

Strategic Environmental Assessment (SEA) of the Buckingham Neighbourhood Plan

Environmental Report Update

December 2024

Table of Contents

Non-technical summary.....	i
1. Introduction	1
2. The plan scope	2
3. The SEA scope	3
Part 1: What has plan-making / SA involved up to this stage?	4
4. Introduction to Part 1.....	5
5. Defining growth scenarios.....	6
6. Growth scenarios assessment.....	14
7. The preferred approach	16
Part 2: SA findings at this stage?	17
8. Introduction to Part 2.....	18
9. Appraisal of the Buckingham NPR.....	18
Part 3: Next steps.....	25
10. Plan finalisation.....	26
11. Monitoring	26
Appendix I: Legal checklist.....	28
Appendix 2: High level growth scenarios.....	31

Non-technical summary

This report aims to present an assessment of the current ('submission') version of the Buckingham Neighbourhood Plan Review (NPR) and also 'reasonable alternatives'. Specifically:

- Part 1 deals with reasonable alternatives. Specifically, Section 5 defines reasonable alternatives before Section 6 presents an assessment and then Section 7 presents the response of the plan-makers to the assessment (and, in turn, an explanation of why the preferred option is supported, on balance, in light of the assessment).
- Part 2 presents an assessment of the NPR as a whole (where an assessment amounts to a discussion of 'significant effects' structured under a list of topic/objective headings, known as the SEA 'framework').
- Part 3 discusses next steps, and specifically explains that following the current consultation the aim is for the NPR to be subjected to an independent examination (overseen by an appointed examiner), as part of which account will be taken of this report and all consultation responses received.

With regards to the assessment of reasonable alternatives, the specific focus is on an assessment of three alternative 'growth scenarios', which more specifically comprise alternative approaches to providing for housing and employment land needs over the plan period. The following three growth scenarios are assessed:

- Scenario 1 – constants plus Site Q = total supply of 754 homes
- Scenario 2 – constants plus Site M = total supply of 1,254 homes
- Scenario 3 – constants plus Site Q and Site M = total supply of 1,754 homes

The plan-maker's response to the assessment is then as follows:

"Scenario 2 is taken forward as the preferred scenario. This involves: allocation of Site M for 800 homes and other uses including a primary school and a local centre; allocation of eleven other smaller sites for residential-led development; and ongoing support for 10 ha of new employment land at Site Q.

The assessment lends clear support for this approach, with particular weight placed on the benefits of Scenario 2 relative to the two alternative scenarios under the 'accessibility' and 'economy/employment' headings. It is recognised that there is a 'landscape' argument for supporting Scenario 1, in that this might be seen as a strategy that minimises greenfield land take. However, taking a long term perspective it is not clear that this is the case because in the fullness of time – and potentially in the near future through the emerging Buckinghamshire Local Plan – Site M would likely come under pressure for development in any case (i.e. even if the NPR were to support Scenario 1) and there could well be a need to allocate significant new land for employment at Buckingham to make good the loss at Site Q."

With regards to the assessment of the NPR as a whole, the assessment predicts positive effects under the majority of headings, but there are some inherent tensions with climate change adaptation (flood risk) and agricultural land objectives. The most significant benefits of the NPR are around proactively planning for new homes (although a recommendation is made around ensuring clarity around the distinction between potential supply and committed supply), transport objectives (although there is a need to maintain a watching brief, and there are ongoing challenges around A421 severance) and economy / employment objectives.

1. Introduction

1.1. Background

- 1.1.1. AECOM is leading on Strategic Environmental Assessment (SEA) in support of the Buckingham Neighbourhood Plan Review 2024-2040 that is being prepared by Buckingham Town Council.
- 1.1.2. Once adopted ('made' part of the development plan), the Neighbourhood Plan Review (NPR) will hold material weight when deciding on planning applications in the Town Council alongside the latest adopted Local Plan for the Buckinghamshire. The NPR must be in 'general conformity' with the Local Plan.
- 1.1.3. SEA is a mechanism for considering and communicating the environmental and wider sustainable development effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. SEA is a requirement for the NPR (following a 'screening' process).

1.2. SEA explained

- 1.2.1. It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 ('the SEA Regulations').
- 1.2.2. In-line with the Regulations, a report (the **Environmental Report**) must be published for consultation alongside the draft plan that presents an assessment of "the plan and reasonable alternatives". The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 1.2.3. More specifically, the report must answer the following **three questions**:
- What has Plan-making / SEA involved **up to this point**?
... including in respect of reasonable alternatives
 - What are the SEA findings **at this stage**?
... i.e. in relation to the draft plan
 - What are **next steps**?

1.3. This SA Report Update

- 1.3.1. The formally required Environmental Report was published alongside the 'pre-submission' version of the NPR earlier in 2024 under Regulation 14 of the Neighbourhood Planning Regulations.
- 1.3.2. This Environmental Report Update is prepared in order to be published alongside the submission version of the NPR under Regulation 16, following which the NPR will be subjected to an independent examination (as part of which account will be taken of all representations made under Regulation 16).
- 1.3.3. This report has precisely the same aims as the earlier Environmental Report but aims to bring analysis up-to-date by: A) revisiting work on reasonable alternatives; B) accounting for adjustments made to the plan; and C) generally accounting for the latest evidence. Appendix I presents a regulatory checklist in order to demonstrate that this report presents all of the information required under legislation.

Structure of this report

- 1.3.4. This report is structured in **three parts** in order to answer the questions above in turn, specifically:
- Part 1 – presents information on reasonable alternatives
 - Part 2 – presents an assessment of the draft plan
 - Part 3 – discusses next steps
- 1.3.5. Ahead of Part 1, there is a need for two further introductory sections:
- Section 2 – introduces the plan scope.
 - Section 3 – introduces the SA scope.

2. The plan scope

2.1.1. The following plan objectives are unchanged from the previous pre-submission version of the plan:

- Conserve and enhance the town’s historic environment and its setting.
- Provide maximum clarity about design expectations through a new Design Code building on the work of the 2001 Vision & Design Statement.
- Encourage development that strengthens culture, leisure, sport, and play facilities in the town.
- Promote measures to improve the health of people living and working in Buckingham including the provision and retention of facilities locally.
- Maintain the quality of Buckingham’s parkland and green space, in particular its ‘green heart’.
- Foster the economic development of the town and its hinterland by providing employment led growth, increasing the town’s appeal to tourists and invigorating the town centre.
- Help enable effective education across all tiers in Buckingham and ensure that links to and from the local economy are established.
- Provide a diverse housing stock to meet the needs of existing and future local people.
- Secure Developer Contribution from (previously stated as: “the financial uplift of”) new development for the benefit of the local community through developer contributions, New Homes Bonus and/ or Community Infrastructure Levy.
- Improve movement into and around the town in a healthy and safe manner; specifically cycling, walking and ease of access for the disabled.
- Encourage a reduction in the carbon footprint of Buckingham by promoting energy efficiency and renewable energy generation.
- Mitigate, and improve the capability of the town to deal with flooding.

2.1.2. Crucially, the plan must be in general conformity with the strategic policies of the Vale of Aylesbury Local Plan (VALP) adopted by Buckinghamshire Council in 2021. This includes the VALP’s expectation that growth in Buckingham will be neighbourhood planning-led (§8 of the Spatial Vision).

2.1.3. The issue is that the VALP looks only to 2033, whilst there is a need to ensure a strategic approach to development that looks further ahead. This suggests a need to support growth through the NPR with the aim of providing for needs and the achievement of wider objectives to 2040, and another motivation for supporting growth through a neighbourhood plan comes in the form of NPPF paragraph 14.

2.1.4. Equally though, Buckinghamshire Council is bringing forward a new Local Plan to cover a period that will extend well beyond 2040. The implication is that the Buckingham NPR must be prepared in the knowledge that new strategic direction is forthcoming, and work by Buckinghamshire Council to set this new strategic direction must not be unduly hindered or prejudiced by the NPR (e.g. foreclosing options).

2.1.5. These matters have been explored with Buckinghamshire Council, including through the pre-submission consultation held earlier in 2024. The latest situation is that Buckingham Council has provided a housing requirement for the plan period (2024 – 2040) of 1,100 homes, which aligns with the proposed approach to growth previously set out in Pre-submission NPR. It should be noted that this figure involves housing growth over-and-above that which is set to come forward at existing permitted sites.

2.1.6. It is recognised that the Local Plan may direct additional growth to Buckingham, and there is a strong desire to ensure that all future growth is planned for comprehensively, as opposed to a situation whereby sites are identified for development in a piecemeal fashion with opportunities missed to secure benefits, including in terms of targeted investment in new and upgraded strategic infrastructure. However, the assigned housing requirement figure is considered to strike an appropriate balance.

3. The SEA scope

3.1. Introduction

- 3.1.1. The scope of the SEA refers to the breadth of issues and objectives that are taken into account as part of the assessment of reasonable alternatives and the emerging plan. It does not refer to the scope of the plan (discussed above) or the scope of reasonable alternatives (discussed in Part 1).
- 3.1.2. The aim here is to introduce the reader to the *broad scope* of the SEA. Further information is presented in a stand-alone Scoping Report (2024); however, it is important for the SEA scope to remain flexible, responding to the emerging plan and reasonable alternatives, and the latest evidence-base.

3.2. Consultation on the scope

- 3.2.1. The regulatory requirement is that: *“When deciding on the scope and level of detail of the information that must be included in the [SA Report], the responsible authority shall consult the consultation bodies.”* As such, the consultation bodies – the Environment Agency, Historic England and Natural England – were consulted on the SA scope in 2023/24. The SEA scope was also set out in Section 3 of Environmental Report published earlier in 2024, and now comments were received at that time.

3.3. The SEA framework

- 3.3.1. The outcome of scoping work in 2023/24 was an SEA ‘framework’ comprising 13 topics, each with an associated objective. The framework aims to ensure systematic yet focused and concise assessment.

Table 3.1: The SEA framework

SEA theme	SEA objective(s)
Accessibility (to community infrastructure)	Improve access to community infrastructure for new and existing residents.
Air quality	Support objectives to improve air quality within and surrounding the neighbourhood area.
Biodiversity	Protect and enhance biodiversity and geodiversity.
Climate change adaptation	Increase the resilience of the neighbourhood area to the potential effects of climate change and protect water quality.
Climate change mitigation	Reduce the contribution to climate change made by activities within the neighbourhood area.
Communities and wellbeing	Ensure growth in the neighbourhood area protects settlement identities and the health and wellbeing of residents and supports cohesive and inclusive communities.
Economy and employment	Ensure the long-term vitality of Buckingham Town Centre and promote continued growth in Buckingham’s employment, retail, and tourism offer.
Historic environment	Protect, conserve, and enhance the historic environment within and surrounding the neighbourhood area.
Homes	Ensure housing growth in the neighbourhood area is aligned with the needs of all residents, improving accessibility, and anticipating future needs and specialist requirements.
Landscape	Protect and enhance the character and quality of the immediate and surrounding landscape.
Soils/ resources	Ensure the efficient and effective use of land, safeguarding key soil and mineral resources.
Transport	Promote sustainable transport use and active travel opportunities and reduce the need to travel.
Water	Use water resources in a sustainable manner and ensure sufficient sewerage network capacity ahead of development.

Part 1: What has plan-making / SA involved up to this stage?

4. Introduction to Part 1

4.1. Overview

4.1.1. Work to prepare the NPR has been underway since 2023, when an informal consultation was held on high level growth scenarios. This was then followed by formal consultation on the Pre-submission NPR and the Environmental Report in 2024 (July to October). However, the aim here is not to relay the entire backstory, nor to provide an ‘audit trail’ of steps taken. Rather, the aim is to report work undertaken to examine reasonable alternatives ahead of the current consultation. Specifically, the aim is to:

- explain the reasons for selecting the alternatives dealt with – see Section 5
- present an appraisal of the reasonable alternatives – see Section 6
- explain the Town Council’s reasons for selecting the preferred option – see Section 7

4.1.2. This is in accordance with the requirement for the Environmental Report to present an appraisal of reasonable alternatives and “an outline of the reasons for selecting the alternatives dealt with”.

4.2. Reasonable alternatives in relation to what?

4.2.1. The legal requirement is to examine reasonable alternatives (RAs) taking account of “the objectives and geographical scope of the plan”, which suggests a need to focus on the spatial strategy, i.e. providing for a supply of land, including via site allocations (NPPF para 69), to provide for development needs and wider plan objectives.¹ Establishing a spatial strategy is clearly a central objective of the NPR.

4.2.2. Spatial strategy alternatives can be described as “growth scenarios” and can also be described in summary as alternative key diagrams.

What about site options?

4.2.3. Whilst individual site options generate a high degree of interest, they are not necessarily RAs. Were a plan setting out to allocate one site, then site options would be RAs, but that is rarely the case. Rather, the objective is typically to allocate a package of sites to meet needs / objectives, hence RAs must be in the form of alternative packages of sites, in so far as possible. Nonetheless, consideration is naturally given to the merits of site options as part of the process of defining growth scenarios (Section 5).

Is the focus on housing sites?

4.2.4. Establishing a supply of land to meet housing needs (alongside infrastructure delivery, place-making etc) is invariably a key issue, and Buckingham is no exception; for example, the informal consultation on high level growth scenarios held in 2023 focused on the question of housing growth. However, there are significant choices in respect of employment land growth at Buckingham, recognising its strategic location (with Bicester, Oxford and the M40 corridor to the west; and with Milton Keynes and the M1 corridor to the east). As such, whilst the discussion below is somewhat housing-led, providing for needs and wider objectives relating to employment land is also a key factor influencing growth scenarios.

What about other aspects of the plan?

4.2.5. As well as establishing a spatial strategy, allocating sites etc, the NPR also sets out to establish policy on town-wide thematic issues (also policies for areas and individual sites) which, broadly speaking, can be described as development management (DM) policies. However, it is a challenge to define “reasonable” DM policy alternatives, and, in this case, none are identified.¹

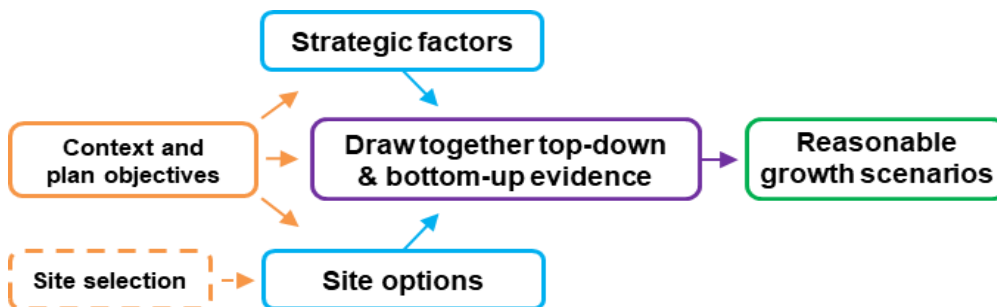
¹ Another consideration is a need to focus only on alternatives that are meaningfully different to the extent that they will vary in terms of ‘significant effects’ on the baseline, where significance is defined in the context of the plan. Alongside, it can be noted that ‘do nothing’ cannot be appraised as a reasonable alternative to ‘do something’ because ‘do nothing’ is the baseline.

5. Defining growth scenarios

5.1. Introduction

5.1.1. The aim here is to discuss the process that led to the definition of reasonable growth scenarios in late 2024 (subsequent to the pre-submission consultation).

Figure 5.1: A standard broad process to define reasonable growth scenarios



5.1.2. This process is described across the following sub-sections:

- **Section 5.2** – explores **strategic factors** with a bearing on growth scenarios.
- **Section 5.3** – considers individual **site options**, as the ‘building blocks’ of growth scenarios.
- **Section 5.4** – draws upon the preceding two sections to define **reasonable growth scenarios**.

5.1.3. With regards to the **context**, the first point to note is that work reported in the previous Environmental Report is a key input to the current process of defining growth scenarios.

5.1.4. A second point to make, regarding context to the process of defining growth scenarios, is that responses received through the Pre-submission NPR / Environmental Report consultation are a key input.

5.1.5. Thirdly, there is a need to acknowledge that numerous ‘non-SEA’ workstreams must feed-in, but there are invariably challenges in terms of timing. Also, the pragmatic reality is that non-SEA workstreams focus on the emerging preferred approach to some extent, but SEA must also explore alternatives.

A note on limitations

5.1.6. It is important to emphasise that this section does not aim to present an appraisal of reasonable alternatives. Rather, the aim is to describe the *process* that led to the definition of reasonable alternatives for appraisal. This amounts to a relatively early step in the plan-making process which, in turn, has a bearing on the extent of evidence-gathering and analysis that is proportionate, also recalling the legal requirement, which is to present an “**outline of the reasons for selecting alternatives...**”

5.2. Strategic factors

Introduction

5.2.1. The aim of this section of the report is to explore strategic factors (issues, options etc) with a bearing on the definition of reasonable growth scenarios. Specifically, this section of the report explores:

- Quantum – how much growth is needed (regardless of capacity to provide for it)?
- Broad spatial strategy – broadly where is more/less suited to growth, and what typologies are supported?

Quantum

5.2.2. As discussed in Section 2, Buckinghamshire Council has now provided a housing requirement figure of 1,100 homes over the period 2024 – 2040. Importantly, this is a quantum of homes to provide for over-and-above ‘existing supply’ from sites that have planning permission – see Figure 6.1 (noting that the permitted urban extensions to the north and to the south of the town are not yet under construction).

- 5.2.3. It is important for the NPR to make provision for this figure in full, in order to benefit from the provisions of NPPF paragraph 14, and in order to 'make provision' it could be appropriate to identify sites with a total capacity in excess of this figure, as a contingency for unforeseen delivery issues (a 'supply buffer').
- 5.2.4. The Town Council is supportive of this housing requirement as it: A) it aligns with the proposal from the Pre-submission NPR stage, which was to provide for 1,100 homes over the plan period, with this figure "derived from a combination of factors comprising the Housing Needs Assessment evidence and a view on past and future market absorption rates in the town"; and B) enables the NPR to allocate at least one strategic scale site, where a strategic scale site is one that is able to deliver a mix of uses and benefits to the local community that go beyond the provision of new homes, e.g. new community infrastructure.
- 5.2.5. There is also the possibility of the NPR providing for higher growth, e.g. if an opportunity presents itself to support a larger strategic site option that would deliver particular benefits. However, there is a need to exercise considerable caution in this regard, in that the effect must not be to prejudice the preparation of the Buckinghamshire Local Plan, as discussed. There is a clear acceptance that the Local Plan will be well placed to make a decision regarding broad growth strategy for Buckingham to perhaps 2045, or even 2050, in the light of objectively assessed housing needs for Buckinghamshire (likely understood from the Government's standard method), wider objectives (e.g. relating to strategic transport planning) and also an understanding of how Buckingham compares to other towns as a potential growth location.
- 5.2.6. This understanding around the 'reasonableness' of higher growth scenarios is a significant evolution from previous stages, when the view was that the NPR should remain open to high growth scenarios up to and including a scenario involving comprehensive growth to the south and west of the town in order to secure major new infrastructure including a new secondary school and a major new link road. Thinking at the time was that this could align with the objective of avoiding piecemeal growth with commensurate opportunities missed, and this does remain an important objective, but the situation has now evolved.
- 5.2.7. Finally, with regards to **employment**, Buckinghamshire Council has not provided a formal 'requirement' for the NPR, but there is a clear case for supporting new employment land over the plan period, both because there is evidence of demand / need and because supporting new employment land allows flexibility to consider select existing employment (industrial/commercial) sites within the settlement boundary to be redeveloped for housing.
- 5.2.8. At the Pre-submission NPR stage the proposal was to 'roll forward' an existing 10 ha employment allocation from the current ('made') Buckingham Neighbourhood Plan (2015), namely Site Q from that plan (see Figure 6.2), and Buckinghamshire Council responded:
- "The proposed new employment allocation is supported for site Q because it will help to replace the employment land which is lost as a result of the allocations under sites D, I, G and F. As part of this employment strategy for the Neighbourhood Plan it would be useful if further evidence on the deliverability of site Q was collected. For example, any ownership information, interest in specific types of employment, likely timescale of delivery, any constraints, etc."*
- 5.2.9. As such, there is a considerable degree of justification for this strategy. However, it is recognised that the site in question is the subject of a recently refused planning application for a 300 home residential-led scheme ([23/00178/AOP](#)) that is now the subject of an ongoing appeal.
- 5.2.10. The implication is a need to consider the option of supporting a residential led scheme on the site (see discussion below), but this could mean needing to support an overall low employment land growth strategy, as it is difficult to envisage an alternative means of delivering 10ha of employment land.

Figure 6.1: Existing committed sites (some of which are completed or under construction)

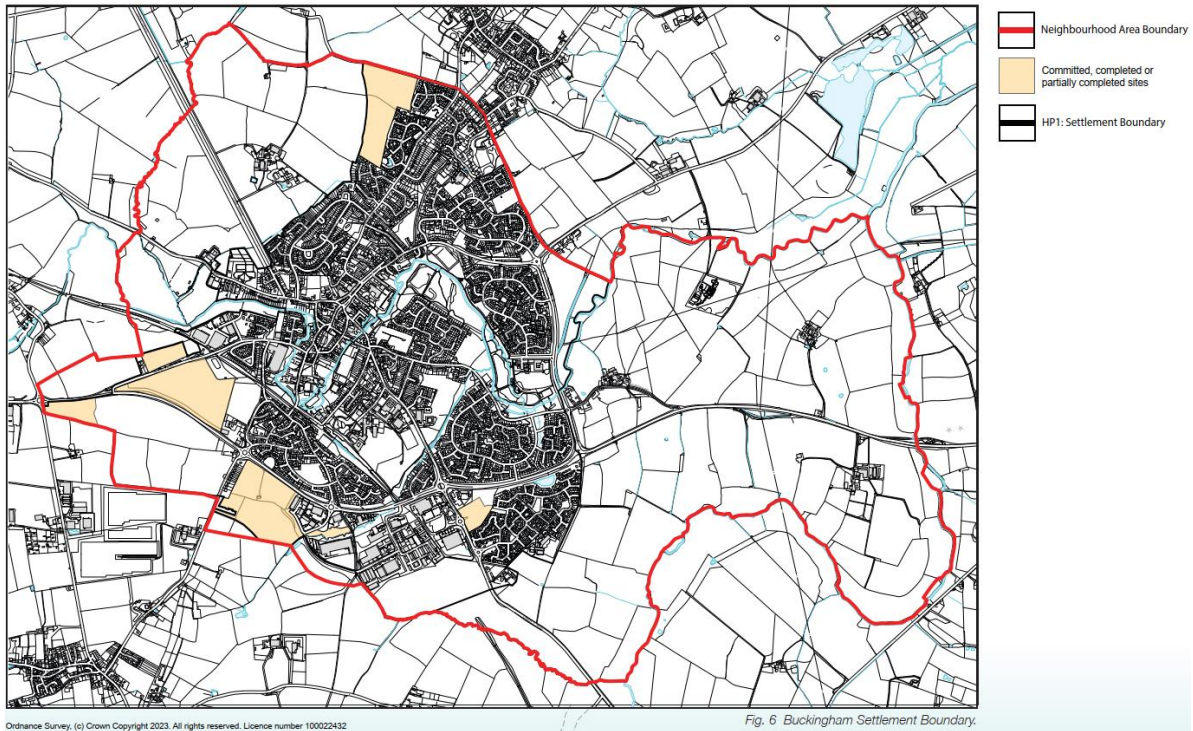
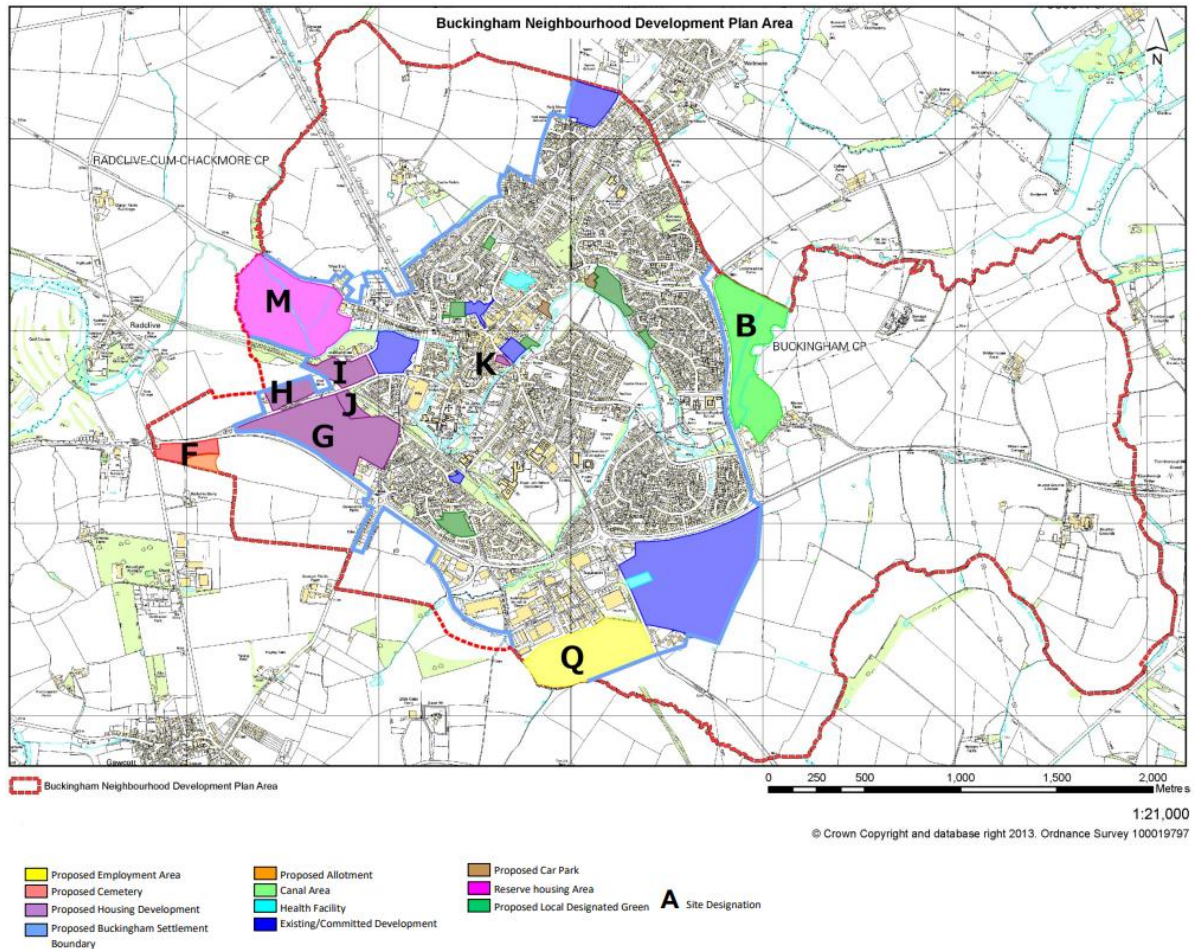


Figure 6.2: The key diagram from the made Neighbourhood Plan (2015) for context and to highlight Site Q.



Broad spatial strategy

- 5.2.11. Notwithstanding the discussion above regarding the scope to deliver growth through the NPR being somewhat limited (so as to avoiding prejudicing the emerging Buckinghamshire Local Plan), the first task here is to recap on work previously undertaken to explore **high level growth scenarios**.
- 5.2.12. The following high level growth scenarios were consulted on in late 2023 and then were also appraised within the Environmental Report published alongside the Pre-submission NPR in July 2024:
- Scenario 1: Western extension; this could bring forward up to 2,000 new homes.
 - Scenario 2: Southern extension; this could bring forward up to 3,250 new homes.
 - Scenario 3: Western and southern extension; this could bring forward up to 4,250 new homes.
- 5.2.13. The appraisal is no longer entirely policy-relevant, but it is nonetheless reproduced as Appendix II. A key message to come out of the appraisal is that there is a strong case for supporting comprehensive expansion across both the western and southern sectors of the town, namely Scenario 3, but this is not clear cut, because Scenario 3 is also associated with a range of issues/impacts and uncertainties, including around transport, historic environment, landscape and agricultural land objectives.
- 5.2.14. The other key points to take from this previous work are:
- There should be support for **strategic sites** rather than piecemeal expansion.
 - Options for strategic urban extension are primarily focused to the **west and south** of the town (aside from a discrete opportunity to support new housing in the Canal Area, to the east of the town).
- 5.2.15. Focusing on the second point, this is the case not least because of clear cut road connectivity and related town centre traffic issues, but also noting that there is a permitted site for 130 homes at the northern extent of the town (allowed on appeal in 2023; [20/00510/APP](#); shown on Figure 6.1). It can also be noted that the permitted site to the north will extend a site that delivered over recent years, and to the south of the town it is also possible to point to recently delivered and permitted sites that might be described as piecemeal expansion (see the first bullet point, above).
- 5.2.16. Finally, with regards to broad spatial strategy, there is a need to note that access to community infrastructure has emerged as a key issue/opportunity for the NPR, particularly in respect of ensuring easy **access to a local primary school** with capacity. Capacity is heavily concentrated in the east of the town (specifically, all bar a 1FE school in the town centre) whilst there is a concentration of recent, forthcoming and potentially forthcoming growth in the west and south of the town. Furthermore, the education authority has confirmed that there is a need to make provision for additional primary school places because existing primary schools are not able to expand. In turn, there is a clear growth-related issue/opportunity around delivering a new primary school in the southwestern part of the town.

5.3. Site options

- 5.3.1. Having given 'top down' consideration to strategic factors with a bearing on the definition of growth scenarios, the next step is to give 'bottom up' consideration to the site options that are available and in contention for allocation, and which can be thought of as the building blocks for growth scenarios.
- 5.3.2. Beginning **brownfield sites**, whilst not discussed above in Section 5.3, it goes without saying that there is a need to make best use of brownfield / previously developed land, in order to minimise pressure on greenfield land. There is a total of ten proposed brownfield allocations at the current time, with this list unchanged from the Pre-submission NPR. Taking these sites in turn:
- **Sites I, J and K** – are existing allocations within the made Neighbourhood Plan, which serves to suggest few concerns regarding suitability for development, although all are associated with certain issues of note, including flood risk in the case of Site K, and it is important to note that these sites are yet to come forward for development despite having been allocated for almost a decade.
 - **Site H** – is also an allocation in the made Neighbourhood Plan, although for mixed use development whilst the new proposal is for residential. It is a small site that currently comprising hardstanding, although it is located in the town centre conservation area and is clearly sensitive in heritage terms.
 - **Sites D, E, F and G** – are then notable for currently comprising industrial / commercial land.

Beginning with Sites D and F, these are small sites, and both are associated with residential areas. Site G is then larger, but again is surrounded by residential and is subject to few constraints.

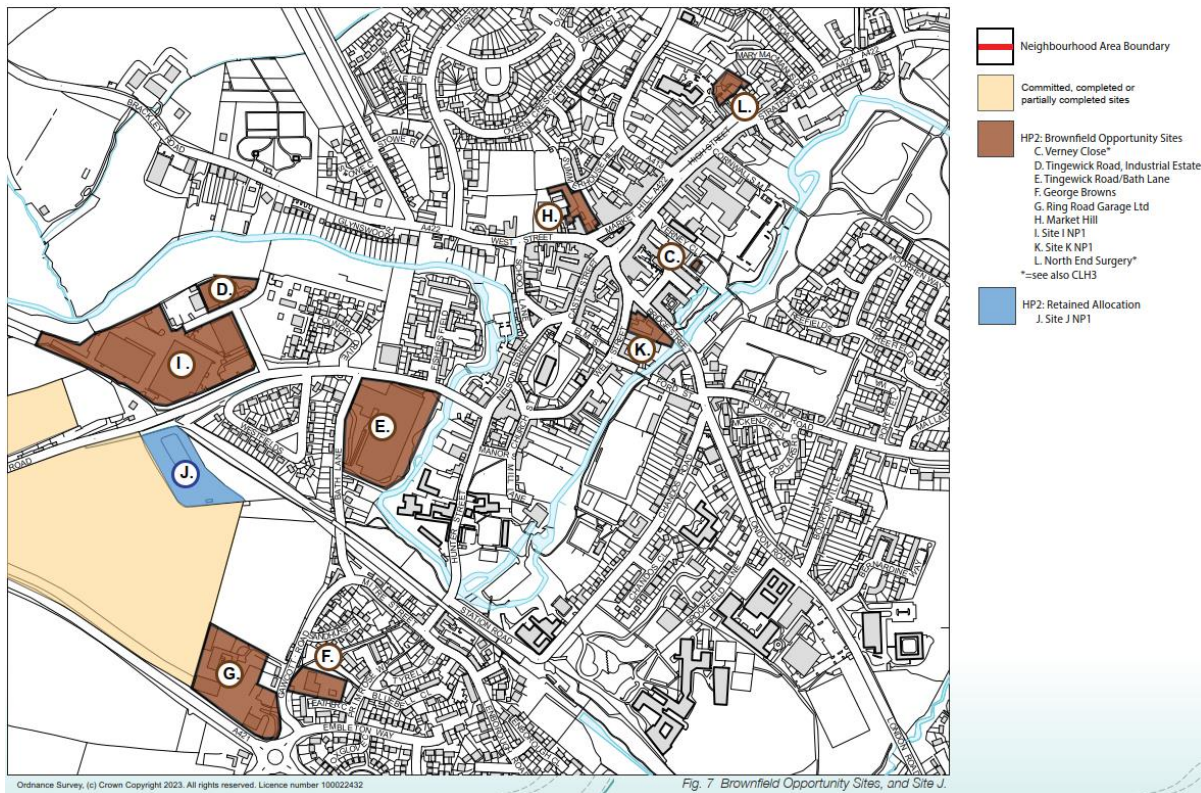
Site E is then a larger site and is subject to flood risk, although the site is vacant/derelict and this is a prominent location on the edge of the conservation area, plus development could likely achieve an offsite flood risk betterment. The site could potentially come forward for university accommodation.

- **Sites C and L** – are then the remaining two proposed brownfield allocations and are of note because they currently comprise GP surgeries, such that they will only be able to come forward for development if and when a new health centre is delivered at Lace Hill (Site O, discussed below). Both are small sites although both are located in the conservation area and Site C intersects the flood risk zone (the latest proposal for 10 flats is a reduction from 20 at the previous stage).

5.3.3. Ultimately, all of these emerging proposed brownfield allocations are considered to perform strongly, such that it is reasonable for them to be held constant across the reasonable growth scenarios, i.e. there is no reasonable need to formally explore scenarios involving reduced urban supply.

5.3.4. With regards to brownfield omission sites – i.e. sites that are not emerging proposed allocations but could be considered for additional allocation in order to boost brownfield supply – several are discussed in the Town Council’s background paper on ‘Brownfield Sites Schedule and overall Site Selection’, but all are not supported for quite clear cut reasons, such that they need not be considered further here.

Figure 6.3: The proposed brownfield allocations (unchanged from the pre-submission stage)



5.3.5. With regard to **greenfield sites**, a starting point is the two emerging proposed allocations for community uses, both of which are unchanged from the pre-submission stage, namely: **Site N**, which is proposed for a sixth form college; and **Site O**, which is proposed for a new health centre. Both comprise underused greenspace within the settlement boundary, although it is noted that Site N has wooded boundaries that could be suggestive of some biodiversity sensitivity. Ultimately, both sites are considered strongly justified, such that they can be progressed to the growth scenarios as a ‘constant’.

5.3.6. The next port of call is then **Site B**, which was a proposed allocation at the pre-submission stage, and remains strongly supported. There is a unique opportunity to deliver 90 homes in order to enable significant enhancements to the canal area, including a new visitor centre, such that this site can also reasonably be progressed to the growth scenarios as a constant. The need for enhancements is long established (see Figure 6.2) and Buckinghamshire Council commented through the recent consultation:

“Development in this area for housing would be contrary to the 2017 HELAA report site BUC014 which made the site unsuitable for either housing or employment. The assessment did support canal related development however. The proposed allocation is carefully conceptualised with all the key impacts subject to individual policy criteria. On flooding though, the site allocation should have full regard to the provision of Policy 14 in the VALP on flooding and drainage and require the planning application to model for climate change and demonstrate after modelling that safe access and egress can be achieved...”

5.3.7. All remaining site options are then being promoted for residential-led development, and a starting point is clearly **Site M**, which was proposed for 800 homes and other uses including land for a new primary school at the pre-submission stage. Allocation of this site aligns strongly with the ‘strategic factors’ discussed above, few concerns were raised through the pre-submission consultation and the merits of allocation were explored through work presented within the Environmental Report. Of particular note is the pre-submission consultation response received from Buckinghamshire Council, which did not raise any significant concerns, and most notably commented / raised questions as follows:

- *Has a masterplan been drawn up to test whether the proposed number of dwellings allocated will be possible?... Given the site area, this number of dwellings seems quite high and may result in a very dense form of development... [The site] would present an ideal opportunity for a local community centre giving considerations [including noting] last mile demands for delivery.”*

In answer, whilst a concept masterplan was shown in the Environmental Report at the pre-submission consultation stage, that has now been refined and is shown below as Figure 6.4. The latest concept masterplan includes land for both a primary school and a small local centre and, on density, a key point to note is that a design code will be in place to guide the development.

- *“It is important to demonstrate that there is a need for a primary school/educational facility on this site and that an extension of an existing school in Buckingham would not meet the demand...”*

There is confidence around there being limited if any opportunity to expand existing schools plus, and as discussed, there is a clear case for new capacity in this SW sector of the town.

5.3.8. Overall, there is strong justification for Site M at this stage in the plan-making process, such that it clearly warrants being progressed to the reasonable growth scenarios. The question is whether it should be progressed as a constant (as per brownfield sites discussed above, and the two greenfield sites proposed for community uses) or as a variable. This question is explored further in Section 5.4.

Figure 6.4: Concept masterplan for SW Buckingham (Site M)



- 5.3.9. The next sites to consider are then those that would extend the town to the south / southeast, namely **Sites Q, W and V**, all of which were actively promoted through the pre-submission consultation.
- 5.3.10. Beginning with Site W, an immediate issue is the scale of the site, with the site stretching between the A413 and A421 corridors at the SE edge of the town (the site would extend the recently delivered new community at Lace Hill). Any new growth in this sector would need to be comprehensive, such that the site would deliver comfortably in excess of 1,500 homes. This is beyond the scope of the NPR such that it is a matter for consideration through the Buckinghamshire Local Plan, as discussed. It is also noted that the consultation responses presents little in the way of positive discussion around the merits of the site and arguments for supporting comprehensive growth to the southeast of Buckingham.
- 5.3.11. Sites Q and V then require more close consideration because they are being promoted for 300 homes (plus 1.7 ha of employment land) and 220 homes respectively.
- 5.3.12. With regards to Site Q, this is the aforementioned existing 10 ha employment land allocation (i.e. it is an existing allocation in the made NP and the proposal at the Pre-submission NPR stage, earlier in 2024, was to role forward this employment land allocation). The principle of development here is already established, and the current planning application under appeal is noted, such that it is reasonable to explore the option of a 300 home mixed use scheme through the reasonable growth scenarios.
- 5.3.13. Finally, with regards to Site V, this site is located north of the A421 to the east of the town, such that it does not relate well to the existing settlement edge / built form of the town. It is also the case that there is a clear strategic argument for planning for this sector of land comprehensively along with adjacent Site W, including noting recent and ongoing work around potential upgrades to the A421 corridor west of Milton Keynes (in the context of a wider strategic case for improving connectivity between the M1 and M40 / A34 corridors). Furthermore, whilst it is noted that the proposal is to deliver “a new pre-school/nursery/community use”, and that the site would be located in proximity to existing primary schools, allocation of this site in place of Site M would represent an opportunity missed in respect of delivering a well-located new primary school. On balance this site is not taken forward to Section 5.4.
- 5.3.14. Concept masterplans for Site Q (taken forward) and Site V (not taken forward) are presented below.
- 5.3.15. The remaining site options listed in the Town Council’s background paper on ‘Brownfield Sites Schedule and overall Site Selection’ perform relatively poorly, and none were actively promoted through the pre-submission consultation. **Site T** is of note as it is an existing ‘reserve site’ (see Site M in Figure 6.2), but there are constraints to growth in this area (notably flood risk / the river corridor, transport connectivity and the landscape gap to Radclive) and, in turn, it seems unlikely that the site could deliver a primary school (recalling that primary school capacity in the west of the town is an issue). There remains a need to explore growth in this area, including potentially to deliver a new road link that could relieve pressure on the town centre, and it is for this reason that the possibility of growth here was explored through the consultation in late 2023 and through the assessment of high level growth scenarios within the Environmental Report earlier in 2024, but there is no potential for an NPR allocation.
- 5.3.16. The remaining sites of note are those sites (not already discussed) that were submitted through the recent Buckinghamshire Local Plan call for sites, which can be seen [here](#). One of these is a large site to the northeast of the town that falls within Maids Moreton Parish, and then the two other larger sites are located to the southwest of the town but clearly perform poorly relative to Sites M and Q. Both sites were considered as part of earlier work to explore high level growth scenarios.

5.4. Reasonable growth scenarios

- 5.4.1. The ten proposed brownfield allocations have a combined capacity of 364 homes plus there is also support for 90 homes at Site B (Canal Area). This results in a shortfall of 646 homes to the 1,100 homes housing requirement, and a clear option is to meet this shortfall through the allocation of Site M for 800 homes (plus a primary school and a local centre). The remaining question is then how to treat the option of a residential led scheme at Site Q, i.e. whether to explore its allocation in place of and/or in combination with Site M. On balance, there are three reasonable growth scenarios:
- Scenario 1 – constants plus Site Q = total supply of 754 homes
 - Scenario 2 – constants plus Site M = total supply of 1,254 homes
 - Scenario 3 – constants plus Site Q and Site M = total supply of 1,754 homes

Figure 6.5: Site Q (mixed use scheme) progressed to the growth scenarios



Figure 6.6: Site V not progressed to the growth scenarios



6. Growth scenarios assessment

6.1. Introduction

6.1.1. This section presents an assessment of the reasonable alternative growth scenarios introduced above.

6.2. Assessment findings

6.2.1. Within Table 6.1, each row (i.e. for each of the topics that comprise the SEA framework) the columns to the right hand side seek to: 1) rank the scenarios in order of preference where a rank of 1 indicates the preferable scenario (and with a gold star used as a visual aid), an equals sign (=) used where there scenarios cannot be differentiated with any confidence; and a question mark (?) used where there is insufficient evidence to make a judgement; and then 2) predict significant effects using RAG shading.²

Table 6.1: Growth scenarios assessment findings

Topic	Scenario 1 Constants + Site Q 754 homes	Scenario 2 Constants + Site M 1,254 homes	Scenario 3 Constants + Sites Q & M 1,754 homes
Accessibility (to community infrastructure)	2	1★	2
Air quality	=	=	=
Biodiversity	=	=	=
Climate change adaptation	=	=	=
Climate change mitigation	=	=	=
Communities and wellbeing	2	1★	3
Economy and employment	2	1★	2
Historic environment	1★	1★	2
Homes	3	2	1★
Landscape	1★	2	3
Soils/ resources	1★	2	=
Transport	1★	1★	2
Water	=	=	=

² Red indicates a significant negative effect; amber a negative effect of limited or uncertain significance; light green a positive effect of limited or uncertain significance; and green a significant positive effect. No colour indicates a neutral effect.

- 6.2.2. The most significant conclusions are reached under the ‘accessibility’ and ‘economy/employment’.
- 6.2.3. Beginning with ‘**accessibility**’, Scenario 2 (taking forward the strategy previously consulted upon at the pre-submission stage) would deliver on a clear strategy in respect of primary school provision (as discussed in Section 5.2) and would also deliver a well-located new local centre.
- 6.2.4. With regards to ‘**economy/employment**’, Scenario 1 would involve supporting just 1.7 ha of employment land at a site that is an existing allocation for 10 ha of employment, and there is not known to be any alternative site to ‘make good’ what would be a resulting shortfall of ~8 ha (albeit one or more sites could potentially be identified in the fullness of time, potentially through the Bucks Local Plan).
- 6.2.5. The need to support new employment land at Buckingham was considered in detail at the time of preparing the current (‘made’) Buckingham NP, and there is little reason to suggest that these arguments are reduced at the current time, e.g. recognising latest understanding around Buckingham’s strategic position located between growth areas of larger-than-local significance in virtually all directions. Buckingham is an important location for manufacturing and precision engineering, given links to both Silverstone and Milton Keynes. However, on the other hand, there is a need to deliver homes to support a skilled workforce that enables this nationally important employment cluster to thrive and grow.³
- 6.2.6. Site Q is well-located for employment given the adjacent thriving employment area, within which the Town Council understands there to be a demand from occupiers to find new, more suitable (e.g. larger) premises that could necessitate a move away from Buckingham without a new employment site. It is recognised that the site has not come forward for employment despite being allocated for almost a decade, but that is presumably in no small part because the land-owner wishes to bring the site forward for residential (as discussed). Having said this, it is recognised that an ‘Employment Land Statement’ (2022) was submitted through the pre-submission consultation that states a lack of market interest in employment land at the site, with the suggestion that potential occupiers would prefer to locate at Milton Keynes or Northampton, with the demand at Buckingham more for small scale industrial sites.
- 6.2.7. Finally, it is noted that rolling forward the employment allocation would form part of a wider strategy that includes support for residential-led redevelopment of existing employment sites within the town boundary. This is a factor of relevance to this current assessment, in that even if the NPR did not take this approach certain of the sites might come forward for residential in any case (as ‘windfall’).
- 6.2.8. The assessment also reaches conclusions of note under the following headings:
- Climate change adaptation – whilst the variable sites in question are not sensitive in flood risk terms, there is also a need to factor-in sites that are a ‘constant’ and, in this regard, a number are subject to flood risk (as discussed in Section 5.3), including Site B (Canal Area) and certain of the employment sites proposed for residential (recalling that employment land amounts to a less ‘vulnerable’ land use which likely factored-in to historic decisions to support employment land at these sites). However, the Environment Agency did not respond to the pre-submission consultation, and Buckinghamshire Council (the Lead Local Flood Authority) did not raise concerns (but encouraged further work, including to ensure a sequential approach is taken to site selection aimed at avoiding flood risk).
 - Communities and well-being – it is difficult to identify significant issues/opportunities over-and-above those discussed above under the ‘accessibility’ heading. However, on balance, it is appropriate to flag a concern around a new community at Site Q being located adjacent to, and separated from the wider town by, an existing industrial estate (with associated goods vehicle movements).
 - Historic environment – the variable sites are not subject to significant constraint (Historic England made no comment through the pre-submission consultation), but it is appropriate to flag a potential concern with higher growth given the high degree of sensitivity associated with the town centre. The historic environment is a key reason to proceed with caution around long term growth strategy.

³ It is recognised that Buckinghamshire Council has not provided the Town Council with an employment land requirement to be delivered through the NPR, but it is not common practice to do so other than through a Local Plan, and the Council “supported” continued allocation of Site Q for employment through the pre-submission consultation (albeit in the context of an assumed strategy involving support for residential-led redevelopment of several existing employment areas within the town boundary). Thame is of note as a town that shares some characteristics with Buckingham as a small town located in-between key growth areas / corridors within the Oxford to Cambridge Arc / Partnership area, and with thriving edge-of town employment areas. Here the local plan assigns an employment land requirement to the town council, which is set to be delivered through a neighbourhood plan that very recently (Nov 2024) received a recommendation to proceed to referendum from an independent examiner, who noted the importance of “*the balance between residential and commercial development in the town.*”

- Homes – both sites would be well-suited to delivering a good mix of new homes to include family housing and the full policy quota of affordable housing. Scenario 3 would involve a ‘supply buffer’ over-and-above the housing requirement that could be considered appropriate, given inherent delivery risks associated with the brownfield allocations, and it is difficult to conclude that falling short of the housing requirement under Scenario 1 gives rise to a significant concern.
- Landscape – on balance it is fair to support Scenario 1 given that Site Q would be developed under any scenario. However, this is uncertain, as development for employment (Scenario 2) would serve to define the edge of the town and minimise concerns around the town ‘sprawling’ downhill towards the Padbury Brook (and, in turn, assist with maintaining the town’s relationship with the Great Ouse). Also, Site M (Scenario 2) gives rise to limited landscape concerns noting relatively good potential for containment by a solar farm to the south and slightly rising land towards Gawcott.
- Soils / resources – focusing on agricultural land quality, whilst the nationally available dataset (which is low resolution/accuracy) suggests that this sector of the town’s edge is associated with ‘grade 3’ quality land, several parcels including Site M (Scenario 2) have been surveyed in detail (as understood from the data uploaded to magic.gov.uk; see the ‘post 1988’ dataset) and found to include significant land of grades 2 and 3a quality, i.e. land that is ‘best and most versatile’.
- Transport – the potential to deliver / support transformational new transport infrastructure upgrades – including aimed at relieving town centre traffic congestion and supporting modal shift away from the private car – was a focus of the previous work to explore high level growth scenarios (see Appendix II). There is a need to avoid foreclosing or hindering future consideration of options through the Local Plan, but it is difficult to conclude that either of the variable sites in question give rise to a particular concern in this regard. Attention potentially focuses on Site M (Scenario 2), but there is no reason to suggest that allocation of the site now would hinder any future consideration of options for a possible new A421 / A422 link road to the north. In this light, the assessment simply flags a potential concern with Scenario 3 as the higher growth scenario (albeit recognising that under Scenario 2 both sites would be developed, i.e. Site M for housing and Site Q for employment).
- Water – there is no evidence of particular concerns around wastewater treatment capacity, nor particular sensitivities around growth south of the town impacting the local water environment.

6.2.9. In **conclusion**, on the basis of the assessment it is immediately apparent that there is a strong case for supporting Scenario 2, which performs best or equal best under the most sustainability topic headings, and which is associated with the highest number of predicted positive effects (including on ‘significant’ positive) and equal fewest predicted negative effects. However, it is not the aim of this assessment to reach a conclusion on which of the scenarios is best performing overall, because the assessment is not undertaken with any assumptions made regarding the degree of importance / weight that should be assigned to each of the sustainability topics (nor are they assumed to have equal weight). It is for the town council, as the accountable decision-maker, to assign weight and in turn arrive at an overall conclusion on which of the scenarios to take forward into the NPR. Also, it is recognised that a number of the topic-specific assessment conclusions are finely balanced or otherwise open to debate.

7. The preferred approach

7.1.1. The following statement was provided by the town council’s consultants Oneill Homer in response to the assessment presented above (N.B. this statement does not amount to an assessment):

“**Scenario 2** is taken forward as the preferred scenario. This involves: allocation of Site M for 800 homes and other uses including a primary school and a local centre; allocation of eleven other smaller sites for residential-led development; and ongoing support for 10 ha of new employment land at Site Q.

The assessment lends clear support for this approach, with particular weight placed on the benefits of Scenario 2 relative to the two alternative scenarios under the ‘accessibility’ and ‘economy/employment’ headings. It is recognised that there is a ‘landscape’ argument for supporting Scenario 1, in that this might be seen as a strategy that minimises greenfield land take. However, taking a long term perspective it is not clear that this is the case because in the fullness of time – and potentially in the near future through the emerging Buckinghamshire Local Plan – Site M would likely come under pressure for development in any case (i.e. even if the NPR were to support Scenario 1) and there could well be a need to allocate significant new land for employment at Buckingham to make good the loss at Site Q.”

Part 2: SA findings at this stage?

8. Introduction to Part 2

- 8.1.1. The aim here is to present an assessment of the NPR as a whole, building upon the assessment of Growth Scenario 2 presented above.

Methodology

- 8.1.2. The assessment identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability topics and objectives identified through scoping as a methodological framework.
- 8.1.3. Every effort is made to predict effects accurately; however, this is inherently challenging given the strategic nature of the policies under consideration and understanding of the baseline (now and in the future under a 'no plan' scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g., in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim of striking a balance between comprehensiveness and conciseness). In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is possible to comment on merits (or otherwise) of the draft plan in more general terms.
- 8.1.4. Finally, it is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations. So, for example, account is taken of the probability, duration, frequency, and reversibility of effects. Cumulative effects are also considered, i.e., the potential for the NPR to impact an aspect of the baseline when implemented alongside other plans, programmes, and projects. These effect 'characteristics' are described within the assessment as appropriate.

9. Appraisal of the Buckingham NPR

- 9.1.1. The appraisal is set out below under the SA framework (Section 3).

9.2. Accessibility (to community infrastructure)

- 9.2.1. The appraisal in Section 6 focuses on the merits of the NPR strategy in respect of primary school provision, with the issue / opportunity in this regard having been introduced in Section 5.2. This is the primary benefit of the NPR; however, there is also support for the proposed strategy in respect of healthcare facilities. Specifically, the proposal is to support the redevelopment of two existing GP surgeries for residential and to allocate a site for a single larger healthcare facility at Lace Hill. Furthermore, the NPR allocates a site for new / expanded secondary school or six form provision.
- 9.2.2. With regards to site-specific policy, a key point to note is that the policy for the main proposed allocation (Policy HP3 Land to the South West of Buckingham) is mostly unchanged from the per-submission consultation stage, which generates confidence regarding agreement between all parties in respect of what the site will deliver. A number of the other area-wide / thematic policies are also supported in terms of 'accessibility' objectives (and none give rise to a significant tension) including Policies CLH1 (Active and sustainable travel), CLH3 (Health facilities), CLH4 (Art, cultural, sport, and recreation facilities) and EE1 (Buckingham Town Centre).
- 9.2.3. In **conclusion**, as per the conclusion in Section 6 in respect of Growth Scenario 2, it is appropriate to predict a **significant positive effect** for the NPR as a whole.

9.3. Air quality

- 9.3.1. Air quality is not a significant issue locally, such that the appraisal in Section 6 does not flag a concern even under the higher growth scenario. However, traffic through the town centre is an issue, and there are implications for the quality of the local environment, and potentially air pollution.
- 9.3.2. Traffic through the town centre is a key reason why there is a desire to ensure a comprehensive approach to growth that delivers transport infrastructure upgrades and, in this regard, the proposed NPR growth strategy is judged to perform well (as discussed in Part 1). Also, aside from town centre traffic issues, the strategy should help to maximise the ability to walk to a primary school and is also supported in terms of avoiding / minimising the movement of HGVs / good vehicles through residential areas.

- 9.3.3. With regards to site-specific policy, a key point to note is that the policy for the main proposed allocation (Policy HP3 Land to the South West of Buckingham) specifies key issues/opportunities that should be a focus of a Transport Strategy submitted as part of a forthcoming planning application, notably including: *“Proposals for the improvement of existing bus services to serve the proposals and connecting to the town centre, community facilities and employment areas in the town.”* A number of the other area-wide / thematic policies are also supported in terms of transport and, in turn, air quality objectives, most notably Policy CLH1 (Active and sustainable travel), which defines a network that, in turn, can and will be a focus of future work as part of planning applications, including work to target developer contributions.
- 9.3.4. In **conclusion**, whilst transport objectives are a key consideration for the NPR there is little to suggest that the NPR gives rise to any significant implications for air quality, hence a **neutral effect** is predicted.

9.4. Biodiversity

- 9.4.1. The assessment of reasonable alternative growth scenarios in Section 6 does not include a focus on biodiversity because the main proposed 800 home allocation is subject to limited constraint, but there is support for the site in that it aligns with the objective of ensuring a long-term / comprehensive approach to any future strategic expansion west and/or south of the town (as discussed in Section 5). There are some biodiversity sensitivities in this wider sector of land, most notably relating to the river corridors.
- 9.4.2. With regards to sites that are a 'constant' across the scenarios assessed in Section 6, the key site of note is Site B (Canal Area), which is allocated through Policy CLH2 (Development of the Canal Area). There is no priority habitat in this area, but there is a clear opportunity for well-targeted habitat creation/enhancement given the adjacent river corridor. Amongst other things, the policy requires: *“... waterbodies (such as ponds, scrapes, ditches and rain gardens) on site to create new habitats as part of a natural flood management strategy.”*
- 9.4.3. Returning to the main proposed allocation, proposed requirements are fairly generic, including: *“... Include proposals for habitat enhancements integrated within and through the site having regard to the Neighbourhood Plan desk based ecological assessment and subsequent ecological surveys to be undertaken in developing planning application proposals. Habitats to be considered as part of such proposals include semi-improved grassland/other neutral grassland, wetland, scrub and orchard.”* It might be suggested that this site would ideally be planned for comprehensively with land to the north (associated with the river corridor) in order to ensure that green / blue infrastructure issues and opportunities are addressed in a comprehensive fashion, but there is no clear basis for this suggestion.
- 9.4.4. With regards to the remaining proposed allocations, there is inherently limited concern in respect of the brownfield sites, although several do have a degree of biodiversity sensitivity (onsite or adjacent habitat), perhaps most notably Sites I, D and E, which comprise current or former industrial land closely associated with the River Great Ouse corridor. Whilst the sites are not assigned site-specific policies, overarching Policies ENV2 (Green and blue infrastructure) and ENV3 (Urban greening) would apply.
- 9.4.5. In **conclusion**, having taken into account site-specific and area-wide / thematic policy, noting that Natural England did not have any specific comments to make through the pre-submission consultation, and recalling that the baseline situation is one whereby the town likely continues to come under pressure for development, it is appropriate to predict a **moderate or uncertain positive effect**.

9.5. Climate change adaptation

- 9.5.1. As discussed in Section 5 and within Section 6, flood risk is a constraint for a number of the proposed allocations, most notably Site E, which is a vacant and derelict former industrial site. The other site of primary note is potentially Site B (Canal Area), but here there is good potential to avoid and buffer the flood risk zone through careful consideration of the developable area within the site boundary.
- 9.5.2. Focusing on Site E, there will be good potential to avoid and mitigate flood risk through development management, albeit potentially with implications for site capacity and with viability implications. Also, a benefit of development is the likely potential to achieve a betterment in respect of downstream flood risk affecting numerous properties, given the extent of hardstanding currently onsite. Also, there is a need to account for the need to bring this site back into good use given its prominent town centre edge location. Finally, concerns are allayed on account of Policy I1 (Water management and flood risk), under which there is a clear requirement for a site-specific Flood Risk Assessment.

- 9.5.3. In **conclusion**, it is appropriate to predict a **moderate or uncertain negative effect**, particularly given the flood risk constraint affecting Site E, albeit recognising that the site could potentially come forward for development in the absence of the NPR. It is noted that the Environment Agency did not respond to the pre-submission consultation whilst Bucks Council emphasised the need to take a sequential approach in respect of site selection aimed at avoiding development sites affected by flood risk.

9.6. Climate change mitigation

- 9.6.1. Focusing on built environment decarbonisation (given that transport emissions can be considered below under the 'transport' heading), there is support for directing growth to a large strategic site that should have good viability credentials (given economies of scale and a fairly unconstrained site not likely to be associated with abnormal development costs, e.g. with good existing road access). Specifically, this is because the site should be well placed to deliver net zero development to an exacting standard (i.e. in line with the energy hierarchy, ideally to include not having to resort to offsetting, i.e. 'onsite' net zero) or otherwise to achieve energy/carbon standards that go beyond the requirements of Building Regulations.

- 9.6.2. In this regard, Policy DH4 (Addressing The Performance Gap) is supported, although there is the potential to go further by specifically requiring net zero development (at least for the aforementioned large strategic allocation) as opposed to 'zero carbon ready' development, i.e. development that will be zero carbon (in terms of operational emissions) once the national grid is fully decarbonised. Looking beyond operational emissions (i.e. emissions associated with the day-to-day use of the building), it is noted that there is also quite a stringent requirement as follows:

"Proposals for major development should be accompanied by a Whole Life-Cycle Carbon Emission Assessment, using a recognised methodology, to demonstrate actions taken to reduce embodied carbon resulting from the construction and use of the building over its entire life."

- 9.6.3. In **conclusion**, the NPR is supportive of built environment decarbonisation objectives, but there is a 'high bar' to predicting positive effects of any significance, given the urgency of the issue / stretching nature of targets and the context of numerous local and neighbourhood plans nationally requiring net zero development. As such an overall **neutral effect** is predicted.

9.7. Communities and wellbeing

- 9.7.1. In respect of the spatial strategy / proposed package of site allocations there are few issues to explore over-and-above those already considered above. With regards to the proposed focus of new homes to the southwest of the town, a key issue is addressing the severance effect of the A421, and it can be suggested that the existing committed and currently proposed growth locations in this southwest sector of the town would ideally be delivering on a clearer strategy in this regard. The Environmental Report from the pre-submission stage recommended: *"Policy HP3 does identify that a highways scheme for the site must comprise measures to encourage and enable safe walking and cycling to the town centre, but it is recommended that the need for safe walking, cycling, and wheeling crossings at the A421 is made more explicit."* One other consideration is then the village of Gawcott, to the south west of Buckingham, where there is a need to ensure strategic consideration is given to the relationship with and links to Buckingham; however, no major issues or opportunities are immediately evident.
- 9.7.2. Focusing on employment land, there is generally support for a strategy of concentrating industrial land at the southern extent of the town, at a location well connected to the strategic road network, and redeveloping sites within the town boundary that are closely associated with existing or committed residential areas. Also, and as discussed, from a 'communities' perspective there is strong support for redeveloping Site E, which is a derelict employment site in a prominent and more widely important location at the edge of the town centre, and where there would appear to be a green / blue infrastructure opportunity (to include Sustainable Drainage Systems to reduce surface water run-off rates and potentially even accommodate some flood water storage / attenuation, although this is unclear).
- 9.7.3. With regards to area-wide / thematic policy, there is clear support for the plan section dedicated to health and wellbeing, as well as policy measures to improve sustainable transport access and active travel opportunities (Policy CLH1), expand cultural and recreational facilities in the town (Policy CLH4), improve healthcare provisions (Policy CLH3) and improve green infrastructure and walking routes in the canal area (Policy CLH2).

- 9.7.4. There is also support for environmental policies which seek to improve access to nature for residents. This includes the policies measures which ensure private outdoor space and higher levels of urban greening in new development (Policies ENV3 and ENV4), reinforce a green and blue infrastructure network throughout the town (Policy ENV2) – including by introducing a Green Ring around the town (Policy ENV1), and by supporting access to a range of designated Local Green Spaces (Policy ENV5).
- 9.7.5. In **conclusion**, having taken into account site-specific and area-wide / thematic policy, and noting adjustments that have been made to the plan following the pre-submission consultation, it is appropriate to predict a **'moderate or uncertain' positive effect** on the baseline. However, there is an outstanding recommendation around ensuring that steps are taken, with a long term perspective, aimed at ensuring that housing growth south of Buckingham is well-connected to the north notwithstanding the A421.

9.8. Economy and employment

- 9.8.1. There is strong support for the proposed strategy, as discussed in Section 6. Specifically, the proposal is to support redevelopment of several employment sites within the town boundary but to ensure that there is a significant net increase in employment land locally by continuing to support 10 ha of new employment land to the south of the town at existing allocation Site Q. The existing employment sites for redevelopment are mainly clustered to the west of the town, and whilst they were previously at the edge of the town they are now closely associated with existing or committed residential areas. The other key consideration is then ensuring that employment land is well-connected to the A421.
- 9.8.2. The other key policy is then Policy EE1 (Buckingham Town Centre), which sets out a strategy to inform future planning applications informed by a Town Centre Study. This includes defining a town centre boundary and primary/secondary frontages within that. Supporting text sets out key context around the fact that nearly three-quarters (71%) of town centre premises are now occupied by businesses within use Class E, and goes on to explain:

“It is recognised that some changes of use do not now require planning permission and new permitted development rights has enabled future changes of use from what are now Class E uses to residential (C3) uses. The Town Council hopes that Buckinghamshire Council will consider requesting an Article 4 Direction from the Secretary of State to protect Class E uses at Primary Shopping Frontages premises. An Article 4 Direction can remove permitted development rights in areas or from specific premises to enable changes to remain in planning control so that their effect can continue to be properly assessed. This is noted here so that the Town Council can signal its intent to the community to submit a formal request for this following the referendum of the plan.

In the meantime, proposals for a change of use from Class E to residential use made a premises with a Primary Shopping Frontage will still require the submission of an application titled ‘Prior Approval’ to Buckinghamshire Council. Buckinghamshire Council is required to consider the impact of that change of use on the character or sustainability of the Buckingham Conservation Area amongst other matters by way of Class MA.2.(e)(ii) of the 2015 General Permitted Development Order).

... Although the Neighbourhood Plan policy is not engaged in that prior approval determination... together with the Buckingham Conservation Area Review from 2005 the policy demonstrates that commercial, business and service uses play an important part of the distinct function and character of the Conservation Area and protecting the Primary and Secondary Shopping Frontages from such changes is important. The policy and its evidence base therefore informs decisions on prior approval applications for proposals that will harm the character or sustainability of the Conservation Area. This is noted here to draw attention to this evidence base.

It is now widely accepted that high streets need to diversify to become more community focussed in their use and to do so requires planning for a mix of different uses. Whilst the main focus for the established Primary Shopping Frontage is focussed on Class E uses, the wider Secondary Shopping Frontages provides an opportunity to focus on other town centre uses which not only includes retail, but also leisure, tourism, cultural and community as identified by VALP Policy D7. The policy therefore encourages other town centre uses in the Town Centre within the Secondary Shopping Frontage.

It is also now widely accepted that residential uses (Class C3) in Town Centres contribute to maintaining and/or enhancing its vitality and viability. The policy therefore also makes provision for Class C3 uses on upper floors ensuring that active frontages remain at ground floor level and access schemes do not harm frontages.”

- 9.8.3. In **conclusion**, the employment land and town centre strategies are both strongly supported. There is a case for a predicting significant positive effect, but a **'moderate or uncertain' positive effect** is predicted on balance, recognising that it will be important to plan for employment land at Buckingham in the context of a wider strategy through the Buckinghamshire Local Plan.

9.9. Historic environment

- 9.9.1. This is a key consideration locally, given the value and sensitivity of the town centre, Stowe School/Park to the north of the town, surrounding historic villages (Maids Moreton, Radclive, Gawcott) and also a landscape setting within a historic farmed landscape cut through by river / stream corridors. In this light, the assessment of reasonable alternative growth scenarios presented in Section 6 is supportive of the proposed growth strategy, and perhaps most notably because it retains flexibility to consider the future growth of Buckingham through the Buckinghamshire Local Plan in a way that ensures flexibility to plan for the town's transport infrastructure (noting problematic town centre traffic) and landscape setting.
- 9.9.2. A further consideration is the relationship between the proposed spatial strategy / allocations and the proposed approach to designating Local Green Spaces and, in this regard, attention focuses on the proposed new LGS designation at St. Rumbold's Field, which is associated with a valued scheduled monument, and where the land takes on considerable green infrastructure importance given existing, committed and proposed surrounding residential areas.⁴ There is also an adjacent commercial area that is proposed to be redeveloped for residential through the plan (Site G), which is supported in this regard. Furthermore, Site J is a greenfield site adjacent to St Rumbold's Well, however, this site is a rolled over allocation from the made plan, that has previously been found sound as an allocation site.
- 9.9.3. Maintaining a focus on the proposed brownfield allocations, it is also important to note that three are located within the Buckingham Conservation Area (Sites C, H, and K), and another two lie adjacent to it (Sites A and E). Furthermore, two sites (Sites A and K) contain non-designated heritage assets. However, in all cases there are few concerns given existing land uses and noting that development will come forward in line with the Buckingham Design Code (Policy DH1).
- 9.9.4. Furthermore, Policy DH2 aims to protect the significance of a list of local (non-designated) heritage assets, and the approach of incrementally adjusting (generally expanding) the local heritage list over time is considered to represent good practice, including from a perspective of seeking to engage local residents / communities in the town's heritage. In this regard, an aim might be to develop an interactive web-map that allows users to explore the spatial relationship between the various local planning policy designations including heritage designations, green / blue infrastructure and movement corridors.
- 9.9.5. In conclusion, having taken into account site-specific and area-wide / thematic policy, and noting that Historic England made no specific comments through the pre-submission consultation, it is appropriate to predict a **'moderate or uncertain' positive effect** on the baseline (also recalling that the baseline situation is one whereby the town will likely continue to come under development pressure).

9.10. Homes

- 9.10.1. The proposed strategy is proactive in that the identified supply (1,254 homes) comfortably exceeds the identified housing requirement (1,100 homes). However, it is important to be clear that a 'supply buffer' on this scale, or potentially of a greater scale, is likely a necessity given that a number of the proposed brownfield allocations are associated with clear delivery risks, in that development could be delayed (or feasibly not happen at all in the plan period) and/or it could transpire that the sites do not deliver to the anticipated capacity, e.g. to account for onsite constraints (including flood risk) and design objectives.
- 9.10.2. In this light, it is recommended that consideration is given to amending Policy H1 to be clear that the identified supply (1,254 homes) is sufficient to generate confidence that the housing requirement (1,100 homes) will be delivered in the plan period. This will assist Buckinghamshire Council in respect of work to demonstrate a housing land supply (recognising that a failure to do so has implications for Buckinghamshire as a whole, i.e. not just Buckingham). Equally, there is a need to ensure clarity and conservative assumptions around when each of the allocations will deliver (Appendix A of the plan).

⁴ St Rumbold's Well is a designated scheduled monument (holy well) that is the last visible feature of the cult of the saint. The structural remains of the early 17th century conduit house are of considerable significance, which has been a historic place of pilgrimage. The spatial relationship between the cultivation pattern (ridge and furrow) and the site of St Rumbold's Well is also of importance and development in the countryside surrounding it will likely need to consider potential archaeological impacts.

- 9.10.3. For example, in respect of the two proposed brownfield allocations where delivery is reliant on a new healthcare centre being delivered at Lace Hill, the plan document explains:

“The delivery of the Lace Hill healthcare facility project has suffered a number of setbacks. Whilst the site did secure planning permission, funding could not initially be realised. The scheme therefore had to be revised to suit funding parameters delaying the completion date. In the meantime land ownership changed and whilst all relevant parties are currently working in partnership to deliver the scheme, there is a need to add additional flexibility to the site should an alternative project be pursued. Given that the plan period runs until 2040 this kind of flexibility is common for projects such as these...”

- 9.10.4. Aside from Policy H1 / matters around growth quantum, the NPR is also supported in wider respects (in terms of this ‘homes’ topic). Notably, Policy HP5 aims to ensure a suitable mix of housing types, sizes and tenures, and there is a good degree of confidence around the effect not being to affect development viability – alongside wider policy requirements – to the extent that sites struggle to deliver.
- 9.10.5. In **conclusion**, it is appropriate to predict a **‘moderate or uncertain’ positive effect**, as per the conclusion reached for Scenario 2 in Section 6, but there is scope for further work to ensure clarity around delivery certainty and anticipated timescales, accounting for known delivery issues and potentially also viability factors in light of proposed policy requirements.

9.11. Landscape

- 9.11.1. Focusing on expansion of the town to the south, there is support for the proposed growth strategy / allocations, as discussed in Section 6. This is because: A) the proposed (rolled forward) employment allocation should serve to define the edge of the town and minimise concerns around the town ‘sprawling’ downhill towards the Padbury Brook (and, in turn, assist with maintaining the towns relationship with the Great Ouse); and B) the main proposed residential allocation gives rise to limited landscape concerns noting relatively good potential for containment by a solar farm to the south and slightly rising land towards Gawcott. However, and as previously explored through the appraisal of high level growth scenarios (Appendix II of this report), there is a clear landscape case for planning for the expansion of Buckingham to the west and/or to the south in a comprehensive fashion and with a long term perspective. The proposed strategy generates few concerns around prejudicing the ability to do so (foreclosing options etc), as discussed in Section 5, but could nonetheless still be suggested that there is a case for avoiding further decisions on town expansion ahead of the Local Plan.
- 9.11.2. The other key consideration is the proposed 90 home allocation in the Canal Area, building upon policy set out in the Made Neighbourhood Plan; however, Policy CLH2 requires sensitive development that responds to the Local Landscape Area designation (in the east of the town). Notably, proposals are expected to submit a green infrastructure strategy, minimise loss of existing mature trees and hedgerows, meet an Urban Greening Factor, introduce new permanent or ephemeral waterbodies, and include a landscape buffer along the River Great Ouse. There is also the strategic context of the canal / river / Bernwood Jubilee Way corridor linking to Milton Keynes to the east, albeit at a distance of ~10km.
- 9.11.3. Finally, numerous aspects of site-specific and area-wide / thematic policy are supported from a landscape perspective (and no significant tensions can be identified). Notably, there is support for: efforts to enhance and extend an identified green and blue infrastructure network (Policy ENV2), including through the introduction of a ‘Green Ring’ around Buckingham (Policy ENV1); the designation of Local Green Spaces (Policy ENV5); and the proposed policy on urban greening (Policy ENV3).
- 9.11.4. In conclusion, there is support for the strategy on balance, including because of its proactive approach to supporting brownfield development. However, there remain issues and uncertainties in respect of how to plan for the growth of Buckingham in a way that respects its position as a historic town within a sensitive landscape and in proximity to national growth areas. An overall **neutral effect** is predicted.

9.12. Soils/ resources

- 9.12.1. The key consideration here is avoiding the loss of best and most versatile (BMV) agricultural land and, in this regard, the main proposed residential allocation is constrained, as is the smaller proposed allocation in the Canal Area (and this is known because the landowners have undertaken detailed survey work, which is helpful). However, there is a need to recall that the baseline situation is one whereby the town would likely continue to come under pressure for expansion, and it is only land to the west of the town where agricultural land quality is notably lower (and there are wider constraints to growth in this area).

- 9.12.2. Aside from agricultural land quality another consideration can be around avoiding sterilisation of minerals resources that might otherwise be viably extracted, noting the minerals safeguarding areas presented at [Map 4](#) within the Buckinghamshire Minerals and Waste Local Plan (2019). However, safeguarding is not absolute, and Buckinghamshire Council did not raise concerns through consultation.
- 9.12.3. In conclusion, there is a clear need to predict a negative effect given loss of BMV agricultural land, but this is of limited significance given the likely baseline situation, and also recalling that the NPR proposes an ambitious strategy in respect of maximising housing supply from brownfield sites. The overall prediction is a **'moderate or uncertain' negative effect**.

9.13. Transport

- 9.13.1. The potential to deliver / support transformational new transport infrastructure upgrades – including aimed at relieving town centre traffic congestion and supporting modal shift away from the private car – was a focus of the previous work to explore high level growth scenarios (see Appendix II). There is a need to avoid foreclosing or hindering future consideration of options through the Local Plan, and the proposed strategy is overall supported in this regard, but there does remain some residual uncertainty.
- 9.13.2. Focusing on site-specifics and site-specific policy, discussion above has already explored the challenge created by A421 severance in respect of expansion of the town to the south, and the possibility of additional site-specific requirements around addressing this issue can be envisaged (albeit with cost and, in turn, development viability implications). Having said this, it is important to recall a key benefit of the site namely that it will deliver a new primary school that will be accessible not only to residents within the site itself but also surrounding communities in the southwest sector of the town, who would otherwise have to travel to existing schools in the east of the town. Also, the site will deliver a new local centre (which would ideally be collocated with the primary school in support of linked trips), which and Buckinghamshire Council have stated their support for a last mile delivery facility.
- 9.13.3. Numerous wider aspects of the NPR are also supported from a 'transport' perspective (and no significant tensions can be identified); including the proposed brownfield allocations (perhaps most notably Site E, as a larger site on the edge of the town centre, albeit subject to flood risk). With regards to area-wide / thematic policies, Policy CLH1 (Active and sustainable travel) is strongly supported, particularly as it defines a network that, in turn, can and will be a focus of future work as part of planning applications, including work to target developer contributions.
- 9.13.4. In conclusion, having taken into account site-specific and area-wide / thematic policy, and noting adjustments made subsequent to the pre-submission consultation, it is appropriate to predict a **'moderate or uncertain' positive effect** on the baseline. However, there remain issues and uncertainties, and it will be important to maintain a 'watching brief' in light of the emerging Buckinghamshire Local Plan associated evidence base work, including around A421 strategy.

9.14. Water

- 9.14.1. There is no evidence of particular concerns around wastewater treatment capacity, nor particular sensitivities around growth south of the town impacting the local water environment. The other key point to note is that Policy I1 (Water Management and Flood Risk) has been strengthened subsequent to the pre-submission consultation, to reflect the consultation response received from Buckinghamshire Council, in that requirement is now that developments achieve a water efficiency standard of 100 litres per person per day. This is clearly supported from a 'water' perspective, but there is a need to consider that all such policy requirements have costs and, in turn, cumulative implications for development viability that could create delivery risk / increase delivery uncertainties, notably for brownfield sites that are more costly to develop and may have existing use value. An overall **neutral effect** is predicted.

9.15. Summary

- 9.15.1. The assessment predicts positive effects under the majority of headings, but there are some inherent tensions with climate change adaptation (flood risk) and agricultural land objectives. As per the discussion in Section 6, the most significant benefits of the NPR are around proactively planning for new homes (although a recommendation is made around ensuring clarity around the distinction between potential supply and committed supply), transport objectives (although there is a need to maintain a watching brief, and there are ongoing challenges around A421 severance) and employment objectives.

Part 3: Next steps

10. Plan finalisation

- 10.1.1. This Environmental Report is submitted and published alongside the NPR under Regulations 15 and 16 of the Neighbourhood Planning Regulations.
- 10.1.2. It will be for an Independent Examiner to consider consultation responses received as part of an examination process focused on testing whether the Neighbourhood Plan meets the Basic Conditions for Neighbourhood Plans and confirming that it is in general conformity with the Local Plan.
- 10.1.3. If the examination is favourable, the NPR will be subject to a referendum. If more than 50% of those who vote agree with the plan, then it will be 'made' part of the Development Plan for Buckinghamshire.

11. Monitoring

- 11.1.1. The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report.
- 11.1.2. It is anticipated that monitoring of effects of the Neighbourhood Plan will be undertaken by Buckinghamshire Council. The SEA has not identified any potential for significant negative effects that would require closer monitoring, led by the Town Council. However, there is a clear case for monitoring employment land supply in Buckingham to inform ongoing discussions around need/demand for employment land in the town versus at nearby strategic employment locations.

Appendices

Appendix I: Legal checklist

Schedule 2 of the Environmental Assessment of Plans Regulations 2004 (the Regulations) explains the information that must be contained in the Environmental Report; however, interpretation of Schedule 2 is not straightforward. Table AI.1 links the structure of this report to an interpretation of Schedule 2 requirements, whilst Table AI.2 explains this interpretation. Table AI.3 identifies how and where within this report the requirements have/ will be met.

Table AI.1: Questions answered by this report, in-line with an interpretation of regulatory requirements

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

Table AI.2: Interpretation of the regulations

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

Table AI.3: 'Checklist' of how (through the process) / where (in this report) regulatory requirements are met

Regulatory requirement	How requirement is met
A) The Environmental Report must present certain information	
1. An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Chapter 2 ('What is the plan seeking to achieve') presents this information.
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters have been considered in detail through scoping work, which has involved dedicated consultation on a Scoping Report, which is available on the Town Council's website. The 'SEA framework' – the outcome of scoping – is presented within Chapter 3 ('What is the scope of the SEA?').
3. The environmental characteristics of areas likely to be significantly affected;	
4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance...;	
5. The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	
6. The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	Chapter 6 presents alternatives assessment findings (in relation to housing and employment growth, which is a 'stand-out' plan policy area). Chapter 9 presents an assessment of the draft plan. With regards to assessment methodology, Chapter 8 explains the role of the SEA framework/scope, and the need to consider the potential for various effect characteristics/ dimensions, e.g. timescale.
7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment...;	The assessment highlights certain tensions with environmental and wider sustainability objectives, which might potentially be actioned.
8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Chapters 4 and 5 deal with 'Reasons for selecting the alternatives dealt with', in that there is an explanation of the reasons for focusing on particular issues and options ('scenarios'). Also, Chapter 7 gives reasons for selecting the preferred option.
9. Description of measures envisaged concerning monitoring in accordance with Art. 10;	Chapter 11 presents measures envisaged concerning monitoring.
10. A non-technical summary of the information provided under the above headings	See start of this report
B) The Report must be published for consultation alongside the draft plan	
Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the Draft Plan or programme and the accompanying environmental report before the adoption of the plan (Art. 6.1, 6.2)	At the current time, this report is published for consultation alongside the draft plan, in order to inform the consultation.
C) The report must be taken into account, alongside consultation responses, when finalising the plan	
The environmental report [and] opinions expressed pursuant to [consultation] shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.	This report, and consultation responses received, will be taken into account when finalising the plan. It should also be noted that an earlier report informed the pre-submission consultation, and consultation responses received informed subsequent work.


Appendix 2: High level growth scenarios

As discussed in Section 5, in 2023 and earlier in 2024 a focus of work was to explore high level growth scenarios through assessment and consultation. The situation has now moved on, such that this work is no longer entirely 'policy relevant' (given latest understanding of the NPR remit / scope / objectives), but it is nonetheless considered appropriate to present earlier work on high level growth scenarios here. Specifically, set out below is the assessment previously presented within Section 6 of the Environmental Report that was published as part of the pre-submission consultation earlier in 2024. Please note that the assessment has not been updated at all, such that some of the analysis is now somewhat out-of-date.

Methodology

This section presents an assessment of the three Scenarios under the SEA framework. Each assessment comprises a commentary that aims to discuss the relative merits of the Scenarios and then reach conclusions on an order of preference and significant effects. Each assessment also includes a summary table that: A) ranks the scenarios in order of preference;⁵ and B) categorises the performance of each scenario in terms of significant effects (red / amber / light green / green).⁶

Accessibility (to community infrastructure)

Scenario 1 West	Scenario 2 South	Scenario 3 West and south
2	2	1 

A priority issue is minimising pressure on existing community infrastructure locally. As part of this, opportunities should be taken to direct growth to realise opportunities for delivering new / upgraded community infrastructure, potentially to the benefit of the existing community ('planning gain').

Under all scenarios there would be the potential to deliver new school capacity, as well as other strategic community infrastructure, and the scale of the opportunity is likely to correlate with the scale of growth. On this basis, there is tentative support for Scenario 3. However, there is considerable uncertainty ahead of certainty that component landowners work effectively together ('equalisation').

With regards to the question of Scenario 1 versus Scenario 2, the latter would involve a greater quantum of growth, but the degree to which this would translate into additional opportunity / benefits is not entirely clear. The potential to deliver a new 'public transport hub' has been discussed - linking to Milton Keynes, Winslow, Silverstone and potentially other key locations - and the potential to expand this concept to include a community and/or health hub might be envisaged.

Another consideration is links to the town centre and the town's secondary schools hub / leisure centre, and 'big box' retail along the A421 is a further consideration. In this regard, there is a concern regarding to the southeast (either side of London Road), given Buckingham Industrial Estate and the recent and the Lace Hill neighbourhood, which was delivered approaching ten years ago without a focus on accommodating further expansion. Having said this, Lace Hill delivered a new primary school and community centre at the edge of the development, which could feasibly become a central component of an expanded community, and there is reasonably good walking/cycling infrastructure along the London Road linking to Buckingham Town Centre (plus good bus links to Winslow).


In **conclusion**, Scenario 3 could deliver significant new community infrastructure alongside housing growth and, whilst there is some uncertainty, the assumption is that this could be to the benefit of the wider town (i.e. new infrastructure would do more than 'consume the smoke' of the new community). As such, notable positive effects are predicted. It is recognised that there will be local concerns with a higher growth strategy, in terms of capacity of / access to community infrastructure. However, at this stage, is difficult to evidence significant concerns that could not be addressed by 'good growth'. Also, it is important to recall that – with a long-term

⁵ A star is used to highlight the scenario(s) ranked first, "=" is used where the alternatives perform broadly on a par; and "?" is used where uncertainty prevents differentiation between the scenarios.

⁶ **Red** indicates a significant negative effect; **amber** a negative effect of limited or uncertain significance; **light green** a positive effect of limited or uncertain significance; and **green** a significant positive effect. **No colour** indicates a neutral effect.

perspective – planning comprehensively for growth now would reduce the risk of piecemeal growth over time leading to infrastructure opportunities missed.

Air quality

Scenario 1 West	Scenario 2 South	Scenario 3 West and south
 1	3	2

Air quality itself is not a key issue locally. Monitoring of air pollutants linked to transport, specifically nitrogen dioxide (NO₂), occurs in several locations across the Buckingham neighbourhood area, but there are no recorded exceedances of the UK air pollutant annual targets.


New housing growth on the scale under consideration will lead to an increase in traffic on the roads, leading to a degree of congestion and, in turn, air pollution. In particular, particulate matter (PM) pollution a key consideration given the switchover to electric vehicles. However, there is good potential to avoid impacts through the location of homes and delivery of new/upgraded infrastructure.

A key issue is the need to avoid traffic through the historic town centre, where there is a risk of problematic congestion and air quality, plus generally a poor-quality local environment due to heavy traffic. In this regard, there is a particular case for supporting growth to the west of Buckingham (Scenario 1), in order to deliver a link road between the A421 and the A422, which would complete a bypass of the town for those travelling between Brackley and Milton Keynes / Winslow. Growth to the south could also deliver a new link road (subject to landowner collaboration), but the strategic case for this is less immediately apparent (although see discussion below under ‘Communities’). A final consideration is whether some car trips between growth locations to the west of the town and Milton Keynes (a key destination) would choose to route through the town centre even with a new link road.

With regards to Scenario 3 (west and south), there is considerable uncertainty. On the one hand, traffic congestion through the town centre is a significant issue such that there is a case for seeking to restrict growth at Buckingham. However, on the other hand, planning for comprehensive growth (i.e. avoiding piecemeal growth over time) would help to secure investment in / strategic planning for infrastructure, including transport infrastructure (both road infrastructure, including in support of public transport, and active travel infrastructure) and community infrastructure (thereby reducing the need to travel and enabling more trips to be made by walking and cycling, i.e. active travel).

In **conclusion**, there is a clear case for Scenario 1 with a focus on reducing town centre traffic congestion, and there is also tentative support for Scenario 3. Neutral effects are predicted under all the scenarios, as that whilst transport / traffic is a key issue locally, air quality is not a major issue.

Biodiversity

Scenario 1 West	Scenario 2 South	Scenario 3 West and south
2	2	 1

A first point to make is that, whilst none of the three scenarios will bring forward growth within proximity to European or nationally designated site, the proposed levels of growth will require consultation with Natural England due to an overlap with Sites of Special Scientific Interest (SSSI) Impact Risk Zones.

The next matter for consideration is then locally designated Local Wildlife Sites (LWS); however, data is not currently available to show the location of LWSs. There is also one Local Nature Reserve (LNR) in Buckingham, but it is designated primarily for geodiversity and is distant from the growth options.

The next matter for consideration is priority habitat, which is not a formal designation, but is mapped nationally (see magic.gov.uk). Buckingham’s primary concentration of priority habitat is associated with the former railway line to Brackley, and this is a constraint to growth to the west of Buckingham, particularly when taken into account alongside the adjacent corridor of the River Great Ouse. There is little or no priority habitat along the

river corridor, but it is nonetheless clearly has biodiversity value. However, there would be good potential to avoid any issues and also realise opportunities (in respect of habitat creation and enhancement) assuming a comprehensively masterplanned scheme.

A final area of sensitivity is found to the southwest of Buckingham Industrial Estate / south of Swan Business Park and Aldi. The nationally available dataset shows limited priority habitat here, but there is extensive mature vegetation associated with the Buckingham Brook corridor, which is shown on historic satellite imagery (WWII aerial photography is available from Google Earth). There are further areas of mature trees, including three linked copses, but this is recent planting (c.2006).

N.B. the bulk of land here is already committed, in that it is a Vale of Aylesbury Local Plan (VALP) allocation and has planning permission (ref. [19/00148/AOP](#)). Figure A shows the masterplan (as set out within the Design and Access Statement, 2021). This includes the land that is most sensitive from a perspective of wishing to protect/enhance the Buckingham Brook. However, from Figure 4.1 it can be seen that further expansion could also give rise to a degree of concern in terms of wishing to buffer the brook corridor and support ecological connectivity / avoid landscape-scale habitat fragmentation.

Figure A: Masterplan (2021) for the permitted Land off Osier Way scheme



Three final considerations are:

- The spring that rise to the south of Buckingham Industrial Estate and forms a stream that flows south to meet the Padbury Brook, along which there is some bankside vegetation (noting that this area of potential sensitivity links closely to the aforementioned area the SW of the industrial estate).
- The Padbury Brook to the SE of Buckingham, along which there is extensive priority habitat. Any further expansion of the town to the SE must not encroach unduly on the brook corridor, and there is a need for long-term strategic planning for the corridor at a landscape scale.
- Historic field boundaries, particularly with a focus on those shown on the oldest historic Ordnance Survey maps (see maps.nls.uk/). Field boundaries mostly show a geometric pattern indicative of 17th and 18th century enclosure, but satellite imagery shows some variation in terms of the strength of field boundaries, e.g. field boundaries appear weaker to the SE than is the case to the SW.

In light of the discussion above, there is support for Scenario 3, which would likely give rise to greater opportunity to deliver greenspace within the site boundaries and would also generate funds (over-and-above the lower growth scenarios) that might be directed towards realising biodiversity and associated ecosystem service opportunities. This conclusion is reached accounting sensitivities overall are quite limited in the sub-regional context (i.e. it is not possible to simply conclude that lower growth is preferable in biodiversity terms, as the effect could be to increase pressure for growth elsewhere).

Conversely, Scenario 1 could lead to pressure on the (somewhat) sensitive River Great Ouse corridor, whilst Scenario 2 could lead to pressure on the Buckingham Brook Corridor southwest and/or the unnamed stream corridor to the south, and there could also be a concern regarding expansion of the town encroaching on the Padbury Brook corridor.

In **conclusion**, there is tentative support for Scenario 3, and Scenarios 1 and 2 are judged to perform broadly on a par. There are no concerns regarding significant negative effects, and it could be that Scenario 3 delivers benefits of note, but there is little certainty at this early stage.

Climate change adaptation

Scenario 1 West	Scenario 2 South	Scenario 3 West and south
2	★ 1	★ 1

A key climate change adaption consideration is flood risk, and this is a particular issue for Buckingham, given the town’s close association with the River Great Ouse.

Growth to the west of the town (Scenarios 1 and 3) does give rise to concerns given the river corridor. It is fair to assume that development would avoid the flood risk zone, and that the flood risk zone would be defined accounting for climate change, but there is a need to consider the size of the undeveloped buffer between development and the flood risk zone, including given inherent uncertainties associated with modelling the impacts of climate change on rainfall, storminess etc. Also, there is a need to consider the effect of infrastructure associated with housing growth on the flow of water and water storage within the floodplain, particularly new road infrastructure.

In this light, there is support for Scenario 3 over Scenario 1, as there would be increased potential to maintain a generous greenspace buffer between built form and the flood risk zone. Also, the scale of growth under Scenario 3 could increase the chances of funding being made available to deliver enhancements to the baseline situation, in terms of flood storage / attenuation, feasibly resulting in a flood risk betterment, noting existing flood risk affecting the town centre downstream.

With regards to Scenario 2, there are few concerns in respect of flood risk. Two stream corridors pass through this area, as discussed above (under Biodiversity), but there would be excellent potential for a comprehensively masterplanned scheme to accommodate these as part of the green infrastructure.

In **conclusion**, it is fair to flag a potentially significant concern with Scenario 1. However, there is likely to be a solution following detailed work on masterplanning, Sustainable Urban Drainage Systems (SuDS) and potentially new strategic flood storage.

Climate change mitigation

Scenario 1 West	Scenario 2 South	Scenario 3 West and south
2	2	★ 1

A primary focus here can be on the matter of built environment decarbonisation, recognising the potential to consider carbon / greenhouse gas emissions from transport below. Transport emissions are the primary climate change mitigation consideration here, but there is also a need to ensure early consideration of built environment decarbonisation issues and opportunities.

A key consideration is that growth at scale can benefit from stronger development viability than smaller scale growth (all other things being equal, and particularly assuming that growth at scale does not trigger the need for new costly infrastructure, e.g. road infrastructure or wastewater treatment). In turn, this can mean that growth at scale leads to additional opportunity to deliver net zero development (or development that otherwise achieves decarbonisation standards that go beyond the minimum standards set out in Building Regulations). However, there is much uncertainty ahead of further work, including evidence that the landowners would be willing to collaborate on a comprehensive scheme that is greater than the sum of its parts. To date a detailed vision document has been made available only for a ~800 home scheme to the southwest (see Figure B, noting that it also shows the aforementioned committed Osier Way scheme, adjacent to the east), and this does not include any discussion of net zero development or otherwise taking an ambitious approach to decarbonisation.

In this light, there is support for Scenario 3. Also, it is fair to highlight that Buckingham has strong development viability in the sub-regional context, which serves to suggest that Buckingham is quite well suited to a higher growth strategy, from a perspective of wishing to deliver net zero development. However, on the other hand, it is understood that there may be some challenges locally in terms of capacity of the electricity grid (a key issue assuming reliance on heat pumps; also EV charging).

With regards to differentiating between Scenarios 1 and 2, on the one hand Scenario 2 would involve a larger scheme; however, on the other hand, it would need to deliver significant new road infrastructure that would require collaboration between several landowners, which could create viability/delivery challenges, which ultimately impact on the decarbonisation ambition. This has recently been the experience at Bicester, where North West Bicester Ecotown (as allocated in 2015) has recently been rebranded simply as North West Bicester, and the decision has been taken to support an additional 1,000 homes to assist with delivery (see the Draft Cherwell Local Plan, 2023).

In **conclusion**, there is support for growth at scale and, in turn, a preference for Scenario 3. With regards to effect significance, the risk of negative effects is predicted under the two lower growth scenarios, recognising the urgent need to achieve a steep decarbonisation trajectory (albeit Buckinghamshire has not declared a net zero target date in advance of the national 2050 target date).

Figure B: Site promoter masterplan (December 2023) for a potential scheme to the southwest of Buckingham



Communities and wellbeing

Scenario 1 West	Scenario 2 South	Scenario 3 West and south
★ 1	3	2

Discussion under this heading is an opportunity to consider communities related issues and opportunities over-and-above accessibility to community infrastructure (which is discussed above).

There are many issues that could potentially be discussed, but there is a need to focus attention on those that could potentially allow for differentiating between the current high-level scenarios.

Perhaps the primary issue is around reducing the severance created by the current A421, which is important from a health and safety perspective (including in respect of school children), plus there is generally a need to ensure that new communities to the south of the town are well-integrated with the long-established communities to the north. In turn, there are implications for the issue of ensuring that Buckingham maintains its identity as a historic market town, whilst at the same time taking on a greater role as a home for commuters to Milton Keynes, Silverstone and other key employment hubs.

In light of these points, there is support for Scenario 2, which would deliver a new link road to the south of the town. However, there is uncertainty regarding the extent to which it would be used as an alternative to the A421 and, in turn, reduce the severance effect. Also, if the new road itself could create a severance effect if it is the case that there are new communities to the south of it.

In turn, a related key issue is around comprehensive planning and avoiding the risk of long term 'sprawl'. In this regard there are concerns around further expansion to the south and southeast, given the river valley topography (whilst, in contrast, further expansion to the southwest could be relatively well contained by rising topography towards Gawcott). Linked to this, there are also concerns regarding effectively integrating further expansion to the southeast given Buckingham Industrial Park and the recent Lace Hills development, as discussed above.

In **conclusion**, there is support for Scenario 1 as new communities to the west would relate quite well to the existing settlement edge and the town centre, whilst there are some concerns with regards to further expansion of the town to the south and the southeast. However, the significance of concerns is not clear at this stage, ahead of further work to explore masterplanning options.

The figures below aim to support the above discussion. Both are taken from a current pending planning application for 300 homes plus employment land to the south of Buckingham Industrial Park / west of London Road. The first serves to highlight that land to the west of Buckingham would relate relatively well to the historic town centre, although here are some services and amenities in the southern part of the town. The second serves to illustrate that the existing Industrial Park would represent a significant barrier to movement for any new community to the south.

Figure C: Services and facilities in central and southern Buckingham (from application 23/00178/AOP)

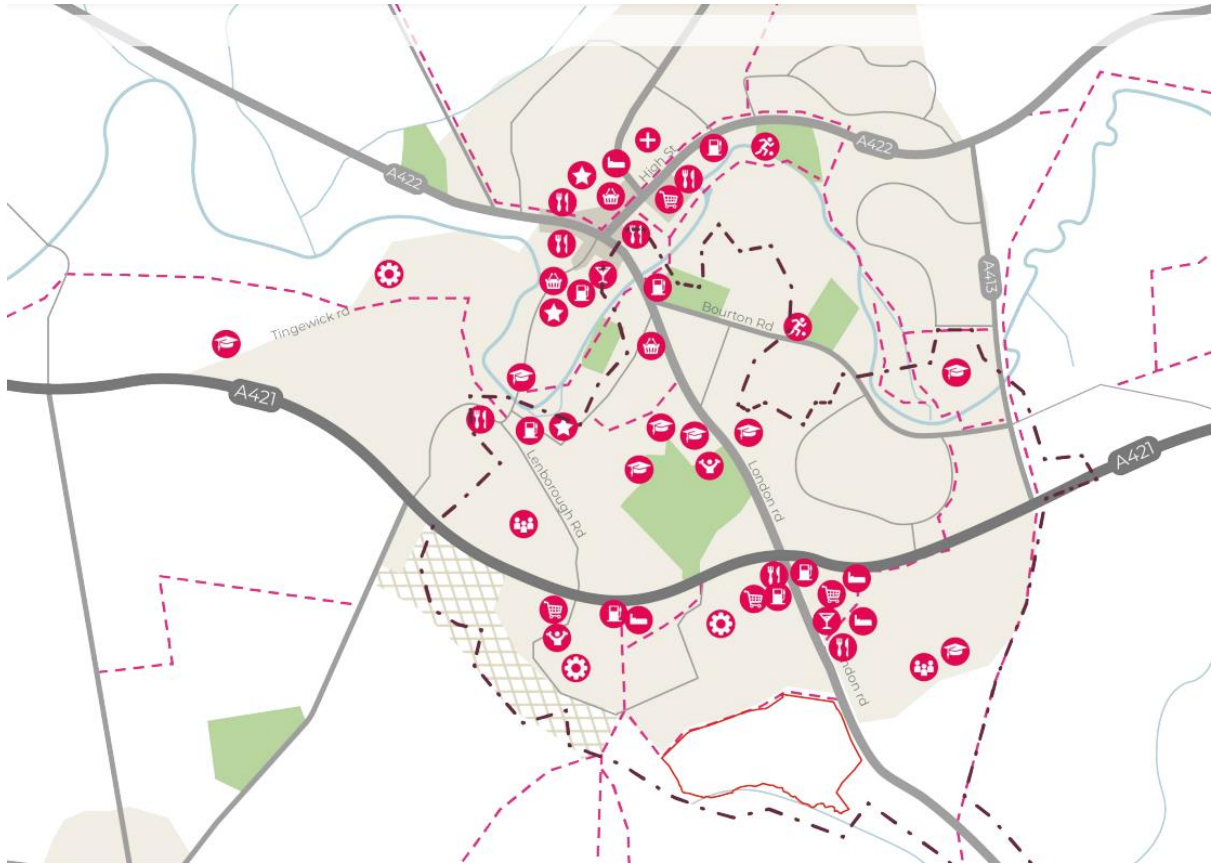


Figure D: Proposed masterplan for a 300 home residential led scheme (application 23/00178/AOP)



Economy and employment

Scenario 1 West	Scenario 2 South	Scenario 3 West and south
★ 1	2	★ 1

A primary consideration here is the existing employment land allocation for a 10ha expansion of Buckingham Industrial Park, which would alternatively be delivered as housing / a housing-led scheme under Scenarios 2 and 3. Buckingham is an important location for manufacturing and precision engineering, given links to both Silverstone and Milton Keynes. However, on the other hand, there is a need to provide for high quality homes, including family homes, in order to support a skilled workforce that enables this nationally important employment cluster to thrive and grow, including capitalizing on links to both Oxford (and the wider Oxford Knowledge Spine) and Cambridge.

It is also recognised that no planning application has been submitted for the employment site, despite having been allocated for nine years, and that there is currently a pending planning application for an residential-led scheme involving 300 homes (ref. [23/00178/AOP](#)). The planning application includes an ‘Employment Land Statement’ (2022) which states that there has been no market interest in the site (for the allocated employment uses), concluding that this is because potential occupiers of large scale industrial sites, such as the site in question, would prefer to locate at Milton Keynes or Northampton, with the demand at Buckingham more for small scale industrial sites.

In **conclusion**, it is fair to flag a concern with Scenario 2, as there would be limited or no potential to deliver new employment land adjacent to Buckingham Industrial Park, albeit the analysis regarding lack of market demand for large-scale new employment land here is noted. Conversely, under Scenario 3 there could be flexibility to deliver new employment land (perhaps on a smaller scale than envisaged by the Neighbourhood Plan allocation), plus there is generally support for housing growth and new road infrastructure in a broad area that is nationally significant in terms its economic offer.

Historic environment

Scenario 1 West	Scenario 2 South	Scenario 3 West and south
?	?	?

All of the potential growth locations are quite remote from nationally designated assets and the town centre conservation area, with the land in question historically being a rural farmed landscape. However, the historic environment is nonetheless a key issue for this assessment of growth scenarios, given the larger-than-local significance of the town centre in historic environment terms, including on accounts of its links to the renowned landscaped parklands of Stowe to the north.

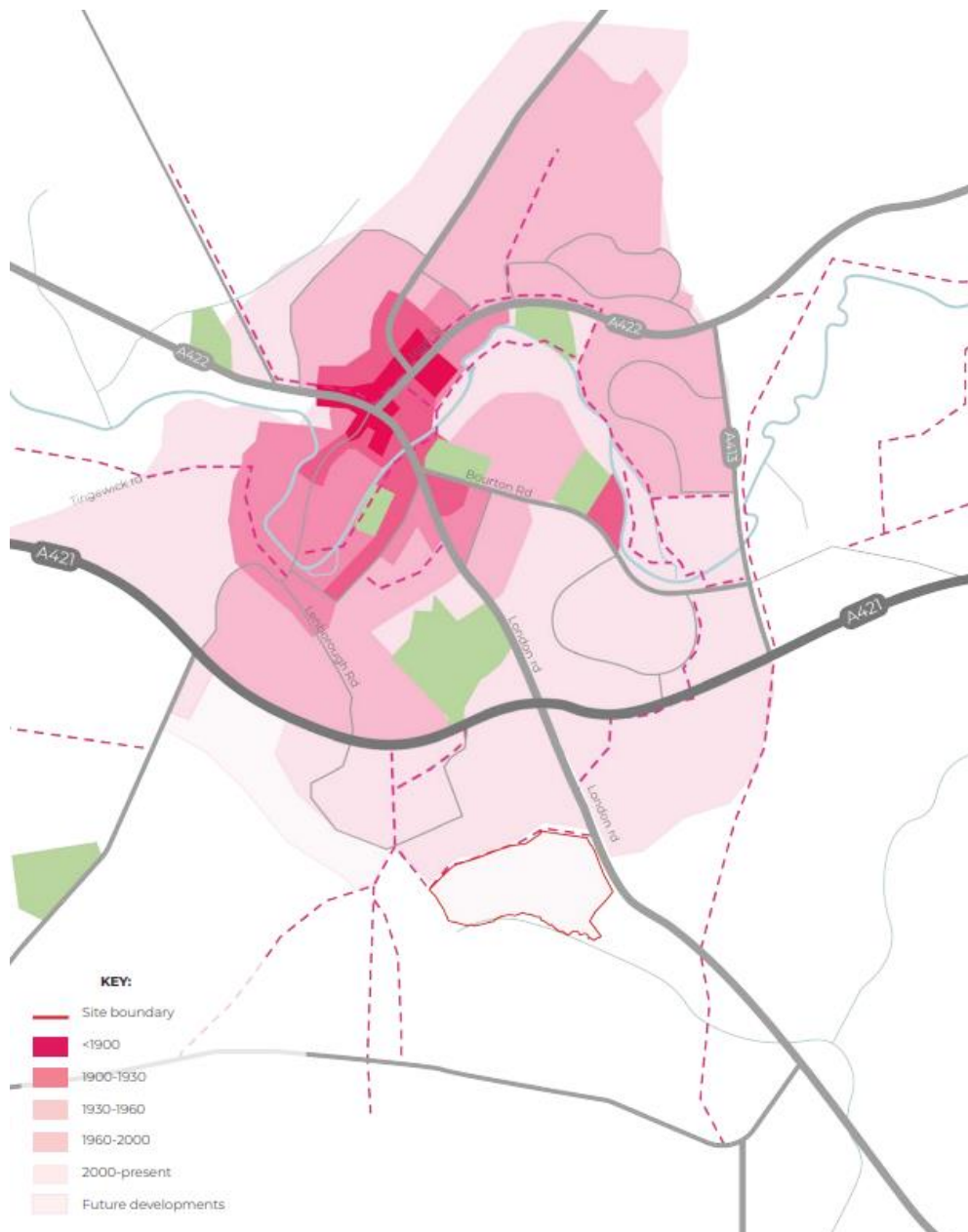
As discussed above, expansion to the west would involve new homes and infrastructure in relatively close proximity to the town centre; however, historic environment concerns are still limited. There would presumably be some increase in traffic along the Brackley Road, which links to Stowe Registered Park and Garden (specifically the Grand Avenue) and the town centre conservation area (also a Victorian Cemetery and some other historic built form to the west of the town centre), but this would be limited on the assumption of a new link road to the south (as discussed). There would be impacts to the river corridor landscape, but it is difficult to conclude this is a historic environment issue.

Finally, in respect of Scenario 1, there is a need to consider the matter of maintaining a landscape gap to Radclive, which is a hamlet with a clear historic character, including a Grade I listed parish church, and as reflected in a designated conservation area. Maintaining a strong landscape gap is considered to be an important objective, from a historic environment perspective. However, on the other hand, it could be that expansion to the west (Scenarios 1 and 3) delivers a new link road that serves to address the existing issue of rat running through the centre of the hamlet. Also, the possibility of a new public footpath link that takes walkers (and perhaps also cyclists) through the historic core of the hamlet, as part of a walk that ultimately leads to Tingewick, might be envisaged.

With regards to expansion to the south, there are a range of landscape concerns that have a historic environment 'dimension', but there is overall limited historic environment constraint. Rising topography would clearly allow for maintenance of a large landscape gap to Gawcott; whilst development would encroach upon several historic farmsteads none are known to have particular heritage value; the bridleway that passes south from Buckingham Industrial Park is shown on historic maps as a footpath, as opposed to a lane that might have historic character; the shallow valleys / river and stream corridors in this area are not likely to be particularly appreciated or valued from a historic environment perspective; and the field boundaries in this area likely date from enclosure (as discussed). On point to note is that the Bernwood Jubilee Way, which currently bounds the southern extent of the recent Lace Hill development, does appear to follow the route of a historic lane, at least in part.

In **conclusion**, it is very difficult to differentiate the alternatives with confidence. On the one hand there are arguments for comprehensive growth, including because it would allow for greater use of greenspace / green infrastructure to minimise historic environment concerns, e.g. there could well be added potential for a larger landscape buffer to Radclive (assuming that landowners work in collaboration, i.e. there is effective land equalisation). However, on the other hand, Buckingham is inherently sensitive in historic environment terms, such that there is a clear case for restricting growth. On balance uncertain effects must be concluded at this stage, ahead of consultation with Historic England (N.B. it is noted that Historic England did not respond to the SEA Scoping consultation).

Figure E: Age of built form serving to highlight the traffic challenge (from 23/00178/AOP)



Homes

Scenario 1 West	Scenario 2 South	Scenario 3 West and south
3	2	★ 1

There is currently little certainty regarding the number of homes that are needed locally. Some clarity may be gained through ongoing work on a Housing Need Assessment (HNA), but HNA at the scale of individual towns such as Buckingham is more able to reach conclusions on the required housing mix, and number of specific types of homes required (affordable housing and specialist housing) than on the overall need for housing (i.e. to include market housing). Overall housing need will be determined for Buckinghamshire Council – whether using the Government’s standard method, which indicates a need for ~3,000 homes per annum, or an alternative method (see NPPF paragraph 61) – and then it will be the role of the Buckinghamshire Local Plan to consider strategy and supply options before determining how many homes are required at Buckingham (see NPPF paragraph 67).

However, it is plainly the case that the number of homes needed to meet locally arising needs is significant, plus there is a need to consider the role of Buckingham in terms of providing homes to meet the needs of those who commute to work elsewhere in a nationally important sub-region. Also, there is a need to recognise that the locally arising need for affordable housing (i.e. housing available for below market price for those who qualify) is invariably more than can be delivered (by market-led developments that typically deliver affordable housing at a rate of perhaps 35-40%) and so there is invariably an ‘affordable housing’ argument for maximizing housing growth.

In **conclusion**, it is appropriate to rank the alternatives in order of total growth quantum, albeit under the highest growth scenario (at least) it could be the case that the number of homes delivered would be in excess of what is needed in order to provide for ‘locally arising’ housing needs. Ahead of the Buckinghamshire Local Plan determining the number of homes required all of the scenarios reflect a proactive approach to housing growth (recalling that there would also be housing growth within the urban area under all scenarios, plus likely some housing growth to the east of the town in the vicinity of the canal) and it is fair to say that Scenario 3 would represent a highly proactive approach.

Landscape

Scenario 1 West	Scenario 2 South	Scenario 3 West and south
★ 1	3	2

All of the potential growth scenarios would involve directing growth away from the most sensitive landscapes, namely rising land towards Stowe to the north of the town, and the river valley / canal corridor landscape to the east of the town (as appreciated from the A422 and the Ouse Valley Walk).

However, there are clear landscape sensitivities. Beginning with option of expansion to the west of the town, there is a clear landscape concern associated with development along the river corridor, and the key matter of maintaining a landscape gap to Radclive has already been discussed (although there could also be a degree of opportunity, in terms of a potential new walking / cycling link). Final points to note regarding the option of expansion to the west are:

- The field boundaries associated with the river corridor are likely to be of considerable value.
- The Bernwood Jubilee Way passes through this area, but it is not clear the extent to which it allows for an appreciation of the river valley / corridor landscape. The former disused railway line is not used as a footpath, which could represent an opportunity to explore.
- There would be little or no risk of future ‘sprawl’, and there is generally a landscape argument for containing the expansion of Buckingham within the valley of the River Great Ouse.

With regards to the option of expansion to the south, there is ultimately a concern regarding long-term 'sprawl', particularly to the south and southeast, where land descends towards the valley of Padbury Brook. In contrast, expansion to the southwest could be contained, at least to some extent, but rising land towards Gawcot, plus there are some landscape features here to draw upon for containment.

Ultimately, whilst the potential to plan comprehensively for the long-term future expansion of Buckingham to the west and southwest (in a way that maximises opportunities to deliver new infrastructure, avoiding opportunities missed as a result of piecemeal expansion) can be envisaged, it is more difficult to envisage in the case of expansion to the south and southeast. In turn, there is a need to proceed with caution, and ensure that all options are explored. In this regard, it is noted that the option of a new settlement / garden community to the east of the town has been considered but is currently ruled-out on account of the land not being available. Options should continue to be explored.

In conclusion, it is fair to flag the option of expansion of west as having a degree of relative merit in landscape terms, notwithstanding the issue of maintaining a landscape gap to Radclive (which is more of a historic environment consideration). Scenario 3 is favoured over Scenario 2 as it would allow more flexibility around masterplanning in support of landscape objectives, including new areas of strategic greenspace (feasibly even on the scale of a new country park). Significant negative effects are not predicted recalling that the landscapes in question are not designated.

Soils/ resources

Scenario 1 West	Scenario 2 South	Scenario 3 West and south
2 (amber)	1 (amber)	3 (amber)

A primary consideration here is avoiding the lost of best and most versatile (BMV) agricultural land, which is land of grade 1, 2 or 3a quality. However, an issue is that the nationally available dataset does not differentiate between grades 3a and 3b and is also very low resolution / low accuracy. Accurately confirming agricultural land grade requires field surveys, and Buckingham does benefit from a large amount of field surveying having been undertaken, with the findings uploaded to the national dataset (see the 'post 1988' dataset at magic.gov.uk).

What the data at magic.gov.uk shows is that agricultural land quality is a significant constraint to growth locally. The low-resolution national dataset shows all of the land in question to be of 'grade 3 quality'; however, much detailed surveying work has been undertaken, which shows quite extensive land of grade 3a and also grade 2. It appears likely that land to the southeast comprises lower quality agricultural land (grade 3b), but it is difficult to be certain.

In **conclusion**, there is a case for minimising growth at Buckingham from a perspective of aiming to protect BMV agricultural land. The quantum of land lost under all scenarios is arguably significant.

Transport

Scenario 1 West	Scenario 2 South	Scenario 3 West and south
? (amber)	? (amber)	? (amber)

Transport is a key issue for the current assessment, although most of the specific issues and opportunities have already been discussed above. There is a clear strategic case for a new link road to the west of the town, and there may also be a strategic case for a new link road to the south of the town, although this is less readily apparent. With regards to minimising the need to travel and supporting modal shift away from the private car towards active and public transport, the option of further expansion to the south and southeast is problematic in terms of achieving good links to Buckingham town centre; however, on the other hand, the land here does benefit from good links to Winslow (East West Rail station) and Milton Keynes. There is also a need to question the deliverability of a new road link to the south of the town that passes across several land ownerships.

More broadly, in respect of the merits of a new link road to the south of the town, there is a need to question whether this new road infrastructure would align with the national and local move away from a ‘predict and provide’ approach to transport planning and towards a new ‘decide and provide’ approach. A very recent report by Create Streets and Sustrans highlights the possibility of supporting higher density ‘vision-led’ development that avoids the need for new road infrastructure, with funding alternatively directed towards measures aimed at minimising the need to travel and modal shift away from the private car; see <https://www.createstreets.com/projects/stepping-off-the-road-to-nowhere/>.

In conclusion, this is such a key issue that it would not be appropriate to draw conclusions at this stage, ahead of further work. There is a need to consider the potential for higher density development, opportunities to deliver new community infrastructure, new walking and cycling links, bus services to Winslow, objectives for upgrading the A421 corridor to Milton Keynes and minimising (even reducing) traffic through the historic town centre. It is appropriate to flag a risk of negative effects at this stage, taking a precautionary approach, recalling that Buckingham does not benefit from a train station and given existing issues of traffic through the town centre.

Figure F: Bus routes locally (from 23/00178/AOP; N.B. bus stops shown are not comprehensive)



Water

Scenario 1 West	Scenario 2 South	Scenario 3 West and south
=	=	=

A Water Cycle Study is being prepared in support of the Buckinghamshire Local Plan, and will soon be published. Key matters covered in such studies typically include:

- Water resources – this is not likely to be a key issue for Buckingham but is more of a consideration in the south of the County, given chalk streams fed by groundwater.
- Wastewater collection – delivering new sewer infrastructure is rarely a significant constraint to growth, but it can be an issue in some areas, e.g. new settlements in notably rural areas. It is unlikely to be an issue with a significant bearing on the current assessment (subject to further discussions with the water company).

- Wastewater treatment – this is often a key issue for local plans and is high on the agenda nationally and locally. There are not known to be any particular issues locally, in contrast to the south of the County, where a number of areas are notably constrained in terms of wastewater treatment. In 2022, the storm overflow at Buckingham Water Recycling Centre / Wastewater Treatment Works spilled 26 times for a total of 241 hours, as shown at: theriverstrust.org/sewage-map). However, it could well be that there is capacity to upgrade the works. Also, the possibility of delivering a new works under a high growth scenario should not be entirely discounted, e.g. this is anticipated at a garden village for 5,000 homes (along with associated new wetland habitats) allocated within the Maidstone Local Plan (see para 112 of the Inspectors Report, March 2024).

In **conclusion**, there appear to be relatively few key issues with a bearing on the current assessment.

Assessment conclusions

The assessment serves to highlight Scenario 3 (higher growth) as having merit in quite a wide range of respects. This reflects a view that there are arguments for planning strategically for comprehensive growth rather than risking piecemeal growth over time with commensurate opportunities missed in respect of securing investment in infrastructure and wider ‘planning gain’. However, Scenario 3 also has drawbacks, and it is important to note that the topics are not weighted in any way. In particular, further work could well serve to highlight concerns with higher growth in respect of transport and/or historic environment objectives, the decision might be made that these objectives should be assigned particular weight (potentially alongside objectives around landscape and agricultural land) and, having done so, the conclusion might be reached that there is a need to support a lower growth scenario.

The next step is to draw upon this assessment of high-level scenarios, alongside wider evidence (including consultation responses and key messages received through wider engagement work) and then to decide a preferred approach (to growth) and reasonable alternatives for assessment and consultation. The requirement is for alternatives to reflect “the objectives of the plan” and so it will be important to rule out any growth scenarios that would not do so. The alternatives should be defined quite tightly around the preferred option, as far as possible, i.e. as far as the evidence allows.

