised below:
 - The key high-level principles for the conservation and enhancement of the historic environment are as follows:
 - The historic environment is a shared resource.
 - Everyone should be able to participate in sustaining the historic environment.
 - Understanding the significance of places is vital.
 - Significant places should be managed to sustain their values.
 - Decisions about change must be reasonable, transparent, and consistent.
 - Documenting and learning from decisions is essential.
 - The significance of places is the key element which underpins the
 conservation and enhancement of the historic environment. Significance is
 a collective term for the sum of all the heritage values attached to a place,
 be it a building, an archaeological site, or a larger historic area such as a
 whole village or landscape.

• The Shenley Park SPD will be required to be in general conformity with the NPPF, which ultimately seeks to conserve and enhance historic environment assets in a manner appropriate to their significance. The NPPF seeks planning policies and decisions which are sympathetic to local character and history without preventing or discouraging appropriate innovation of change. The NPPF supports the use of area-based character assessments, design guides and codes and masterplans to help ensure that land is used efficiently while also creating beautiful and sustainable places.

- As set out in the NPPF, it should be ensured that the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code. Design Codes can set out a necessary level of detail in sensitive locations, for example, with heritage considerations, and they can set out specific ways to maintain local character.
- Planning Practice Guidance expands on the NPPF recognising the proactive rather than passive nature of conservation.
- The role of the historic environment, as part of healthy and thriving ecosystems, landscapes, and cultural values, including settlement identity, is reiterated through the key messages of the 25 Year Environment Plan and National Design Guide.
- Historic England's Advice Notes provide further guidance in relation to the conservation and enhancement of the historic environment. Of relevance for the Shenley Park SPD is the emphasis on the importance of:
 - Understanding the different types of special architectural and historic interest which underpin designations, as well as how settings and/or views contribute to the significance of heritage assets.
 - Recognising the value of implementing controls through neighbourhood plans, conservation area appraisals and management plans.
 - Appropriate evidence gathering, including clearly identifying those issues that threaten an area or assets character or appearance and that merit the introduction of management measures.
- In addition to conserving the historic environment, the Shenley Park SPD should seek to identify opportunities to enhance the fabric and setting of the historic environment. It should also seek to rejuvenate features and areas which are at risk of neglect and decay.
- At the local level, the following policies within the VALP directly relate to the historic environment topic:
 - BE1 (Heritage Assets) seeks to preserve and enhance the historic environment, which is unique in its character, quality and diversity across the Vale. All development, including new buildings, alterations, extensions, changes of use and demolitions, should seek to conserve heritage assets in a manner appropriate to their significance, including their setting, and seek enhancement wherever possible.
 - BE2 (Design of New Development) outlines that all new development proposals shall respect and complement the physical characteristics of

the site and its surrounding, the local distinctiveness and vernacular character of the locality, the natural qualities and features of the area, and the effect on important public views and skylines.

- In addition to the above, under Policy D2 (Delivering site allocations in the rest of Aylesbury Vale), the site-specific policy for site allocation D-WHA001 (Shenley Park) states:
 - "g. Conserve the setting of Whaddon village and Conservation Area by creating a substantial, well designed and managed countryside buffer (not formal open space) and enhanced Briary Plantation woodland belt between the development and the village of Whaddon.
 - I. Archaeological assessment and evaluation shall be required to be submitted to the Council. Development must minimise impacts on the Statutory Ancient Monument of Site of Snelshall Monastery on the northern boundary of the site.
 - m. The scheme layout shall have regard to the findings of an archaeological investigation and preserves in situ any remains of more than local importance."

Baseline

- 5.2 The baseline situation would involve site allocation D-WHA001 (Shenley Park), within Policy D2 (Delivering site allocations in the rest of Aylesbury Vale) of the VALP, is delivered. This scenario is discussed within the SA of the VALP Addendum, which reaches the following overall conclusions:
 - A Heritage Appraisal was undertaken as part of the VALP process, finding that there are no designated heritage assets within the Shenley Park boundary. However, a total of nine non-designated heritage assets are recorded within the site boundary (two findspots, five monuments and two archaeological notification areas). In addition, there is high potential for encountering both recorded and previously unrecorded archaeological remains within the site.
 - Development of the site also has the potential to affect the setting of a number of designated heritage assets located around the site. These include the listed buildings associated with the Whaddon Conservation Areas, including grade I listed building 'Church of St Mary' and scheduled monument 'A bowl barrow on Church Hill 200m south of church'. Notably, one of the conservation areas borders the northwestern corner of the site.
- 5.3 In addition to the above, Shenley Park is located 10m south of scheduled monument 'Snelshall Benedictine Priory: a moated priory site and fishponds north of Briary Plantation'. This area is also covered by an archaeological notification area, which spans a larger area than the scheduled monument and contains several non-designated findspots and monuments.
- 5.4 The site is 60m west of a grade II listed building off the Canterbury Meadows cul-de-sac in Milton Keynes.
- 5.5 The southern half of the site is 90m east of another archaeological notification area, which also contains a non-designated monument.

5.6 There are multiple areas of 'ridge and furrow' located near the site, particularly around Whaddon village, which also contains one non-designated findspot and multiple non-designated buildings and monuments.

- 5.7 A Roman Road (Buckingham Road) borders the site to the south, whilst another (no-longer in use) runs 85m north of the site.
- 5.8 Since the VALP was adopted, the Council's heritage colleagues, alongside Historic England, have established that there is a Roman Settlement within the sites boundary, to the south of Shenley Road. Work is ongoing to establish the significance of the asset, but this is undoubtedly a key constraint.
- 5.9 **Figure 5.1** overleaf provides an overview of the heritage assets in and around the site. as discussed above.

- 5.10 The following key issues emerge from the context and baseline review:
 - There are several historic constraints associated with the site, the most significant being the archaeological remains within the site boundary as well as a nearby scheduled monument.
 - There is a need to respect the historic character of nearby Whaddon, which contains several listed buildings, and parts of which are covered by a conservation area.
- 5.11 In light of the key issues discussed above, it is proposed that the SEA framework should include the following objective:
 - Conserve and enhance the historic environment within and surrounding Shenley Park, with a focus on designated heritage assets, but also non-designated assets and historic character. Consider links to landscape, place-making and other objectives.
- 5.12 Indicators used by the SEA to assess whether this objective has been met include the following:
 - Are proposals likely to harm the setting of adjacent heritage assets?
 - Are proposals likely to harm archaeological remains within the site boundary?
 - Do proposals respond positively to the location's history and heritage assets?

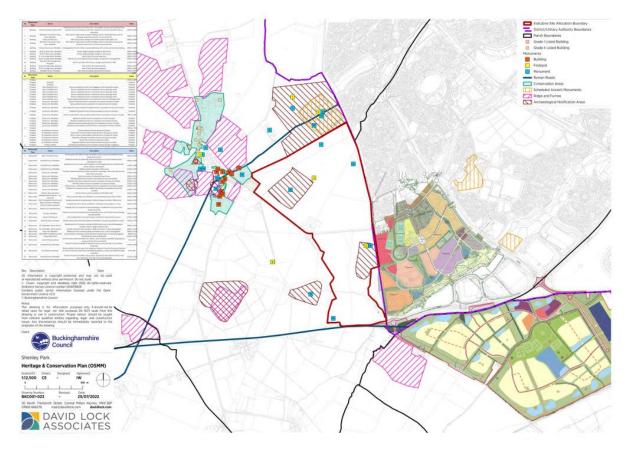


Figure 5.1 Heritage assets in and around the site

6. Landscape

Context

- 6.1 The key messages emerging from the review are summarised below:
 - The Shenley Park SPD will be required to be in general conformity with the NPPF which gives great weight to conserving and enhancing protected landscapes, as well as landscape character and scenic beauty. The scale and extent of development within these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.
 - The NPPF recognises the role of green infrastructure in landscape settings, as well as the importance of designated biodiversity sites, habitats, woodland, historic features, agricultural land, and cultural landscapes. The positive contribution that land remediation can make in terms of addressing despoiled, degraded, derelict, contaminated and unstable land is also recognised.
 - The 25-year Environment Plan and National Design Guide complement each other with their aims for a cleaner, greener country which puts the environment first and celebrates the variety of natural landscapes and habitats. Design is focused on beautiful, enduring, and successful places, which respond to local character and provide a network of high quality green open spaces.

 At the local level, the following policies within the VALP directly relate to the landscape topic:

- BE2 (Design of New Development) outlines that all new development proposals shall respect and complement the physical characteristics of the site and its surrounding, the local distinctiveness and vernacular character of the locality, the natural qualities and features of the area, and the effect on important public views and skylines.
- NE3 (The Chilterns AONB and Setting) sets out that permission for major developments affecting the AONB will be refused unless exceptional circumstances prevail as defined by national planning policy. However, it is noted that Shenley Park is not near the AONB.
- NE4 (Landscape Character and Locally Important Landscape) outlines that development must recognise the individual character and distinctiveness of particular landscape character areas set out in the Landscape Character Assessment (LCA), their sensitivity to change and contribution to a sense of place.
- NE8 (Trees, Hedgerows and Woodlands) sets out that development should seek to enhance and expand Aylesbury Vale's tree and woodland resource, including native black poplars.
- In addition to the above, under Policy D2 (Delivering site allocations in the rest of Aylesbury Vale), the site-specific policy for site allocation D-WHA001 (Shenley Park) states:
 - "f. The site will be designed using a landscape-led approach. The development design and layout will be informed by a full detailed landscape and visual impact assessment (LVIA). It will provide a long-term defensible boundary to the western edge of Milton Keynes. This recognises that whilst being located totally within Aylesbury Vale, the development will use some facilities in Milton Keynes, given its proximity. Milton Keynes also provides an access point into the site."

Baseline

- 6.2 The baseline situation might be considered to comprise a scenario whereby site allocation D-WHA001 (Shenley Park), within Policy D2 (Delivering site allocations in the rest of Aylesbury Vale) of the VALP, is delivered. This scenario is discussed within the SA of the VALP Addendum, which reaches the following overall conclusions:
 - Shenley Park was examined through a Strategic Landscape and Visual Capacity Study (2017), which found around 35% of the site to be suitable for development on the basis of sensitivity within the landscape. However, it recognizes that there is potential to minimize adverse effects through retaining and enhancing existing areas of perimeter woodland.
 - This 35% was then contested at the VALP examination and the examiner concluded: "It is clear to me that the Council's Landscape Study has indicated a way in which development of the whole allocation could be made acceptable, which would remove any suspicion that the allocation could not deliver the quantity of development expected of it."

• It is noted that development of this site will be guided by the SPD. However, it is nonetheless recommended that site-specific policy might 'go further' by specifying broad areas within the site that are more sensitive, from a landscape perspective.

- 6.3 In addition to the above, it is noted that Shenley Park is near the settlement of Whaddon and has potential to lead to the coalescence of Milton Keynes and Whaddon. However, it is noted that there is a requirement to provide a landscaped separation between Whaddon and Shenley Park. In addition, visual connectivity between Whaddon and the site is very limited due to the layout of the village, the topography in this area, and existing mature vegetation.
- 6.4 Expanding upon topography, the northern parcel of Shenley Park is generally flat, sloping gently to the north. Trees are generally limited to the edges of the parcel, and views are relatively contained. The southern parcel is sloped, defined by north-south and east-west valley profiles. This parcel has more tree and hedgerow cover within, and views are generally contained within the site, although the northern part is exposed to long-distance views to the south.

 Figure 6.1 overleaf provides an overview of topography in and around the site.
- 6.5 More broadly, the site falls wholly within and consists of the south eastern extent of Whaddon Chase Landscape Character Type (LCT), the overall landscape character is one of sloping ground which drains from the A421 ridge toward the Great Ouse catchment. The key characteristic of this LCT is the incised valley with irregular shaped fields and extensive woodland cover, of note is Whaddon village, which is located on local promontory, with the landscape historically consisting of C18th C19th Parliamentary Enclosure.
- 6.6 The published landscape character assessments consider condition of the landscape within Whaddon Chase LCT to be 'very good', whilst its sensitivity is considered to be 'high'. However, with respect to the site alone, the value of the landscape is considered to be 'low' due to it being typical of the wider arable landscape in the district. In addition, the susceptibility of the landscape to accept development is considered to be 'medium' due to the level of containment provided by existing mature vegetation. Overall, the landscape of the site is considered to have a 'medium' sensitivity to development.

- 6.7 The following key issues emerge from the context and baseline review:
 - There is a need to protect important views and avoid any risk of coalescence or loss of separation/ distinction between settlements, particularly with respect to Whaddon.
 - The LCT which Shenley Park falls within has a 'high' landscape sensitivity, and in this respect, development at this site has potentially to drastically change the local landscape. However, the site itself is only considered to have a 'medium' landscape sensitivity.
- 6.8 In light of the key issues discussed above, it is proposed that the SEA framework should include the following objective:

 Protect and enhance the character, quality and setting of the immediate and surrounding landscape and villagescape/ townscape, by delivering a well-designed new community with minimal landscape impacts, utilising green infrastructure and preserving important open gaps between existing settlements.

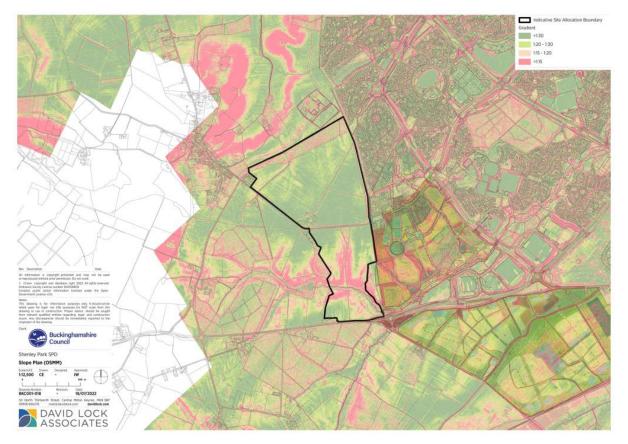


Figure 6.1 Topography in and around the site

7. Land, soil and water resources

Context

- 7.1 The key messages emerging from the review are summarised below:
 - The Shenley Park SPD will be required to be in general conformity with the NPPF, which seeks to protect high quality soil resources, and improve the water environment; recognising the wider benefits of natural capital and derived from ecosystem services. Furthermore, the NPPF recognises the need to take account of the long-term implications of climate change and build resilience in this respect. The NPPF encourages efficient land use, utilising brownfield land opportunities and land remediation schemes where appropriate and delivering environmental gains.
 - The 25-year Environment Plan presents a focus for environmental improvement in the next couple decades, with aims to achieve clean air, clean and plentiful water, and reduced risk from environmental hazards. This includes measures to improve soil quality, restore and protect peatlands, use water more sustainably, reduce pollution, maximise

resource efficiency and minimise environmental impacts. This leads on from and supports the soil strategy for England (Safeguarding our soils) which seeks to ensure that all England's soils will be managed sustainably, and degradation threats tackled successfully by 2030, as well as the national water strategies which seek to secure sustainable and resilient water resources and improve the quality of waterbodies, and the national waste plan which seeks to identify measures being taken to move towards a zero-waste economy.

- At the local level, the following policies within the VALP directly relate to the land, soil and water resources topic:
 - S7 (Previously Developed Land) outlines that development in Aylesbury Vale will be expected to make efficient and effective use of land. The Council will encourage the reuse of previously developed (brownfield) land in sustainable locations, subject to site-specific considerations including environmental value and the impact on local character, and subject to other policies in the Local Plan.
 - NE5 (Pollution, Air Quality and Contaminated Land) sets out that development on or near land that may be affected by contamination will only be permitted where an appropriate contaminated land assessment has been carried out as part of the application to identify any risks to human health, the natural environment or water quality.
 - NE7 (Best and Most Versatile Agricultural Land) states that subject to the development allocations set out in the VALP, the council will seek to protect 'best and most versatile' BMV) agricultural land for the longer term. Proposals involving development of agricultural land shall be accompanied by an assessment identifying its grade (1 to 5) with regards to the Agricultural Land Classification (ALC). Where development involving BMV agricultural land (Grades 1, 2 and 3a) is proposed, those areas on site should be preferentially used as green open space and built structures avoided
 - I5 (Water Resources and Wastewater Infrastructure) outlines that the Council will seek to improve water quality, ensure adequate water resources, promote sustainability in water use and ensure wastewater collection and treatment has sufficient capacity.
- In addition to the above, under Policy D2 (Delivering site allocations in the rest of Aylesbury Vale), the site-specific policy for site allocation D-WHA001 (Shenley Park) states:
 - "v. A foul water strategy is required to be submitted to and approved in writing by the council following consultation with the water and sewerage undertaker.
 - w. An updated assessment of sewerage capacity and water supply network shall be carried out, working with Anglian Water, to identify the need for infrastructure upgrades and how and when these will be carried out to inform site delivery."

Baseline

7.2 The baseline situation might be considered to comprise a scenario whereby site allocation D-WHA001 (Shenley Park), within Policy D2 (Delivering site allocations in the rest of Aylesbury Vale) of the VALP, is delivered. This scenario is discussed within the SA of the VALP Addendum, which reaches the following overall conclusions:

- Detailed survey data indicates that Shenley Park is underlain by Grade 3b agricultural land, i.e. land that is not classed as BMV agricultural land.
 Therefore, although the majority of the site appears to currently be in productive agricultural use and development would necessitate the cessation of this, this would not represent the loss of productive agricultural land.
- With regards to Wastewater Treatment Works (WwTW) capacity, the Aylesbury Vale Water Cycle Study Addendum: Additional Sites (2019) did not highlight any concerns, finding that:

"It is therefore concluded that planned growth in Aylesbury Vale served by Cotton Valley WwTW could be accommodated without impacting on water quality if the environmental permit for ammonia were tightened to achieve a 10% improvement over current concentrations at the point of mixing.

Anglian Water have confirmed that the required permit variation is achievable. The contribution of growth in Aylesbury Vale (1,200 homes) has been demonstrated to be negligible when compared to the contribution of growth from Milton Keynes (29,981 homes). Anglian Water has recently published a Water Recycling Long-Term Plan. This recognises the significant growth expected in and around Milton Keynes, and identifies sewer capacity investment for AMP7 2020-2025, subject to approval of the Business Plan by industry regulator OfWAT."

- 7.3 The following key issues emerge from the context and baseline review:
 - Although the current use of the land proposed for the development of Shenley Park is agricultural, this is not BMV land.
 - The SPD should consider how Shenley Park will affect water supply, including as water accessibility issues, and ensure that appropriate drainage infrastructure is in place to accommodate development.
- 7.4 In light of the key issues discussed above, it is proposed that the SA framework should include the following objective:
 - Ensure the efficient and effective use of land, including a focus on avoiding the loss of BMV agricultural land as far as possible, and protect and enhance water quality, managing water resources in a sustainable manner.

8. Transportation

Context

8.1 The key messages emerging from the review are summarised below:

- The Shenley Park SPD will be required to be in general conformity with the NPPF, which seeks the consideration of transport issues from the earliest stages of plan-making and development proposals to address any known issues and maximise opportunities to increase accessibility, particularly by walking, cycling and public transport. Larger developments are expected to be delivered in areas which are or can be made sustainable by limiting the need to travel and offering a genuine choice of transport modes. However, it is recognised that sustainable transport solutions will vary between urban and rural environments.
- National transport strategies set out investment priorities which ultimately all seek to improve the connectivity, effectiveness and reliably of transport networks, whilst reducing impacts on the natural environment (including through decarbonisation). Furthermore, they place great emphasis on making cycling and walking the natural choice for shorter journeys, or as part of a longer journeys. This includes investment in new and upgraded infrastructure, changing perceptions, and increasing safety.
- At the local level, the following policies within the VALP directly relate to the transportation topic:
 - T5 (Delivering Transport in New Development) outlines that transport and new development will only be permitted if the necessary mitigation is provided against any unacceptable transport impacts which arise directly from that development.
 - T6 (Vehicle Parking) sets out that all development must provide an appropriate level of car parking, in accordance with the standards set out in Appendix B of the VALP.
 - T7 (Footpaths and Cycle Routes) lists criteria that will apply to development which will have implications for the footpath and cycle route networks.
 - T8 (Electric Vehicle Parking) sets out that new developments will provide parking bays and charging points for electric vehicles.
 - C4 (Protection of Public Rights of Way) outlines that the council will enhance and protect public rights of way to ensure the integrity and connectivity of this resource is maintained.
 - NE5 (Pollution, Air Quality and Contaminated Land) states that developments requiring planning permission that may have an adverse impact on air quality will be required to prove through a submitted air quality impact assessment.
- In addition to the above, under Policy D2 (Delivering site allocations in the rest of Aylesbury Vale), the site-specific policy for site allocation D-WHA001 (Shenley Park) has been developed with a view to avoiding negative

transport/ traffic impacts, and realising opportunities, stating, amongst other things, that:

"q. Existing public rights of way need to be retained, enhanced and integrated into the development with safe and secure environments as part of a wider network of sustainable routes (utilising amongst others the Redway and Sustrans network), to link the site directly and appropriately with surrounding communities and facilities

r. Provision of public transport service improvements and associated new facilities into Milton Keynes, including new or improved links to Bletchley railway station, and to surrounding areas."

Baseline

- 8.2 The baseline situation might be considered to comprise a scenario whereby site allocation D-WHA001 (Shenley Park), within Policy D2 (Delivering site allocations in the rest of Aylesbury Vale) of the VALP, is delivered. This scenario is discussed within the SA of the VALP Addendum, which reaches the following overall conclusions:
 - Shenley Park performs well in the sense that it is located at the edge of Milton Keynes, which is a major employment location. Furthermore, the site has good potential to gain access to/ from both a Milton Keynes Grid Road (Grid Road H6 and /or H7) and onto the A421 to the south (although an access road could create tensions in respect of landscape objectives, and potentially also has a bearing on viability with knock on implications for secondary school provision). The site also links well to the existing network of Redways (shared-use paths) within Milton Keynes.
 - It is recognised that Shenley Park will introduce new road users and
 associated transport emissions. However, there are no AQMAs in Milton
 Keynes, nor in Buckingham or Winslow. Site specific policy notably
 requires that: "An air quality and noise assessment shall be submitted to
 and approved in writing by the Council prior to development commencing."
- 8.3 Expanding on the above, and with a focus on PRoWs, there is public access into the southern parcel via footpath WHA/17/1, which runs diagonally across the parcel from Shenley Road, adjacent to New Bare House, to the woodland adjacent to the eastern boundary. In addition, there are a number of PRoWs which join or run adjacent to the site boundary to include the Milton Keynes Boundary Walk LDR, Shenley Brook End BW 006 & 009, which run adjacent to the eastern boundary, and North Buckinghamshire Way / Midshires Way LDRs, which run adjacent to the northern boundary. In this respect, the site has potential to utilise existing PRoWs to encourage walking.
- 8.4 The nearest bus stops to the site are located in Whaddon and Milton Keynes, to the northeast of the site. However, given the scale of the site, it is possible that new bus stops will be delivered at the site. **Figure 8.1** overleaf provides an overview of the bus stops and PRoWs in and around the site.

- 8.5 The following key issues emerge from the context and baseline review:
 - There is an opportunity to support modal shift; however, this is dependent on the delivery of new and upgraded transport infrastructure. Assuming good walking and cycling links both within the site and between the site and Milton Keynes, there should be a very high incidence of walking and cycling to work.
 - Whilst public transport is mentioned in the site description, it is not clear what this will entail, and therefore a degree of uncertainty remains here.
- 8.6 In light of the key issues discussed above, it is proposed that the SA framework should include the following objective:
 - Support the achievement of modal shift from private car use to public and active transport, including through the layout and design of development.

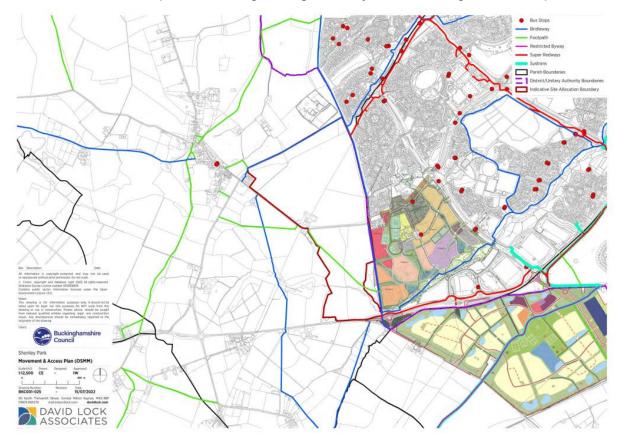


Figure 8.1 Bus stops and PRoWs in and around the site

9. The SEA framework

9.1 The SEA framework is presented below.

Table 9.1: The SEA framework

Topic	Objective(s)	
Biodiversity and geodiversity	Conserve and enhance biodiversity by avoiding impacts to designated sites, ancient woodland and other priority habitats; seek to achieve a suitable level biodiversity net gain. Also consider geodiversity.	
Climate change	Reduce the contribution to climate change made by activities within Shenley Park, particularly by minimising per capita greenhouse gas emissions from transport and the built environment in line with the Government's targets for net zero. Seek to realise opportunities for supporting on-site decentralised energy and carbon sequestration.	
	Support the resilience of Shenley Park to the potential effects of climate change, including flooding. Linked to biodiversity objectives, support restoration of natural processes and avoid actions that further constrain the natural environment's ability to respond to change.	
Community wellbeing	Ensure growth in Shenley Park is aligned with the needs of all residents, delivering an accessible development that anticipates future needs and specialist requirements, supporting a cohesive and inclusive community.	
Historic environment	Conserve and enhance the historic environment with a focus on designated heritage assets, but also non-designated assets and historic character. Consider links to landscape and place-making objectives.	
Landscape	Protect and enhance landscape and village/rural character, by delivering a well-designed new community, utilising green infrastructure and preserving important open gaps between existing settlements.	
Land, soil, and water resources	Ensure the efficient use of land, including avoiding the loss of high-quality agricultural land; protect and enhance water quality and water resources.	
Transportation	Support the achievement of modal shift from private car use to public and active transport, including through the layout and design of development.	

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