

Sustainability Appraisal (SA) of the Buckinghamshire Local Plan

SA Report

July 2026

Quality information

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Non-technical Summary

This is the SA Report published alongside the final draft ('proposed submission') version of the Buckinghamshire Local Plan. This report presents an appraisal of the plan as well as 'reasonable alternatives' with a view to informing representations on the plan and then subsequent plan finalisation. Specifically, in light of representations received the Council will determine whether the plan is 'sound' such that it can be submitted for an examination in public overseen by the Planning Inspectorate, who will then consider the need for modifications with a view to soundness.

Part 1 of the report deals with reasonable alternatives, and specifically presents an appraisal of six reasonable alternative 'growth scenarios', defined as alternative approaches to allocating sites in order to provide for development needs over the plan period, which is the period 2024 to 2043.

Specifically, six scenarios are defined and appraised, as set out in Table A, where **Scenario 1** is the preferred growth scenario. In comparison to Scenario 1: **Scenarios 2 to 5** involving removing one New and Expanded Settlement Study (NESS) site and adding an indicative package of Green Belt omission sites; whilst **Scenario 6** involves adding the indicative Green Belt omission sites.

N.B. Table A breaks down the supply under each of the scenarios and, as part of this, breaks down new proposed allocations (i.e. allocations over-and-above those that are already committed) into 9 categories (A1, A2, etc). Also the final row compares total supply to local housing need (LHN).

Table A: The RA growth scenarios (constants greyed-out)

Supply component	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6
Completions & commitments	24,982	24,982	24,982	24,982	24,982	24,982
Windfall	10,438	10,438	10,438	10,438	10,438	10,438
A1 Part commitments	3,339	3,339	3,339	3,339	3,339	3,339
A2 Town centre sites	4,594	4,594	4,594	4,594	4,594	4,594
A3 Constant NESS sites (x6)	16,567	16,567	16,567	16,567	16,567	16,567
A4 Cheddington NESS site	3,650	0	3,650	3,650	3,650	3,650
A5 Beachampton NESS site	3,200	3,200	0	3,200	3,200	3,200
A6 Stoke Mandeville NESS site	1,650	1,650	1,650	0	1,650	1,650
A7 Wing NESS site	1,630	1,630	1,630	1,630	0	1,630
A8 Other sites (non-Green Belt)	21,243	21,243	21,243	21,243	21,243	21,243
A9 Other sites (Green Belt)	0	4,000	4,000	4,000	4,000	4,000
Total supply 2024-2045	91,293	91,643	92,093	93,643	93,663	95,293
% over LHN (91,000)	0%	1%	1%	3%	3%	5%

The appraisal involves considering the merits of the six scenarios under the 'SA framework', which comprises a list of 13 sustainability topics (each with an associated objective). The appraisal shows a mixed picture, with all of the scenarios associated with pros and cons, and it is for the Council and wider stakeholders / interested parties to weigh the pros and cons before deciding on which of the scenarios best represents sustainable development 'on balance'.

Scenario 5 (the emerging preferred approach minus Wing NESS plus Green Belt sites) and Scenario 6 (the emerging preferred approach plus Green Belt sites) are shown to perform well under the greatest number of sustainability topics. However, this does not automatically mean that either Scenario 5 or Scenario 6 is appraised as performing best overall, because: A) the appraisal is undertaken with no assumptions made regarding the degree of importance ('weight') that should be assigned to each of the topics as part of decision-making (nor are the topics assumed to have equal weight); and B) numerous of the topic specific appraisal conclusions are open for debate.

The following bullet points provide a brief overview of topic-specific appraisal findings:

- Accessibility – it is not possible to differentiate between the scenarios and all of the scenarios perform reasonably well in terms of directing growth in line with community infrastructure issues and opportunities, e.g. with NESS sites set to deliver several new secondary schools.
- Air / environmental quality – there are unlikely to be major concerns regarding air pollution / air quality, but there are a range of transport-related uncertainties across all of the scenarios.
- Biodiversity – again it is not possible to differentiate between the scenarios, and overall there are limited concerns, although a focus of growth in the south (Green Belt) could create a challenge.
- Climate change adaptation – there are a number of sites that are a 'constant' across the scenarios where onsite flood risk requires further scrutiny, notably urban sites in Chesham and High Wycombe.
- Climate change mitigation – it is not possible to differentiate between the scenarios, but across the scenarios the concern is that growth would conflict with established decarbonisation commitments.
- Communities & health – directing growth to the Green Belt could risk challenges at certain settlements, and there is also a concern with transformational growth at Wing. Across the scenarios there are risks as this is the first consultation on a full draft plan. However, the baseline scenario is one involving ongoing growth at pace under the presumption in favour of sustainable development.
- Economy & employment – the proposed approach to delivering new employment land is broadly 'constant' across the scenarios and strongly supported; there is a case for higher housing growth involving Green Belt sites; and the proposed NESS site at Wing has limited economic rationale.
- Historic environment – constraints are widespread and Historic England has not provided comments. Three of the variable NESS sites are challenging, as are a number of sites held constant.
- Homes – all of the growth scenarios should enable a housing requirement set at LHN over the plan period, but there would be a 'stepped' requirement. This suggests a case for additional sites able to deliver relatively early and sites in the Green Belt would likely also be associated with low delivery risk and strong development viability, e.g. such that they can deliver a high rate of affordable housing.
- Landscape – constraints are widespread but Cheddington NESS site stands-out as there is visibility (at a distance) from the Chilterns escarpment, and this is also an issue for several other sites.
- Land / resources – there would be significant loss of 'best and most versatile' agricultural land under all scenarios; however, again, the baseline scenario is continued growth without a local plan.
- Transport – much work has been completed and there are many positives; however, the scale of the plan is such that there are remain uncertainties. Two of the NESS sites stand out as questionable.
- Water – inherent uncertainties regarding water resources and wastewater treatment, as is common for local plans in the south of England given the challenge of aligning growth and water infrastructure.

Part 1 of the report ends with Section 7, which presents the Councils response to the appraisal and, in turn, an explanation of why Scenario 1 is considered to be 'justified' on balance despite there being certain arguments to be made in favour of the alternative scenarios appraised:

"It is clear that there are challenges with Scenario 1, and arguments for supporting an alternative scenario, but supporting Scenario 1 as the proposed submission approach is nonetheless considered justified, in that Scenario 1 represents "an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence" (NPPF para 36).

A key message to come out of the appraisal is that there are arguments for directing higher growth to the south of Buckinghamshire, but this would involve Green Belt release, and there are not considered to be the 'exceptional circumstances' to justify any such approach.

Specifically, this is the case because under Scenario 1 it will be possible to set the housing requirement at LHN over the plan period (albeit with a stepped requirement), and the proposed strategy is considered to perform suitably well in terms of key objectives, and ultimately to represent sustainable development. There is considered to be a good spread and mix of sites, including having accounted for commitments (which includes sites in the Green Belt). This includes making best use of PDL and supporting higher densities, particularly in town centres (in support of Regeneration Strategies) and at locations in proximity to a well-connected station.

The appraisal also flags certain concerns with NESS sites that are a 'variable' across the growth scenarios (less so South of Stoke Mandeville, albeit there are certain challenges with this site including given the scale of growth in the vicinity, ongoing HS2 construction and visibility of this area from the Chilterns escarpment). However, all 10 of the NESS sites are ultimately considered to be 'justified' and the Council favours directing growth to large strategic-scale sites that are well placed to deliver new and upgraded infrastructure alongside new homes.

Finally, it is recognised that there is a case for supporting Scenario 6 because this could potentially (subject to future work to revisit the total supply in light of updated monitoring data on housing completions and commitments) enable the Local Plan to make some provision for unmet need from Slough. However, given progress with the Slough Local Plan, and also the Royal Borough of Windsor and Maidenhead Local Plan, there is currently insufficient evidence to enable a conclusion to be reached regarding the quantum of unmet need that should or might be provided for in Buckinghamshire."

Part 2 of the report appraises the Proposed Submission Local Plan as a whole, which in practice involves recapping on the appraisal of Scenario 1 and layering on understanding of the development management (DM) policies that are proposed in order to ensure that growth is delivered effectively, in particular site-specific policies.

The appraisal finds that the plan as a whole performs as per Scenario 1, in summary: a **moderate or uncertain positive effect** under three topics (accessibility, economy / employment, homes); a **neutral effect** under one topic (biodiversity); and a **moderate or uncertain negative effect** under nine topics (air / env. quality, climate change adaptation, climate change mitigation, communities, historic environment, landscape, soils / resources, transport and water). The appraisal does not predict a significant negative effect under any of topic, but this is marginal in some cases.

With regards to DM policies, given forthcoming 'national development management policies' (as proposed by the draft NPPF, 2025) a key consideration is site-specific policies, which must respond to locationally specific issues and opportunities and be deliverable in light of viability parameters. It is clear that detailed work has gone into site-specific policies, but they are yet to be scrutinised by promoters and stakeholders. There is support for concept masterplans having been prepared for the NESS sites, but there is a need to avoid false comfort and unduly constraining delivery (i.e. there is a need for flexibility, given the delivery timescales and many uncertainties). With regards to area-wide DM policies, it is noted that these have been tested through a Viability Study, which concludes that the plan is deliverable within viability parameters, but there is a need for ongoing scrutiny of the balance that has been struck between competing policy priorities with cost / viability implications; on matter that has been prioritised is water efficiency. There is a natural role for SA in terms of recommending additional policy requirements to address specific issues / risks, but additional requirements typically come with a cost and, in turn, knock on implications.

Part 3 of the report discusses next steps. Specifically, the next step is to consider representations received and implications for soundness. Assuming that the plan can still be considered 'sound' it will be submitted for Examination in Public (EiP) alongside a summary of the issues raised. It is important to be clear that there will not be the potential to make amendments to the plan (although minor/modest suggested amendments might be submitted alongside the plan).

The EiP will be overseen by one or more Planning Inspectors, and there will invariably be a consultation on proposed Main Modifications in order to address matters of plan soundness. Once found to be sound following EiP the Local Plan will be adopted, at which time an SA 'Statement' will present information including "measures decided concerning monitoring". At this stage a number of matters that might be a focus of future monitoring efforts can be suggested, in light of the appraisal, and one idea is to monitor a selection of key sites with a view to scrutinising how they deliver on local plan policies (e.g. infrastructure, flood risk) and whether they deliver on time.

1. Introduction

1.1. Background

- 1.1.1. AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Buckinghamshire Local Plan, which is being prepared by Buckinghamshire Council. Once adopted, the Plan will set the strategy for growth and change across Buckinghamshire up to 2045, allocate sites to deliver the strategy and establish policies against which planning applications will be determined.
- 1.1.2. SA is a process for considering and communicating the effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives.¹

1.2. SA explained

- 1.2.1. It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.2.2. In-line with the Regulations, a report (known as the **SA Report**) must be published for consultation alongside the draft plan that appraises “the plan and reasonable alternatives”. The aim of the report is to inform consultation and then plan finalisation.
- 1.2.3. More specifically, the SA Report must answer the following **three questions**:²
- What has Plan-making / SA involved up to this point?
 - including appraisal of ‘reasonable alternatives’
 - What are the SA findings at this stage?
 - i.e. in relation to the draft plan
 - What are next steps?

1.3. This SA Report

- 1.3.1. The final draft (‘proposed submission’) version of the Local Plan is currently published under Regulation 19 of the Local Planning Regulations (2012) and the Regulations set out that the SA Report should be published alongside. This SA Report supersedes the Interim SA Report published as part of Regulation 18 consultation in 2025 and the SA Note published as part of the sites engagement exercise in early 2026.
- 1.3.2. The aim of this report is to inform ‘representations’ on the Proposed Submission Local Plan and then plan finalisation (see discussion of ‘next steps’).

Structure of this report

- 1.3.3. This report is structured so as to answer each of the **three questions** introduced above in turn. Specifically, the questions are answered across three ‘parts’ of the report.
- 1.3.4. Before answering the first question there is a need to further set the scene by discussing the scope of the plan (Section 2) and the scope of the SA (Section 3).

¹ Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2021). The Town and Country Planning (Local Planning) Regulations 2012 require that an SA Report is published for consultation alongside the ‘Proposed Submission’ plan document.

² See **Appendix I** for further explanation of the regulatory basis for presenting certain information within the SA Report.

2. The plan scope

2.1. Introduction

- 2.1.1. The aim here is to briefly introduce the: context to plan preparation; the plan period; the plan area (ahead of more detailed discussion of key issues elsewhere in the report); and the objectives that are in place to guide plan preparation (the 'plan scope').

2.2. Context to plan preparation

- 2.2.1. Buckinghamshire Council was formed on 1st April **2020** and then plan-making begun in **2021** with an engagement questionnaire and two 'calls for brownfield sites'. This was followed by a wider call for sites in **2022**, a consultation on plan vision and objectives in **2023**, and then a fourth call for sites in **2025**. In late 2025 the Council then consulted on a high level draft plan that presented a series of broad spatial strategy options as well as draft development management (DM) policies, and an Interim SA Report was published alongside that present an appraisal of two sets of reasonable alternatives: 1) growth quantum; and 2) broad spatial strategy. This was followed by sites engagement in early **2026**, which involved presenting site options categorised according to potential for inclusion in the Local Plan. An SA Note was published alongside, and in total 10,000 responses were received. Subsequently, the Council undertook further technical and engagement work and finalised the Local Plan for publication under Regulation 19.
- 2.2.2. At the heart of the local plan-making process is the need to identify a 'supply' of land to meet development needs over the course of the plan period, with the National Planning Policy Framework (**NPPF**) clear on the need to maintain an up-to-date local plan that provides for development needs as far as is consistent with sustainable development.
- 2.2.3. Local housing need (**LHN**) is 4,344 dwellings per annum (dpa), as understood from the Government's standard method, which can be contrasted with delivery of 1,577 homes in 2024/25 and 2,522 dpa average delivery over the preceding ten years. 4,344 dpa is also notably a 43% increase on the previous standard method LHN figure (prior to the NPPF as published in December 2024), and neighbouring areas also saw increases to their standard method LHN in 2024, e.g. South Oxfordshire's more than doubled.
- 2.2.4. There is a strong expectation that local plans provide for LHN in full as well as any 'unmet need' from neighbouring areas where doing so would represent sustainable development. However, there can be scope to generate unmet need where necessary. Specifically, the question is whether the **housing requirement** should be set precisely at LHN or alternatively at a higher or lower figure, where the housing requirement is defined as the number of homes a plan commits to delivering, and where under-delivery risks policies in the plan being deemed 'out-of-date' for decision-making purposes.
- 2.2.5. Where policies in a plan are deemed out-of-date then planning applications can be considered under the '**presumption in favour of sustainable development**' (also known as the 'tilted balance'), as set out at NPPF paragraph 11.
- 2.2.6. The Council is currently subject to 'the presumption' because it cannot demonstrate a five year housing land supply (5YHLS) against its housing requirement,³ which is 4,344 dpa because a local plan housing requirement applies for five years from adoption and all adopted Local Plans in Buckinghamshire are more than five years old.⁴
- 2.2.7. As such, there is an **urgency** to progress a new Local Plan. Furthermore, there is an urgency because the Government has set a deadline of 31st December for local plans to be submitted under the current Regulations, such that if this deadline is missed the Council would likely have to restart the process under the new Regulations.

³ As well needing to maintain a 5YHLS, housing supply performance is also evaluated using the Housing Delivery Test (HDT).

⁴ It can be noted that the presumption also risks 'planning by appeal', i.e. a situation whereby the Council refuses an application only for it to be granted at appeal by an Inspector (and it should be noted that fighting appeals is costly and there can even be a risk of the Council having to pay the appellants costs if the Council is deemed to have acted unreasonably).

2.2.8. Plan-making has is clearly challenging due to the scale of the Buckinghamshire Local Plan, which is perhaps unprecedented, but key motivations include:

- The housing requirement in the new Local Plan will apply for 5YHLS purposes for a period of five years post adoption. As well as deciding what the requirement will be over the plan period as a whole, local plans are also tasked with considering what it should be for each year within the plan period, i.e. whether/how it should be 'stepped'.
- Whatever the housing requirement there is a need for a major boost to supply in order to deliver on it (i.e. ensure that the Council can maintain a rolling 5YHLS) and clearly the best way to boost supply is in a coordinated / strategic way through a local plan.
- Planning applications will continue to be decided under 'the presumption' until the Council can achieve a 5YHLS via a new Local Plan.
- Meeting housing needs is of great importance in-and-of itself and due to secondary benefits, for example in terms of health / well-being and supporting the local economy.
- A local plan is about 'place-shaping', so responding to settlement-specific issues and opportunities, and creating high quality new communities, including new settlements. Coordinated growth can also deliver on regeneration objectives for town centres.
- Plan-led housing growth creates an opportunity to strategically target investment and policy 'asks' of developers (in the context of development viability parameters), thereby maximising the benefits of growth and potentially delivering 'planning gain' (opportunities can and do go missed when new homes come forward piecemeal).

2.2.9. Finally, by way of context, it is important to acknowledge:

- Buckinghamshire is not an island but rather functions as part of a wider sub-region, or even a series of sub-regions. Sharing housing needs across a sub-region is often a key issue necessitating cooperation between local authorities, but there are also wide-ranging further strategic issues and opportunities to explore, including around transport and wider strategic infrastructure. The Local Plan must carefully account for cross-boundary and larger-than-local issues, and effective cooperation a key soundness consideration, despite there no longer being a legal 'Duty to Cooperate'. As part of this, the NPPF notably states: *"Plans come forward at different times, and there may be a degree of uncertainty about the future direction of relevant development plans or the plans of infrastructure providers. In such circumstances... authorities and inspectors will need to come to an informed decision on the basis of available information, rather than waiting for a full set of evidence from other authorities."*
- This discussion has focused on providing for LHN, but there are also wider development needs, most notably in respect of employment land and the accommodation needs of Gypsies and Travellers. Providing for employment land needs is overall less challenging than providing for housing needs, particularly because there is a very large site that is likely able to provide for a large proportion of needs over the plan period (Wescott Venture Park), but providing for Gypsy and Traveller accommodation needs is very challenging, as discussed further below.

2.3. The plan period

2.3.1. The duration of the Local Plan is 21 years from 1st April 2024 to 1st April 2045. This reflects paragraph 22 of the National Planning Policy Framework (NPPF), which states: *"Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities..."*

2.3.2. Further points to note are:

- Monitoring data is available for 24/25 that shows delivery of 1,577 homes in this period, i.e. a level of delivery significantly below LHN, which therefore adds to the challenge of providing for LHN over the plan period. In turn, consideration could be given to 'rebasin' the plan period once monitoring data is available for 2025/26.

- In some ways planning to 2045 represents good practice, for example with the NPPF stating: *“Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years).”* However, on the other hand, there is a need to acknowledge the Government’s current Devolution agenda, which will likely mean that a Spatial Development Strategy (SDS) is prepared for a sub-region including Buckinghamshire within the next few years (potentially the Thames Valley from Swindon to Slough), and SDSs will be well placed to direct growth over a long time horizon including with a view to aligning growth and infrastructure.
- Monitoring data correct as of 1st April 2025 shows that 21,680 homes are set to be delivered over the plan period from sites with planning permission or an existing allocation within a local or neighbourhood plan that can be safely rolled forward into the new Local Plan. However, in practice this supply from ‘commitments’ is higher because sites have continued to be granted permission since 1st April 2025, and at a considerable rate recalling that the presumption in favour of sustainable development is in force (also, the introduction of ‘grey belt’ as a new policy designation in 2024 has led to a major uptick in planning applications being submitted and, in turn, decided within the south of Buckinghamshire, which falls within the London Green Belt). This is a constantly evolving situation, with supply from commitments ever-increasing.⁵
- In turn, the aim is to provide for housing supply over-and-above completions and commitments (also a windfall assumption) in order to deliver on the housing requirement over the plan period (whatever that might be set at) and ensure the requirement is delivered year-on-year (recalling the potential for a stepped housing requirement that is lower in the early years of a plan and then commensurately higher in later years, albeit stepped requirements should be avoided as far as possible).
- In particular, the requirement is for specific “deliverable sites” for years 1 to 5 of the plan period (such that there is a 5YHLS); “developable sites or broad locations” for years 6-10; and “where possible” developable sites or broad locations for years 11-15. As well as demonstrating a 5YHLS of deliverable sites at the point of plan adoption (N.B. the 5YHLS calculation involves adding either a 5% or 20% buffer on top of the housing requirement) there is also a need to ensure that the Council can maintain a rolling 5YHLS over the early years of the plan period (ahead of a future supply boost through a new local plan), such that the Local Plan remains up-to-date and the Council is not subject to the presumption in favour of sustainable development.

2.4. The plan area

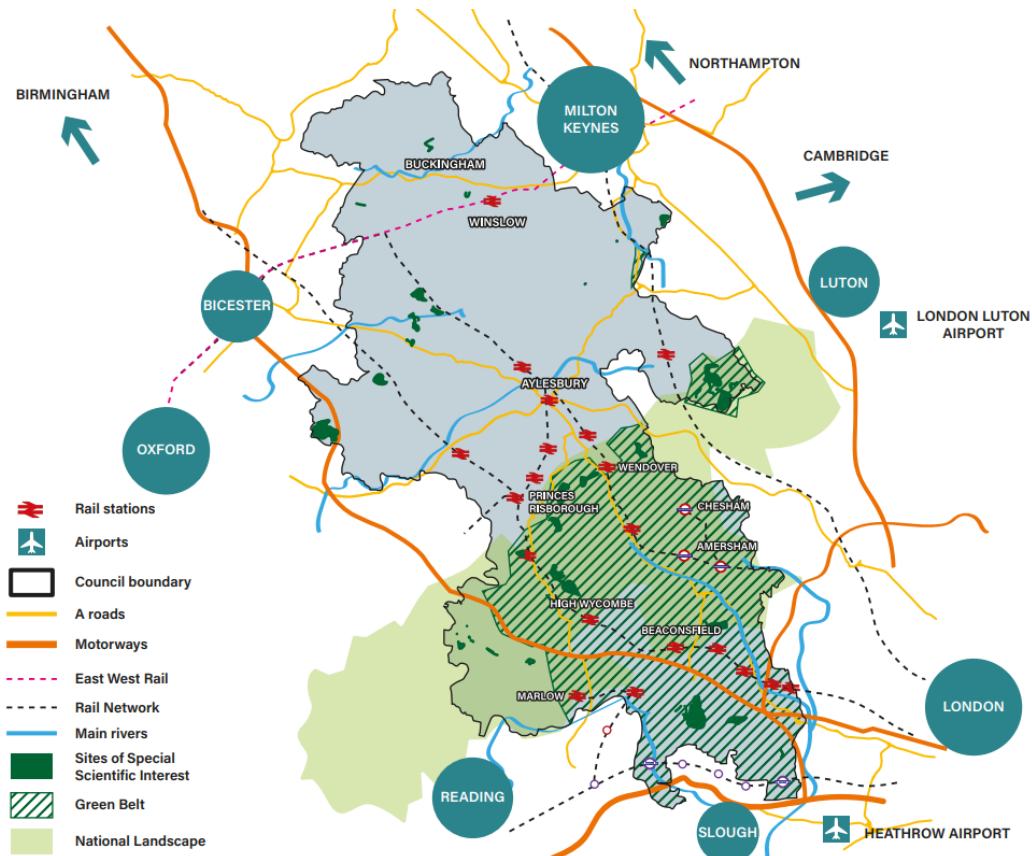
- 2.4.1. Buckinghamshire is a diverse and strategically important part of South East of England. There are a wide range of urban and rural communities, including principal towns, market towns, villages and extensive areas of countryside including parts of the Chilterns National Landscape and the London Green Belt. Buckinghamshire benefits from strong economic links, strategic transport connections and a high-quality natural and historic environment, making it an attractive place to live, work, visit and invest.
- 2.4.2. Buckinghamshire faces a number of significant opportunities and challenges. Its location and connectivity provide substantial potential for sustainable growth, investment and economic development, but there are also constraints to growth including relating to valued landscapes, the London Green Belt, rich biodiversity and historic character.
- 2.4.3. Key issues facing Buckinghamshire include meeting housing needs and improving affordability, supporting economic growth including by improving productivity, delivering infrastructure to support development, improving transport connectivity and accessibility, responding to environmental pressures, protecting and enhancing the natural and historic environment, addressing health inequalities, and responding to the needs of an ageing population. Balancing these pressures is at the heart of the Local Plan.

⁵ There are alternative higher commitments figures that account for permissions since 1st April 2025 and/or sites that are an existing allocation where the proposal now is to support delivery of additional homes.

Location and geography

- 2.4.4. Buckinghamshire occupies a key strategic position within the South East of England and the Thames Valley. The county lies within the Oxford-Cambridge Growth Corridor and forms an important link between London, Oxford, Milton Keynes and Cambridge. Buckinghamshire benefits from strong economic relationships and functional linkages, including with London, Milton Keynes, Northamptonshire and the wider South East.
- 2.4.5. Buckinghamshire is well connected by a network of strategic transport infrastructure, including the M40, M25 and M4 motorways, national rail services and the London underground. The south of Buckinghamshire is in proximity to Heathrow and abuts Slough, which is a hub of economic activity, and the north of Buckinghamshire abuts Milton Keynes, which is a nationally and internationally significant growth area.
- 2.4.6. Figure 2.1 illustrates Buckinghamshire's strategic location, key transport connections and environmental designations. Together, these factors play an important role in shaping the distribution, scale and form of development across the county.

Figure 2.1: Buckinghamshire strategic context



Spatial overview

- 2.4.7. Buckinghamshire stretches from the northwest edge of London, the River Thames and the M25/M4 in the south, via the M40 corridor and the Chilterns to the Vale of Aylesbury and then Milton Keynes and Brackley (Northamptonshire) in the far north. The diversity of the County from north to south is a key characteristic feature.
- 2.4.8. Beginning with the southeast extent Buckinghamshire, this area is associated with the edge of London, the River Colne / Grand Union Canal corridor (including the River Colne Regional Park) and the M25 / M40 / A40 junction. There is excellent rail connectivity from Gerrards Cross, Denham, Langley and Iwer; access to strategic employment areas including Pinewood (Iwer Heath) and nearby at Heathrow; and another factor is the influence of HS2 including the Colne Valley Viaduct.

- 2.4.9. Just to the south of Buckinghamshire is then the M4 corridor including Slough and Maidenhead, with this an important economic growth area noting the proximity of Heathrow. Slough is a tightly bounded urban authority with high development needs, which is an consideration for the Buckinghamshire Local Plan, but there are also constraints to growth in this area, particularly relating to extensive ancient woodland (including internationally important Burnham Beeches) and historic environment designations (including several historic estates, including two that are Grade I listed).
- 2.4.10. To the west is then Marlow, which is an attractive and historic market town associated with a characteristic position between the River Thames and the Chilterns National Landscape. Marlow is associated with the A404 which links the M4 and M40 corridors.
- 2.4.11. Moving to the north is then the Chilterns National Landscape, which is cut through by the M40 corridor and a series of towns and large villages well-linked to London by road and rail, including towns that grew in the 20th Century as part of Metroland. High Wycombe is at the heart of this area, slightly more distant from London and strongly associated with the Chilterns. To the west, north and northeast of High Wycombe is then the high Chilterns including the iconic Chilterns escarpment and the associated small towns of Princes Risborough and Wendover, also Tring nearby in Hertfordshire.
- 2.4.12. The northern half of Buckinghamshire is then primarily associated with the Vale of Aylesbury, stretching between the Chilterns escarpment in the south – where the setting of the Chilterns is a significant constraint – to the Greensand Ridge and the edge of Milton Keynes in the north. Aylesbury is located at the south of this area and is Buckinghamshire's main town having accounted for recent, ongoing, committed and future strategic growth town. Much of the wider Vale is rural and poorly connected in transport terms, but Haddenham is a large village with a train station and other areas are well linked by road, including to Milton Keynes and Oxford. Finally, it is important to note the valued Mid Vale Ridge and associated villages in the central part of this area.
- 2.4.13. Finally, in the far north the edge of Milton Keynes is nationally significant as a potential growth area and, similarly, the village of Winslow must be considered for strategic growth given a new train station on East West Rail (EWR). Similarly, Buckingham is a key growth location given links to Milton Keynes, Oxford and Silverstone on the Northamptonshire border, but is a sensitive historic town without rail connectivity.

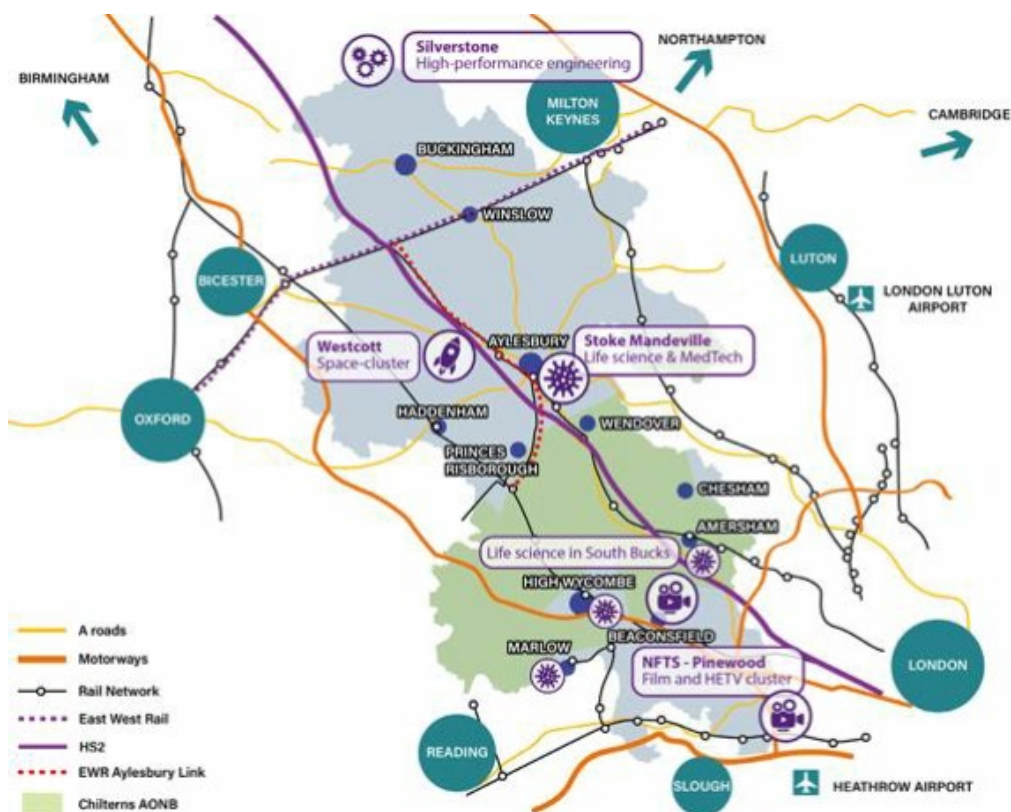
Population and communities

- 2.4.14. Buckinghamshire has a population of approximately 553,000, representing an increase of 9.5% since 2011, which is higher than the national average growth rate of 6.6% over the same period (ONS Census 2021). The south is more densely populated and the north generally more rural and sparsely populated. Population growth has been particularly significant within the north and central planning area (around 10.4%).
- 2.4.15. The principal urban areas are Aylesbury and High Wycombe, which provide significant concentrations of housing, employment, retail, education, leisure and public services. A network of market towns then includes Amersham, Beaconsfield, Buckingham, Chesham, Marlow, Princes Risborough, Wendover and Winslow. The main settlements contribute to Buckinghamshire's character, historic identity and sense of place.
- 2.4.16. Settlement patterns vary across the county. The south of Buckinghamshire generally has stronger economic and commuting relationships with London and surrounding urban areas, whilst the north is more rural in character, with larger areas of open countryside. There are significant implications for connectivity, accessibility and housing demand.
- 2.4.17. Buckinghamshire's population is both growing and ageing, with implications for housing, healthcare, infrastructure, employment and community facilities. Between 2011 and 2021 Census periods the number of residents aged over 65 increased by 23.2% compared to an increase of 6.4% in people aged 15 to 64 years.

- 2.4.18. Buckinghamshire is one of the least deprived local authorities in England but also contains some wards that are in the top 10% most deprived nationally, particularly in Aylesbury and High Wycombe, but there are also pockets of deprivation elsewhere including Burnham, Chesham, and Denham. This deprivation is associated with a higher number of health issues and poorer life outcomes, with life expectancy in the most deprived areas around 5.4 years lower than the most affluent. Established regeneration strategies for Aylesbury, High Wycombe and Chesham form part of the response to these issues, and there is a key wider focus on improving town centres.
- 2.4.19. Another key focus is ensuring that younger households and working-age residents are able to access suitable housing, employment opportunities and services. This is crucial for the economy, and evidence notably indicates that between the recent census periods Buckinghamshire saw a rise of approximately 6,800 adult children living with their parents to a total of 43,400 (the Local Housing Needs Assessment, LHNA, 2025). The LHNA estimates around 19,000 potential households living within existing households.
- 2.4.20. Rural communities are also a key focus. These communities contribute positively to Buckinghamshire's character and identity, and there is a thriving rural economy, but some rural settlements face challenges relating to accessibility, connectivity, housing needs and viability/vitality. Numerous settlements have seen little growth over decades. In rural areas balancing the need for homes, jobs and infrastructure with the protection of Buckinghamshire environment, heritage and landscape character is a key challenge.

Economy and employment

- 2.4.21. Buckinghamshire has a strong and diverse economy, benefiting from its strategic location. There is approximately £19.2 billion in economic output annually and there are around 285,000 jobs across more than 31,000 businesses, around 98% of which are small and medium-sized enterprises (Buckinghamshire Economic Growth Plan, 2025).
- 2.4.22. There are strengths in sectors aligned with the national Industrial Strategy, including advanced manufacturing, film and creative industries, space technologies, life sciences and digital industries. Nationally significant assets include Pinewood Studios, Westcott Venture Park, Silverstone Park, Woodlands Enterprise Zone and Stoke Mandeville Hospital, all supporting innovation, investment and highly skilled employment.
- 2.4.23. However, Buckinghamshire also faces a number of economic challenges, particularly relating to productivity. Output per worker was previously above the national average prior to 2011 but has since declined to broadly align with it and continues to decline. Wider and related challenges include insufficient modern employment premises, affordability pressures, skills shortages, transport constraints and competition.
- 2.4.24. Figure 2.2 illustrates the spatial distribution of Buckinghamshire's key economic clusters and their relationship to strategic transport infrastructure and surrounding economic centres. This highlights Buckinghamshire's role as part of a wider interconnected economic geography and the importance of connectivity in supporting economic growth.
- 2.4.25. Buckinghamshire also experiences significant levels of out-commuting, reflecting its strong economic links to London and the wider South East. This indicates opportunities to strengthen local employment provision to support a more balanced local economy and reduced commuting leading to reduced congestion on the transport network.
- 2.4.26. Supporting sustainable economic growth, improving productivity and creating high-quality employment opportunities are therefore important priorities for the Local Plan. Responding to these challenges requires a coordinated approach which supports inward investment, innovation and business growth, whilst ensuring that economic development is aligned with infrastructure capacity and environmental objectives. The vision is to improve productivity and cement Buckinghamshire's reputation as a leader in creative industries, space, high performance technology sectors, including with a focus on: a) growing high value sectors; b) enhancing place and infrastructure; c) investing in people and skills; d) fostering innovation; and e) supporting partnerships and collaboration.

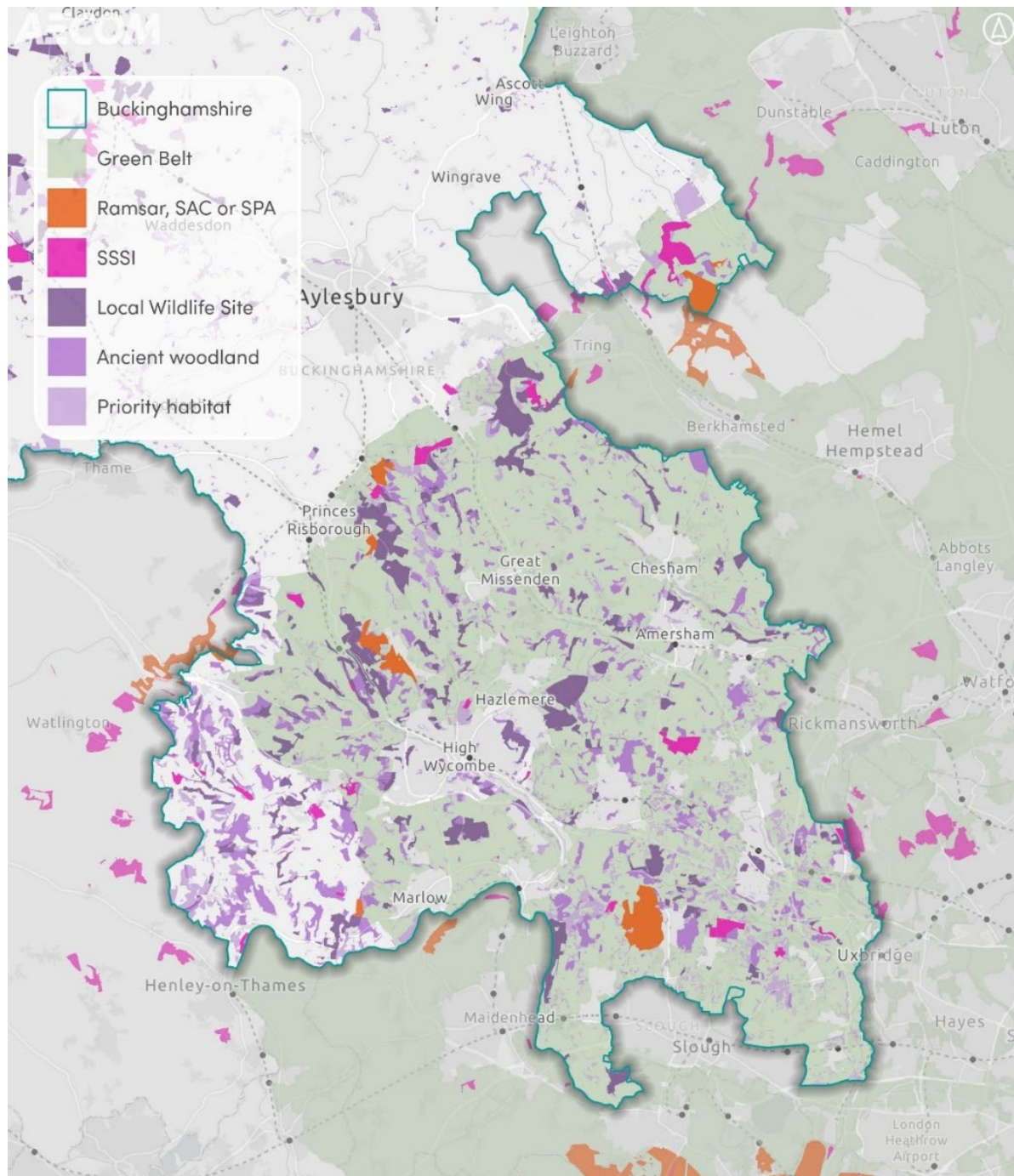
Figure 2.2: Buckinghamshire innovation clusters and sector specialisms**Figure 2.3: Workday migration and commuting patterns in Buckinghamshire**

Environment and landscape

- 2.4.27. Buckinghamshire contains a high-quality natural and historic environment, including nationally and internationally important landscapes, biodiversity assets and heritage features. Large parts of the county are rural in character and include extensive countryside, agricultural land, woodland, chalk streams and historic settlements.
- 2.4.28. Approximately 32% of Buckinghamshire is designated as Metropolitan Green Belt and around 27% falls within the Chilterns National Landscape. The Green Belt plays an important role in preventing urban sprawl, safeguarding the countryside and maintaining the separation and identity of settlements. The Chilterns National Landscape is hugely significant including on account of its accessibility from London.

- 2.4.29. There are many internationally, nationally and locally designated environmental assets, with the 'jewels in the crown' being a network of internationally designated Special Areas of Conservation (SACs), most notably the Chilterns Beechwoods (a network of woodlands stretching across the Chilterns) and Burnham Beeches in the south. These SACs require financial contributions from developers to offset the recreational impact of development and provision of Suitable Alternative Natural Green space (SANG).
- 2.4.30. With regards to wider environmental designations, what is very apparent is a stark difference in the density of designations between the north and the south of Buckinghamshire (e.g. see Figure 2.4). However, there are also a range of environmental sensitivities across the north of Buckinghamshire.

Figure 2.4: Biodiversity designations and select other assets in the south of Buckinghamshire



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- 2.4.31. Buckinghamshire's water environment is also highly valued and sensitive, including its network nationally important chalk streams. These assets are sensitive to development pressures, water stress, pollution and changes in environmental conditions.
- 2.4.32. Environmental assets taken together play a fundamental role in shaping local character and identity. They contribute significantly to biodiversity, health and wellbeing, environmental quality and the attractiveness of places, whilst also influencing the location, scale and form of development that can be accommodated.
- 2.4.33. There are a range of environmental pressures and these risk being exacerbated by housing and economic growth and associated infrastructure delivery. Climate change is a key contextual consideration, which serves to heighten concerns including around biodiversity loss, water resource availability (for people and the environment), water quality and flood risk. Water availability/supply and wastewater treatment capacity are key issues that are high on the agenda across the South of England at the current time.
- 2.4.34. The Local Plan aims to deliver on the Bucks Climate Challenge, which has its core a target to achieve net zero carbon emissions by 2050. Data shows that 51% of emissions in Buckinghamshire are transport related, hence the Local Plan must support sustainable travel choices, ultra-low or zero emission vehicles and digital connectivity. The Local Plan must also support Local Nature Recovery Strategy and deliver on a Green Infrastructure Strategy aimed at ensuring climate adaptation and resilience.
- 2.4.35. Finally, with regards to flood risk, whilst this is widespread and set to worsen there is typically good potential to avoid flood risk zones, including accounting for surface water flood risk. However, flood risk is a key challenge affecting two of Buckinghamshire's three largest towns, namely High Wycombe and Chesham, reflecting their association with a distinct Chilterns topography and geology. Development can come forward alongside Sustainable Drainage Systems (SuDS) to ensure that offsite flood risk is not worsened (or a betterment is achieved), but there is nonetheless a need to consider the cumulative effects of growth, and take a catchment-scale approach as far as possible.

Heritage

- 2.4.36. Within Buckinghamshire there are 180 conservation areas, 41 parks and gardens on the national register and 5,877 listed buildings / structures, of which: 135 are Grade I, 299 are Grade II*, 5,443 are Grade II. There are also 121 scheduled monuments.
- 2.4.37. These assets are highly spatially correlated with historic patterns of settlement, transport and land use; for example, there is a high concentration of historic estates in the south of Buckinghamshire reflecting of links to London. There are also extensive areas of archaeological sensitivity; for examples, concentrations of scheduled monuments along the Ridgeway (described as Britain's oldest road), and there is an established and growing network of locally designated assets (see a helpful map of nationally and locally listed assets [here](#)). The Buckinghamshire [Historic Towns Study](#) is another key resource.
- 2.4.38. Buckinghamshire's heritage might be described as a blend of elements from the pre-historic and Roman periods, the Anglo-Saxon period when Buckinghamshire was a key defensive county and more modern periods with heritage relating to agriculture, industry, landed estates, Metroland and literary connections including relating to the Chiltern Hills.
- 2.4.39. Some of the most renowned assets include Waddesdon Manor, Cliveden, Chequers, West Wycombe Park and Hughenden Manor. Buckinghamshire is also known as "Roald Dahl country," because the famous writer lived in Great Missenden, and Marlow has deep literary routes including as home to poets Mary and Percy Shelley.
- 2.4.40. Buckinghamshire played a crucial role during WWII, with intelligence operations at locations like Bletchley Park and many RAF bases across the county. For example, RAF Halton (now programmed for closure) contains many historical military buildings not least some of the first RAF barrack blocks built in the country.

- 2.4.41. Buckinghamshire was traditionally more of a rural county focussed on farming cherry orchards, management of woodlands (coppices / pollards and standard trees, e.g. for shipbuilding) and other agricultural enterprises. However, there was also traditional industry such as chair making in High Wycombe and the boot and leather industry in Chesham. Historic farmsteads are also widespread, and the network woodlands – most notably beech woodlands but also former royal hunting forests such as Whaddon Chase; also some areas of heathland – is a key heritage asset. The Chiltern Open Air Museum at Chalfont St Giles (itself of renowned heritage value, including as the home of Milton's Cottage associated with Paradise Lost) provides a glimpse into the past.

Transport, connectivity and infrastructure

- 2.4.42. Buckinghamshire benefits from strong strategic transport connections, including national rail services, the motorway network and proximity to London Heathrow and London Luton airports. Buckinghamshire's transport infrastructure supports economic activity, commuting patterns and access to employment, services and education, whilst providing nationally significant connections for those passing through on longer journeys.
- 2.4.43. Major infrastructure projects are also shaping future connectivity across Buckinghamshire. High Speed 2 (HS2) passes through Buckinghamshire whilst East West Rail (EWR) will improve east-west connections between Oxford, Milton Keynes and surrounding areas, including with a new station at Winslow. There is also an aspiration for an EWR extension to Aylesbury to improve north-south connectivity.

Figure 2.5: Strategic road and rail connections in Buckinghamshire



- 2.4.44. Despite these strengths, parts of Buckinghamshire's transport network are operating at or close to capacity, particularly around key towns, strategic routes and major transport corridors. Modelling indicates that traffic volumes are likely to increase over the plan period, placing additional pressure on transport infrastructure and connectivity.
- 2.4.45. Whilst Buckinghamshire benefits from strong north-south transport connections, east-west connectivity remains more limited in some areas. Public transport accessibility is also more constrained in some areas, particularly in the north, where reliance on private vehicle travel remains high. These factors can affect access to employment, services and opportunities, whilst contributing to congestion and wider accessibility challenges.

- 2.4.46. Continued investment in transport infrastructure, public transport, active travel and digital connectivity is therefore needed to support sustainable growth. Bus connectivity is one area where there is a major opportunity to target growth so as to address issues (e.g. some routes struggle to remain viable) and realise opportunities (e.g. 'fast and frequent' services); and this is also the case for strategic upgrades to cycling infrastructure, informed by the Local Cycling and Walking Infrastructure Plan (LCWIP).
- 2.4.47. Buckinghamshire also faces infrastructure pressures, including in terms of healthcare, education, utilities, wastewater treatment, green infrastructure and community services. Local plans are the means of ensuring that new development is supported by the timely delivery of infrastructure, but this is also a key challenge for any local plan.

Housing and affordability

- 2.4.48. Buckinghamshire experiences significant housing affordability pressures, reflecting its attractive environment, strong economy and connectivity to London and the wider South East. House prices remain significantly above the national average, with average house prices estimated at approximately £479,000 in April 2026 (ONS data, 2026). Around 71% of residents own their homes either outright or with a mortgage (Census 2021).
- 2.4.49. In 2024, Buckinghamshire's affordability ratio was 11.6, which means that house prices are over eleven times average salaries paid by jobs in Buckinghamshire, and this figure was as low as 5 in 1998. This creates particular challenges for younger people, first-time buyers, younger families, key workers and lower-income households.
- 2.4.50. Affordability issues translate into a very high need for affordable housing, including social rented housing, and there is also a very high need for specialist housing and accommodation. Ensuring that homes meet the needs of different groups within the community is therefore an important consideration throughout the plan period.

Health and wellbeing

- 2.4.51. Although Buckinghamshire overall has better health outcomes than much of England, these benefits are not experienced equally, with poorer outcomes amongst vulnerable and deprived groups. In turn, the Local Plan must deliver natural and built environments that support both physical and mental health, including: quality housing; well-designed spaces; accessible greenspaces; active travel infrastructure; facilities for recreation and education; employment; and communities supportive of inclusion and social connection.
- 2.4.52. Alongside prevention, it is also essential to ensure sufficient healthcare infrastructure, particularly as some existing facilities face capacity and ageing challenges. Future development must therefore support accessible healthcare services and provide affordable accommodation for key workers to sustain the healthcare workforce. However, it can be a challenge to growth with NHS strategy for healthcare.

2.5. Plan objectives

- 2.5.1. The plan objectives are established in order to guide plan-making but are also of importance for the SA process as they guide the definition of reasonable alternatives.
- 2.5.2. The plan objectives are summarised in the plan document as follows: *"Together, the objectives seek to support sustainable growth, protect and enhance Buckinghamshire's valued natural and historic environment, address climate change, improve health and wellbeing, strengthen the economy and ensure that development is supported by the infrastructure, services and facilities required by existing and future communities."*
- 2.5.3. The plan objectives are as follows (slightly abridged):
- Conserve and enhance Buckinghamshire's valued natural, historic, and built **environments**, to ensure they are protected from inappropriate development.
 - Sustain the predominantly rural character of Buckinghamshire.

- Protect valued landscapes, including the Chilterns National Landscape, and open countryside in the Green Belt from harmful or inappropriate development.
- Conserve and enhance special places for nature and create an enhanced connected county-wide network of green and blue infrastructure which maximises opportunities for biodiversity net gain through the creation of new priority habitats, (having regard to the Local Nature Recovery Strategy).
- Improve water quality, including with a focus on globally rare chalk streams.
- Respect historic assets and facilitate the enhancement of their setting.
- Support regeneration of the built environment.
- Ensure the delivery of **sustainable development**, mitigating climate change and adapting to the impacts on Buckinghamshire's environment.
 - Support the transition to a net zero carbon Buckinghamshire by 2050.
 - Direct growth to sustainable locations in terms of transport connections / services.
 - Design new development to be resilient to climate extremes and manage flood risk.
 - Increase the supply of renewable/low-carbon energy and provide supporting infrastructure such as electric vehicle charging points and hydrogen fuelling.
 - Meet standards of insulation, water, and energy efficiency in buildings.
 - Create locally liveable neighbourhoods in new development and regenerated areas.
 - Provide attractive and viable travel choices other than the private car.
 - Ensure development is designed to support efficient and sustainable waste and recycling systems, including the provision of appropriate space in developments.
- Meet **housing needs** for all of the different groups in the community, including affordable housing, and provide increased tenure choice.
 - Provide a range of housing to meet local needs for market, affordable, accessible and specialist needs (such as lifetime homes) while recognising the diversity in the character and context of our urban, suburban and rural areas.
 - Enable the delivery of homes for key workers, people with local connections, and those seeking self- and custom-build opportunities.
 - Ensure new housing is of high-quality design, low-carbon and digitally enabled and in keeping with its surroundings.
- Create **great places** to live and work that function well, and are welcoming, safe, and accessible to all.
 - Take inspiration from the valued and unique characteristics of Buckinghamshire to deliver high quality design that reinforces Buckinghamshire's distinctiveness, while being innovative in construction and design where appropriate.
 - Create neighbourhoods where goods and services are available locally, are supportive of healthy lifestyles and social connectedness, easy to move through and easy to understand.
 - Provide sufficient and well-integrated parking.
 - Ensure development meets energy efficiency standards and design that promotes natural surveillance to improve safety.
 - Secure a safe, accessible, inclusive, and robust network of spaces across Buckinghamshire for recreation, play, biodiversity, and water infrastructure.
- Support communities with their health, social and cultural **wellbeing**. We aim to protect and improve health care facilities and access to them for residents.
 - Create accessible and inclusive places that support active lifestyles and good health through people-friendly streets, open and green spaces, and play areas.

- Work with health partners to ensure appropriate healthcare facilities are available and accessible, including the delivery of new provision where required.
- Provide new or enhanced sport, leisure and cultural facilities where needed.
- Improve air quality across Buckinghamshire.
- Ensure the right **infrastructure** required to support communities is provided in the right place and at the right time, and make best use of existing infrastructure.
 - Facilitate wider connectivity across Buckinghamshire and beyond.
 - Ensure improved local connections within and between settlements.
 - Provide and protect appropriate social infrastructure including for health, education, skills training, sports, recreation and other community facilities.
 - Provide and connect green and blue infrastructure to enhance the landscape and biodiversity.
 - Provide flood risk mitigation and sustainable drainage solutions, negotiating with utility companies for adequate sewerage and wastewater infrastructure.
- Grow and diversify **the economy** by delivering the right employment opportunities in the right places, supporting economic growth, productivity, regenerating towns, and villages, and enabling delivery of education, training and skills.
 - Enhance our economic assets by supporting Enterprise Zones, strategic and key employment areas.
 - Support and enhance Buckinghamshire's specialisms and strengths, including through appropriate skills and education provision.
 - Designate employment spaces that support a diverse range of commercial activity, from high quality offices to local workshops.
 - Seek opportunities to link residential and commercial development.
 - Locate new employment spaces close to good transport connections.
 - Repurpose and regenerate town and village centres for a diverse range of uses.
 - Support a sustainable rural economy including sustainable agriculture and farm diversification, and safeguard food security.
- Improve **connectivity**, including working in partnership across boundaries, by securing new transport infrastructure, upgrading infrastructure and improving digital connectivity.
 - Maximise the opportunities presented by large-scale strategic transport schemes to focus the location of growth and encourage inward investment in Buckinghamshire.
 - Create safe and attractive walking, wheeling and cycling routes as the natural choices for shorter journeys, or as part of a longer journey, for those who are able.
 - Diversify, extend, and enhance public transport provision, including bus services and new types of transport to enable people to undertake car-free journeys.
 - Create safe and accessible interchanges, e.g. public transport to cycling.
 - Facilitate effective transport solutions for all users.
 - Direct freight to the most appropriate routes and plan for sustainable freight activity and first mile / last mile solutions, in accordance with the Local Transport Plan.
 - Support the provision of digital infrastructure, particularly in the most remote areas.
 - Deliver low or zero carbon fuel infrastructure including charging infrastructure.

3. The SA scope

3.1. Introduction

- 3.1.1. The scope of the SA refers to the breadth of sustainability issues and objectives that are taken into account when appraising the plan and reasonable alternatives. It does not refer to the scope of the plan or the scope of reasonable alternatives.
- 3.1.2. The aim here is to introduce the reader to the *broad scope* of the SA, and particularly the SA framework, which is a headline list of sustainability topics/objectives under which appraisal work can be undertaken, i.e. appraisal of the plan and reasonable alternatives.
- 3.1.3. This section does not aim to define the scope of the SA comprehensively, recognising that there is a need for flexibility to respond to the nature of the emerging plan and reasonable alternatives, and latest evidence. The SA scope is further discussed throughout this report, i.e. throughout the report there is discussion of key aspects of the sustainability context and baseline and key issues / opportunities. This allows for a targeted discussion, and avoids the need for a generic discussion of sustainability issues (etc.) that is poorly targeted in the context of the plan and alternatives.

3.2. Consultation on the scope

- 3.2.1. The Regulations require that: *“When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e. the SA Report], the responsible authority shall consult the consultation bodies”*. In England, the consultation bodies are the Environment Agency, Historic England and Natural England. As such, these authorities were formally consulted on the SA scope in 2023.
- 3.2.2. Consultation responses were received from all three statutory bodies, and the Scoping Report was updated and published on the Local Plan website in 2023.

3.3. The SA framework

- 3.3.1. The primary outcome of scoping is a list of topics/objectives that can then be utilised as a ‘framework’ under which to structure appraisal work. The aim is to ensure that appraisal is well-targeted, concise and engaging. Table 3.1 presents the SA framework.

Table 3.1: The SA framework

SA topic	SA objective
Accessibility	Support accessibility to community infrastructure, including by delivering infrastructure enhancements, including strategic infrastructure that benefits existing as well as new communities (‘planning gain’).
Air quality	Take steps to locate, design and deliver new development so as to avoid worsening air pollution and support the achievement of air quality objectives, including within air quality management areas (AQMA).
Biodiversity	Conserve and enhance designated sites, in accordance with their significance and in line with established good practice. Take a strategic, landscape-scale approach to biodiversity, focused on ecological connectivity / networks and climate change resilience. Ensure accordance with the mitigation hierarchy (avoid, mitigate, compensate).

Climate change adaptation	Plan strategically for flood risk, mindful of climate change scenarios, and also ensure resilience to wider climate change impacts, including overheating risk. Linked to biodiversity objectives, support restoration of natural processes and the avoid actions that further constrain the natural environment's ability to respond to climate change.
Climate change mitigation	Contribute to reductions in per capita emissions from both transport and the built environment, in line with the Government's targets for net zero. Seek to realise opportunities for supporting larger scale renewable energy schemes and also strategic carbon sequestration (e.g. new woodlands).
Communities and health	In addition to ensuring good accessibility to community infrastructure, seek to realise wide-ranging other communities and health objectives (for example in terms of access to green infrastructure, supporting vibrant town centres, and addressing relative deprivation and inequalities).
Economy and employment	Meet the full range of employment land needs and more widely reflect the objectives set out in the NPPF, including the headline objective of supporting economic growth and productivity. Build on local strengths, counter any weaknesses and address the challenges of the future, including guided by strategy/policy defined at key functional scales.
Historic environment	Conserve and enhance the historic environment, with a focus on designated assets, but also non-designated assets and historic character. Consider links to landscape, place-making and other objectives.
Housing	Meet objectively assessed needs for housing and wider accommodation as far as possible. Deliver affordable housing and specialist housing / accommodation to meet needs, as far as possible, and ensure an appropriate housing mix in terms of size, type and tenure.
Landscape	Protect and enhance the character, quality and setting of valued landscapes at all scales (most notably the Chilterns AONB). Recognise links to wider objectives (e.g. biodiversity, heritage). Design development with landscape as a key factor, including by taking a strategic approach to high quality green infrastructure linking to the wider landscape.
Soils and resources	Ensure efficient use of land including a focus on avoiding the loss of best and most versatile agricultural land as far as possible. Support minerals and waste planning and seek to reflect circular economy principles.
Transport	Support the achievement of modal shift from private car use to public and active transport, including through the location and design of development. Support the Local Transport Plan, for example in respect of strategic transport infrastructure upgrades, addressing congestion hotspots (and, in turn, supporting bus services) and future mobility.
Water	Direct growth to minimise pressure on water resources and water quality, including accounting for wastewater treatment capacity and water quality hotspot areas (catchments and water resource zones). Realise opportunities for growth to support new / upgraded infrastructure.

Part 1: Work to date

4. Introducing Part 1

4.1. Overview

- 4.1.1. As discussed work has been underway for several years and two SA reports have been published to date, namely an Interim SA Report in 2025 and an SA Note in early 2026. Past work fed into work to define, appraise and feed-back on **reasonable alternatives** in spring / early summer 2026, and it is this work that is a focus of this section.

4.2. Reasonable alternatives in relation to what?

- 4.2.1. The requirement is to examine reasonable alternatives (RAs) taking account of “the objectives and geographical scope of the plan”, which suggests a need to focus on the **spatial strategy**, i.e. providing for a **supply** of land, including by allocating **sites**, to provide for housing needs (**LHN**) alongside delivering-on wider plan objectives.
- 4.2.2. Establishing a spatial strategy is invariably a central objective of any local plan, and the Buckinghamshire Local Plan is no exception, e.g. this is very apparent from consultation and engagement work to date. The plan also covers development management (DM) policies, but it is clear that spatial strategy / site selection / supply is the central matter.
- 4.2.3. Alternatives in respect of spatial strategy / site selection / supply can be referred to as ‘**growth scenarios**’, and can also be thought of as **alternative key diagrams**.
- 4.2.4. A focus on RAs in the form of ‘growth scenarios’ ensures a focus on mutually exclusive alternatives that go to the very heart of the local plan and, in turn, ensures a meaningful and engaging appraisal in support of effective consultation and debate.⁶

What about site options?

- 4.2.5. Individual site options invariably generate a high degree of interest, but they are not RAs where the objective a local plan is to allocate a *package* of sites. Nonetheless, consideration is naturally given to the merits of individual site options as part of the process of establishing growth scenarios – see Sections 5.3 and 5.4.

5. Defining growth scenarios

5.1. Introduction

- 5.1.1. The aim here is to discuss the process that led to the definition of growth scenarios.

Structure of this section

- 5.1.2. This section explains a process to define growth scenarios as follows:
- **Section 5.2** – explores **strategic factors** that are a ‘top down’ input.
 - **Section 5.3** – introduces the **site options** that are ‘bottom up’ input.
 - **Section 5.4** – combines **top down and bottom up** factors
 - **Section 5.5** – concludes on **growth scenarios**.

⁶ SA must only focus on significant effects, and a focus on reasonable alternative (RA) ‘growth scenarios’ guarantees a focus on meaningfully differential significant effects thereby negating to ‘screen’ what should and should not be a focus of work to explore RAs. A further consideration is that the regulatory requirement, when read at face value, suggests a need to appraise and consult upon alternative plans (specifically, the requirement is to appraise and consult upon: “... *the plan and reasonable alternatives*”). Appraising alternative local plans is patently unachievable but a focus on RA growth scenarios represents the next best thing. Finally, in respect of RAs, it is important to note that appraising a draft proposal versus the ‘do nothing’ option does not equate to an appraisal of RAs, because ‘do nothing’ is the baseline and significant effects are defined as effects *on the baseline*.

A note on limitations

- 5.1.3. The aim here is to describe the *process* that led to the definition of reasonable alternatives (growth scenarios) 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...*” [emphasis added].

5.2. Strategic factors

Introduction

- 5.2.1. The aim here is to explore strategic issues, opportunities and options with a bearing on the definition of growth scenarios. Specifically, this section of the report explores:
- Quantum – *how many* new homes are needed (regardless of capacity)?
 - Broad spatial strategy – broadly where is more/less suited to growth; also, what growth typologies are supported, e.g. large ('strategic') sites versus smaller sites?

Quantum

- 5.2.2. This section recaps the Local Housing Need (LHN) figure for the plan area, before exploring *high-level* arguments for a housing requirement set above or below LHN.

N.B. this section focuses on housing but there is also brief discussion of **employment land** need and the need for **Gypsy and Traveller pitches**.

Background

- 5.2.3. A central tenet of local plan-making is the need to **A)** objectively establish housing needs ('policy-off'); and then **B)** develop a policy response to those needs ('policy-on'). The Planning Practice Guidance (PPG) explains:

“Housing need is an unconstrained assessment of the number of homes needed in an area. Assessing housing need is the first step in the process... It should be undertaken separately from... establishing a housing requirement figure...”

- 5.2.4. With regard to (A), the NPPF states that local housing need (LHN) should be established via an assessment “conducted using the standard method”.
- 5.2.5. With regard to (B), most local authorities respond to LHN by setting a housing requirement that equates precisely to LHN; however, under certain circumstances it can be appropriate to set a housing requirement that departs from LHN.

Local Housing Need (LHN)

- 5.2.6. As discussed, LHN for Buckinghamshire is 4,344 dpa on the basis of the Government's standard method, which accounts for: A) existing dwelling stock; and B) affordability. This equates to 91,230 homes over the 21 year plan period.

Is it reasonable to explore a housing requirement below LHN?

- 5.2.7. The key context is NPPF paragraph 11, which states:

*“... strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, **unless**: i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits...”* [emphasis added]

- 5.2.8. There has always been the potential to evidence and ultimately justify a housing requirement set below LHN, where it is the case that providing for LHN is not achievable or would not represent sustainable development. However, it has also always been understood that there is high evidential bar that must be reached in order to justify a housing requirement set below LHN ('no stone left unturned'), particularly where there is little or no chance of the 'unmet need' generated being provided for elsewhere. Also, the latest situation is the context of the 2024 NPPF, which arguably somewhat 'raises the bar' that must be reached in order to evidence and ultimately justify LHN. Finally, further context also comes from recent revocation of the Duty to Cooperate, which arguably makes it more challenging to agree provision for unmet need.
- 5.2.9. For Buckinghamshire, consideration has been given to the possibility of a housing requirement set below LHN (e.g. see the growth quanta alternatives appraisal in the Interim SA Report, 2025); however, at the current time growth scenarios that would involve a housing requirement set below LHN are judged 'unreasonable'. In short, whilst constraints to growth are wide ranging there are extensive parts of Buckinghamshire that are relatively unconstrained when viewed in the sub-regional and regional context, notwithstanding transport and accessibility challenges. Water availability/supply and wastewater treatment capacity is also a significant constraint to growth but this is likely more an issue for the phasing of development, as solutions can typically be delivered.
- 5.2.10. Also, a further consideration is that any local plan must only ever commit to a housing requirement that is deliverable, because failing to deliver means that the local plan can be judged out-to-date (such that 'the presumption' applies). Delivering 4,344 homes per annum on average is clearly challenging, particularly because delivering at this rate over the early years of the plan period is impossible (e.g. 1,577 homes were delivered in 2024/35), but with careful planning (spatial strategy / site selection / infrastructure planning) there is the potential for a major step-change in delivery in the later years of the plan period such that 4,344 dpa is delivered on average over the plan period.
- 5.2.11. In **conclusion**, at this point in the process the available evidence – including accounting for work that has been completed in respect of spatial strategy / site selection, as discussed below – leads to a conclusion that growth scenarios that would involve a housing requirement set below LHN can be ruled out as unreasonable.

Is it reasonable to explore a housing requirement above LHN?

- 5.2.12. NPPF para 69 states that local authorities should set a housing requirement:
- "... which shows the extent to which their identified housing need... can be met over the plan period. **The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment.***
- 5.2.13. There is no clear case for a housing requirement set above LHN as a response to 'growth ambitions linked to economic development or infrastructure investment'. However, the matter of 'provision for neighbouring areas' is invariably a consideration for local authorities across the South East of England. Key considerations are as follows:
- Slough – the current Local Plan looks only to 2026 and there has been no consultation on the emerging Local Plan since 2021. The possibility of exporting some unmet need to Buckinghamshire has long been a consideration, given: A) very limited potential for greenfield expansion within the Borough boundary; and B) very close links, indeed, unmet need could potentially be provided for by one or more urban extensions of Slough into Buckinghamshire; and C) the need to support the growth of Slough from a socio-economic perspective. However, it is noted that recent housing delivery averaged 560 dpa over the three years to 2024, which is not all that far short of standard method LHN (820 dpa). The stated intention has been to publish a Local Plan under Regulation 19 in 2026 and then submit by December 2026, but this now looks to be very unlikely. The Borough Council responded at the sites engagement stage (2026) suggesting 5,000 homes unmet need, but the evidential basis for this appears to be quite weak, including as RBWM is also well-linked to Slough:

“We note the sustainability appraisal mentions Slough [“As such, at this stage it seems unlikely that Slough Borough Council will be able to generate sufficient evidence to demonstrate a need to ‘export’ unmet need to Buckinghamshire ahead of the LP4B being finalised.”]. We note this matter will be addressed in the direct meetings between the LPAs and their Members but restate here for consistency Slough is doing all it can to meet its housing target but has an anticipated shortfall of around 5,000 homes. This includes a particular lack of land suitable for delivering family housing.... The details are available in the Councils Annual Monitoring Report, 2016 Consultation on the Call for Sites, and 2021 Proposed Release of Green Belt Sites for Family Housing. These are considered sufficient evidence for the LP4B to positively set out consideration of how and where SBC could export need throughout the Plan’s period.”

- London – the current London Plan generates significant unmet need that has not been provided for, and on 16th July 2026 a Draft London Plan was published that generates *at least* 29,000 homes unmet need *per annum*. Also, it is notable that the housing requirement assigned to London Borough of Hillingdon has increased by 122%, which is more than any other Borough. However, as part of work to prepare the London Plan it is not clear that any evidence has been generated to provide an indication of what if any proportion of London’s unmet need might be provided for in Buckinghamshire.
- Three Rivers – the Council recently sought to publish a Local Plan that would generate significant unmet need, but the Secretary of State intervened to require that additional allocations are added in order to boost supply and, in turn, the housing requirement. However, the housing requirement would still only be set at around 85% of LHN.
- Other authorities – all other neighbouring authorities were reviewed in the Interim SA Report (2025), but that analysis need not be repeated here. There is limited or low risk of unmet need, although RBWM is potentially of note as a Green Belt authority where a standard method LHN figure of 1,449 dpa does not compare favourably to recent delivery averaging 487 dpa. However, even if there were any risk of unmet need it is difficult to envisage a strong argument for this flowing in the direction of Buckinghamshire, with a more likely direction westwards along the M4 corridor.

- 5.2.14. Overall, the bullet points above serve to demonstrate that whilst unmet need is not a ‘clear and present’ issue for the Buckinghamshire Local Plan, it is nonetheless a significant factor for the purposes of defining reasonable growth scenarios. This is notwithstanding: A) transferring unmet need from one local authority to another is very challenging in the absence of a sub-regional plan or a legal duty to cooperate, and given differing local plan timescales; and B) future local plans under Local Government Review (LGR) and Devolution will be relatively well placed to deal with unmet need.
- 5.2.15. One other high level consideration, in respect of possible scenarios involving a housing requirement set above LHN, is affordable housing need, given that the PPG states: *“An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.”* Affordable housing is almost entirely delivered by market led housing schemes, and the Buckinghamshire LHNA 2026 identifies a need for 34,100 affordable homes to 2045, which equates to almost 40% of LHN. Also, the tenure mix should involve 63% social rent, which requires greatest subsidy. At unconstrained greenfield sites in the south of Buckinghamshire it will often be possible to deliver affordable housing at a rate of 40% and with a tenure mix weighted towards social rented housing, but overall there is no realistic potential to provide for affordable housing needs in full (even accounting for the possibility of improved market conditions in the future), particularly on the assumption that the spatial strategy will not focus on greenfield sites in the south. As such, there is a case to be made for a housing requirement set above LHN in order to provide for affordable housing needs. However, this is not a straightforward equation.
- 5.2.16. In **conclusion**, there is a reasonable need to define, appraise and consult upon one or more growth scenarios that would involve a housing requirement set above LHN. This was the view taken in 2025 (see the Interim SA Report) and this view remains unchanged at the current time, in light of subsequent work completed to explore supply options (as discussed below), indeed the strategic case has increased (unmet need).

Conclusion on housing quanta options

- 5.2.17. Whilst attention naturally focuses on growth scenarios that would enable the housing requirement to be set at LHN, there is also a need to explore higher growth.
- 5.2.18. The matter of precise growth quanta figures to reflect across the growth scenarios is returned to below following consideration of spatial strategy and site / supply options.

Box 5.1: A note on employment land need

The Employment Land Review (ELR) identifies an overall need for 219.4 ha of new employment land to 2045, comprising of 33.5 ha for office, research and development uses and 185.8 ha for industrial, warehousing and distribution uses. This figure then reduces to approximately 100 ha, once existing commitments are factored in. Employment need figures are based on modelling assumptions and also assumptions regarding developable areas within sites, but overall there is no clear basis for questioning the headline need figures set out above.

The ELR also identified: 37 Key Employment Areas; demand for modern industrial, logistics and research space; continued pressures from office to residential permitted development; growing demand for flexible SME premises; increasing market interest in modern economy uses such as data centres; and the importance of maintaining a flexible portfolio of employment sites.

Providing for the total headline quantitative figure is relatively straightforward (as discussed below; in short the proposal is to identify new allocations to deliver around 147 ha). However, there are also wide-ranging detailed qualitative considerations in respect of the types of employment land that are supported in specific parts of Buckinghamshire. As part of this, considerations include: A) much of the existing committed pipeline of new supply is in the north of Buckinghamshire; and B) Milton Keynes generates unmet need in respect of warehousing and distribution uses, but its neighbouring authorities located along the M1 corridor might be better positioned to provide for this.

A final consideration is data centres, which are recognised as critical infrastructure. The Council's evidence base, including the Modern Economy Study, identifies Buckinghamshire as a suitable and attractive location for data centre development, particularly within the Slough–Hayes availability zone, and recommends that the Local Plan should provide a clear policy framework. However, the capacity needed in Bucks is not quantified, such that it is difficult to select sites for allocation through the Local Plan (there are numerous available sites). There are also wide ranging challenges with delivering data centres, which would need to factor into site selection, including electricity and water demand and landscape impacts. In the south of Buckinghamshire there is a need for a strategic approach to planning for growth, including potential datacentres, given a fragile Green Belt and strategic community and green/blue infrastructure issues and opportunities.

Box 5.2: A note on Gypsy and Traveller accommodation need

The figures are stark, with a need for 516 pitches in the first 10 years of the plan, plus a further need to 2045, although it should be noted that this need includes households currently occupying unauthorised pitches. This is in the context of there currently being 423 authorised pitches in Buckinghamshire. There is also a need for 30 plots for Travelling Showpeople.

Providing for Gypsy and Traveller accommodation needs is a major issue for Local Plans; for example, the Maidstone Local Plan (2024) generates in excess of 500 pitches unmet need and the follow-on local plan tasked with providing for these needs was recently withdrawn. Similarly, the RBWM Local Plan was adopted on the assumption that unmet needs would be met through a follow-on plan, but that plan has not progressed from an Issues and Options consultation in 2019.

A recent blog by the RTPI titled “*Kicking the can down the road: How forward planning has (on the whole) failed Gypsy and Traveller communities*” explains:

“Of the 100 local planning authorities where information was available, 64% had failed to allocate sites as part of the development plan process despite 29 years of government policy [requiring this].”

Broad spatial strategy

- 5.2.19. A key opportunity to explore broad spatial strategy issues and options was the Draft Plan consultation stage in 2025, with the Interim SA Report at that time presenting an appraisal of seven broad spatial strategy alternatives. Also, the SA Note published at the sites engagement stage in early 2026 sought to consider broad strategy, in addition to presenting a structured discussion of site options.
- 5.2.20. As such, this section discusses:
- Conclusions from the Interim SA Report (2025)
 - Conclusions from the SA Note (2026)
 - Summary factors given the latest evidence and understanding of the plan scope

The Interim SA Report 2025

- 5.2.21. The emerging 'direction of travel', which was to support a balanced spatial strategy, was alongside six alternative broad spatial strategy options:
- 1) The emerging direction of travel
 - 2) Added emphasis on main towns
 - 3) Added emphasis on transport hubs
 - 4) Added emphasis on settlements near key employment areas
 - 5) Added emphasis on settlements at the edge of Bucks
 - 6) Added emphasis on other settlements
 - 7) Added emphasis on new settlements.
- 5.2.22. It concluded with a summary appraisal matrix, which aimed to present an 'at a glance' understanding of how the scenarios perform under the SA framework (both relative and absolute performance), and also a summary discussion for each of the alternatives.
- 5.2.23. Key points from the summary discussion are presented below:
- **Scenario 1: Direction of the travel** – under three topic headings there was quite strong support, namely: 1) 'Accessibility', reflecting an emerging focus on strategic growth locations; 2) 'Economy and employment', reflecting an assumption that a proportion of strategic housing growth would be directed to southern Buckinghamshire; and 3) 'Homes' given a clear strategic commitment to providing for LHN. However, under three headings concerns are raised, namely: 1) 'Climate change mitigation', recognising that this is a priority issue such that all reasonable steps must be taken through spatial strategy / site selection; 2) 'Historic environment', in recognition of the fact that deciding site allocations across a very large number of sensitive villages (also towns) whilst avoiding/minimising constraints is a major undertaking; and 3) 'Landscape', assuming a new strategic focus on the South of Buckinghamshire.
 - **Scenario 2: Main towns** – the appraisal discussed how there can be merit to a focus on urban extensions to main towns, although there can be infrastructure challenges. Key opportunities can relate to delivering: a new secondary school; employment land; cycle infrastructure; and strategic green/blue infrastructure (for example, enhancing a river corridor leading to wide-ranging ecosystem service benefits such as in terms of biodiversity, recreational access, heritage and flood water storage / flood attenuation. However, opportunities all too often are not fully realised in practice, and, in turn, there is a need for early consideration of what can be achieved by competing strategic site options, including working with site promoters. An aim can be to encourage healthy competition between site promoters in terms of demonstrating the merits of their site.

Lessons can be learned from recent experiences. For example, in Buckinghamshire there has been a major focus on coordinated and carefully masterplanned expansion of Aylesbury, and certain aspects have been well-received nationally, for example the focus on accessible greenspace and biodiversity net gain. Also, there is a major focus on delivering new link roads between the main radial road corridors, including with a view to supporting bus and cycle connectivity. However, planning applications mainly came forward ahead of the Vale of Aylesbury Local Plan (VALP).

A concern was raised under the Landscape heading in the knowledge that there can be a risk of towns expanding in such a way that characteristic landscape associations are eroded, e.g. expansion beyond a river valley. Equally, there can be issues of towns expanding along river and transport corridors in a way that risks 'sprawl', with new communities increasingly distant from the town centre (albeit typically linked by a relatively flat and therefore cycle friendly route). In this light, there is a clear case for ensuring a strategic approach to settlement expansion, with 'comprehensive' growth that maximises opportunities to deliver new and upgraded infrastructure (including green/blue infrastructure) rather than 'piecemeal' expansion over time.

It is also the case that the majority of the main settlements are located in the south of the County, where there is extensive landscape constraint associated with the Chilterns NL and also the Green Belt (albeit this is not a landscape designation).

Finally, there was clear support in the Transport Baseline Study (2024) for strategic extensions to the main towns, and a conclusion that a combination of Scenario 1 (Town / large village centres) and Scenario 2 (Town expansion) is *"preferred from the perspective of maximising sustainable, low carbon transport opportunities."*

- **Scenario 3: Transport hubs** – there was wide-ranging support for a strategy that focuses growth along transport corridors. However, transport corridors are often associated with inherent sensitivities and planning challenges, including because they will typically be associated with river corridors / valleys and historic settlement, e.g. such that maintaining settlement separation can be an issue. Having said this, a corollary is that growth along transport corridors can potentially support the achievement of biodiversity, landscape and wider natural capital / ecosystem service objectives, e.g. with a focus on delivering enhancements to river corridors. A further consideration is that a focus on transport corridors will often necessitate a cross-border and/or subregional approach. This can be relatively achievable along transport corridors, if strategic infrastructure priorities can be established.

Finally, with regards to the Transport Baseline Study (2024), it stated:

"Sites become far more valuable if they are to benefit from new transport infrastructure (e.g. Winslow sites with East West Rail opportunity). The Council will need to consider how this increased land value can be captured in the viability work for the local plan."

"A level of certainty of housing growth is needed to justify and facilitate investment in future transport links."

"Ultimately, the location of growth sites is critical to the level of opportunity in transport corridors and transport hubs. A focus on areas with the greatest opportunity for sustainable travel... such as the new EWR station at Winslow, would be beneficial."

- **Scenario 4: Employment areas** – the appraisal flagged some concerns with a strategy involving an increased emphasis on growth locations well linked to a strategic employment, albeit with much uncertainty ahead of confirming specific growth options.
- **Scenario 5: Edge of Bucks** – this option was difficult to appraise, as issues and opportunities are settlement-specific, i.e. there is no broad strategic case to be made for or against directing growth to the edge of Bucks (other than highlighting cross-border collaboration as an inherent challenge). The appraisal discussed specific settlements including Milton Keynes, Slough and Brackley.
- **Scenario 6: Other settlements** – this option was shown to perform quite poorly in that it was not the preferable option under any SA topic. This reflects three key factors:

- Growth would be relatively dispersed across settlements and delivered via smaller sites, as opposed to being concentrated at strategic sites and/or concentrated across sites at a given settlement or within a particular strategic sub-area (e.g. a strategic transport corridor). The concern is that opportunities would be missed to target growth-related investment to deliver on strategic priorities, most notably in terms of new and enhanced infrastructure (including green / blue infrastructure recalling the strategic 'nature recovery' agenda). However, on the other hand, ensuring that the Local Plan's housing supply portfolio includes a good proportion of smaller and medium sized sites is very important from a perspective of ensuring a robust delivery trajectory, i.e. one that is suitably front loaded and is associated with minimal delivery risk, as is ensuring a good geographical spread of sites. Also, it is important to recognise that many villages are associated with clear growth-related opportunities, in terms of: A) meeting housing needs (e.g. some villages have seen limited new housing over decades, let alone affordable housing); B) delivering targeted infrastructure benefits (e.g. a school expansion, a sports/recreation facility or active travel infrastructure); and/or C) maintaining and perhaps even enhancing existing services (including bus services), facilities, retail and general village vitality.
- Higher growth at villages does naturally give rise to a concern regarding ability to access higher order services and facilities and reliance on the private car to do so. Whilst the ongoing national switch-over to electric vehicles does reduce concerns, there remains a need to minimise traffic in congestion hotspots and also along rural roads with limited capacity and through historic village centres.
- Villages can have limited potential to accept growth from a historic environment perspective and potentially a wider environmental perspective. However, it is difficult to make this case with any degree of certainty, because there is much variation across villages, accounting for factors including the landscape context (e.g. heavily wooded versus expansive vale), the built form (e.g. nucleated versus dispersed) and the extent to which there has been 20th / 21st century expansion.

The appraisal also discussed the matter of assigning parishes a 'housing target' through the local plan, with allocations to then follow through a neighbourhood plan.

Finally, the Transport Baseline Study (2024) did not support this scenario, stating: *"This scenario can be viewed as... spreading the load which avoids overloading one settlement / one part of the network. But fundamentally... this scenario is the least favoured as it will perpetuate car-based developments and will not... reduce our carbon emissions... This goes against the LTP5 ambition..."*

- **Scenario 7: New settlements** – whilst the appraisal flagged support for this option under a high proportion of the sustainability topics/objectives used as the basis for the appraisal (the assessment 'framework'), this reflected *"an assumption that more than 12,000 homes could be delivered in a timely manner within the plan period."*

There is a need to be realistic regarding supply that can be achieved from new settlements in the plan period including the crucially important early years. In turn, there is a need to avoid over-reliance on new settlements within the housing delivery trajectory, as if one or more is delayed or fails to deliver the effect could be that Buckinghamshire fails to deliver on its committed housing requirement. Having said this, once commenced, new settlements can be an effective means of delivering new homes at pace (e.g. a new settlement might have two or three sales outlets, each able to deliver perhaps 150 homes per year). Also, existing land value can tend to be relatively low (given limited 'hope' value in comparison to land at the edge of settlements), supportive of development viability and, in turn, funds available for infrastructure, non-housing uses on-site, affordable housing, net zero, etc.

In this light, new settlements can represent a major opportunity, in respect of delivering on housing objectives alongside wider plan / sustainability objectives. They can also be strategically located, e.g. with a view to supporting strategic transport or employment growth objectives. There is explicit support for new settlements within the NPPF, particularly when delivered in line with garden community principles.

With regards to the Transport Baseline Study (2024), it stated a preference for strategic urban extensions over new settlements, but this potentially represented a precautionary approach in terms of infrastructure delivery. The Study notably stated:

“New settlements would need to be of a large enough scale to support itself and justify the infrastructure spend needed to connect to existing infrastructure. Otherwise, it would be perpetuating a car dependent society.”

“Where a site relies on proposed new infrastructure, even where it is included in the plans of the relevant authorities, the level of certainty over delivery and timing of that infrastructure is crucial to avoid a poorly connected, car dependent... population.”

Further points discussed within the appraisal were:

- The need to balance competing priorities including train / mass transit connectivity versus focusing growth where there is limited constraint including airfields.
- Ensuring realistic assumptions regarding the level of modal shift that can be achieved (as part of a ‘vision-led’ transport strategy) and residual needs to travel by car. In turn, the importance of directing to new settlements to main road corridors rather than rural locations linked by minor roads will need to factor in (and, in turn, potentially the need to deliver costly road and junction upgrades).
- Liasing closely with neighbouring authorities if it transpires that there are realistic new settlement options close to the edge of Buckinghamshire.
- Considering landownership, including working with landowners willing to work proactively with the Council including with a focus on land value capture.
- Considering the position of new settlement options within the landscape including how it relates to existing settlement and land use patterns. As part of this, it can be important to consider how topography and land uses such as woodlands can help to ‘frame’ new settlements with a view to containment and a clear identity. However, there can be a case for supporting ‘organic growth’ of new settlements.

5.2.24. In **conclusion**, the discussion above is a summary snapshot of analysis from 2025, but much of the analysis remains relevant to the current task of defining growth scenarios.

The SA Note 2025

5.2.25. The SA Note presented a discussion of the shortlisted site options (placed into a series of performance categories) under each of the SA framework headings in turn. Under each of the appraisal narratives there was a strong focus on discussing settlements in turn, with a view to discussing ‘strategic factors’ as well as individual site options.

5.2.26. Key conclusions included:

- **Accessibility** – “... it will be important to: A) carefully consider viability and delivery assumptions; B) consider clusters of strategic growth options within sub-areas including transport corridors; C) collaborate with neighbouring local authorities in respect of infrastructure capacity; D) consider growth-related issues and opportunities across villages in the north of Buckinghamshire; E) scrutinise the merits of low growth at several locations in the south of Buckinghamshire; and F) consider the possibility of targeted modest growth in the National Landscape.”
- **Air quality** – “... it is clear that there will be a need for further work to ensure a spatial strategy / suite of proposed allocations that aligns with vision-led transport principles. It is difficult to suggest a possible need for work specifically focused on air quality, recognising the trend nationally (from experience where air quality assessment work is undertaken as part of local plan-making few issues are flagged once the timing of growth is taken into account), but some targeted work could be appropriate.”
- **Biodiversity** – “... in many respects there is support for the distribution of potential supply options, and the strong focus on strategic sites, from a biodiversity perspective. However, there is a need for ongoing scrutiny of a number of the potential supply options, notably those: A) associated with the Bernwood Forest and River Ray Living

Landscape; B) to the north of the Chilterns Escarpment including given sensitivities relating to the Chilterns Beechwoods SAC; C) at Wendover noting Weston Turville Reservoir SSSI; D) at Bourne End and Beaconsfield given proximity to Burnham Beeches SAC; and E) in the vicinity of the confluence of the Rivers Misbourne, Alder Bourne and Colne. Also, there is a need for an ongoing focus on directing growth with a view to realising biodiversity opportunities via targeted investment. For example: in the north of Buckinghamshire there might be a focus on growth locations that deliver enhancements to the Bernwood Forest, the Padbury Brook corridor and/or the River Thames corridor; and, in the south of Buckinghamshire, there might be a focus on the Wye Valley, the Misbourne and Alder Bourne chalk stream corridors (both are a focus of existing initiatives), woodland enhancement (and improved accessibility) and/or heathland creation. Work should be informed by the Local Nature Recovery Strategy. More broadly, there is the potential for a high growth strategy within the catchment of the River Great Ouse (of which the Padbury Brook is a tributary) hence there could potentially be opportunities to explore around... catchment management."

- **Climate change adaptation** – "... it is clear that flood risk has fed in strongly as part of the work completed to date that has led to the current shortlist of site options (placed into three categories). Moving forward, there will be a need for further work to confirm that onsite flood risk can be avoided or mitigated having accounted for use mix, masterplanning and viability assumptions. The Environment Agency will wish to comment in detail through the current engagement exercise, for example in respect of: A) certain employment land options, particularly at New Denham; B) flood risk affecting Aylesbury town centre and Bourne End; C); and urban regen / intensification options."
- **Climate change mitigation** – "...whilst none of the supply options are known to represent a particular built environment opportunity, moving forward: A) site promoters are encouraged to identify site and scheme specific opportunities; and B) there could be a focus on identifying key built environment decarbonisation issues and opportunities to inform final decision-making in respect of broad spatial strategy and site selection. With regards to the broad strategic choices open to the local plan:
 - Choice of strategic sites – landownership should factor in strongly as a site selection criterion given implications for viability and smooth delivery, and, in turn, potential to take an ambitious approach to built environment decarbonisation alongside delivering on wider objectives. It is also important to ensure healthy competition between site promoters, aimed at maximising land value capture. Finally, whilst the focus of discussion in this section has been on built environment decarbonisation, it is also the case that the strategic site options vary considerably in terms of potential to deliver on vision-led transport objectives, as discussed above and as discussed further below.
 - Green Belt – strong development viability may be suggestive of broad strategic built environment decarbonisation case for ensuring that a good proportion of growth is directed to... the Green Belt, and one other consideration is the possibility of one or more heat networks linking waste heat from datacentres to communities. Again, whilst the focus here has been on built environment decarbonisation, there is also a need to consider transport decarbonisation, and in this respect, there is likely quite a strong case for ensuring Green Belt does not overly constrain growth strategy.
- **Communities and health** – "... there is a major opportunity to deliver growth in a way that maximises the net benefits for existing communities, including recognising that the baseline situation is one whereby growth continues to come forward in a sub-optimal piecemeal fashion under the presumption in favour of sustainable development, giving rise to issues and opportunities missed, most notably in terms of infrastructure capacity. However, there is much work to do in order to establish site specific policies and potential concept development frameworks / masterplans for allocations. Whilst it is recognised that there will be good potential to set out detail following the Local Plan it is important that the plan is adopted with sufficient confidence regarding what will be delivered by allocations (and what will not be delivered), and it can be noted that the Draft NPPF (2025) states: "*Allocations should identify any site-specific expectations and requirements.*" It can also be noted that the emerging Milton Keynes Local Plan

(MK2050) includes concept masterplans for all of the proposed strategic allocations, for example Figure 7.1 shows the concept plan for a site adjacent to Buckinghamshire. Finally, as well as a focus on site-specific opportunities there should also be a focus on identifying opportunities at the settlement and sub-area scales and then directing growth so as to deliver on these. One key matter is in respect of strategic green / blue infrastructure, and, in this regard, the Local Nature Recovery Strategy should feed in.”

- **Economy and employment** – “... there is a need to ensure a focus on alignment with key national, regional and sub-regional objectives. The emerging strategy for the Aylesbury area and the for the south of Buckinghamshire appears to perform well in this regard, but there is a need for further work to confirm how growth locations in the north of Buckinghamshire will deliver on an overarching strategy in combination. Ahead of a Spatial Development Strategy (SDS) for a sub-regional Strategic Authority there is a need for a strategic steer through the current engagement...”
- **Historic environment** – “... there are a wide range of sensitivities that will require further close consideration ahead of plan finalisation, informed by ongoing engagement with Historic England. An important broad strategic consideration is around impacts to the rural landscape and network of historic villages in the north of Buckinghamshire, but there are also some challenging potential growth locations in the south. It is acknowledged that there will be a need for some targeted Heritage Impact Assessment (HIA) work, including aimed at informing site specific policy / concept masterplanning. For example... Dacorum Borough recently completed HIA for five key proposed allocations and Milton Keynes undertook HIA for one proposed allocation.”
- **Homes** – “... there is a good mix of identified supply in terms of type of site and geographic location, but it will be important to avoid an over-reliance on strategic sites and urban sites, and there is a case for boosting supply from smaller greenfield sites. There is also a need to identify additional Gypsy and Traveller supply options. Finally, there must be an ongoing focus on maximising supply such that housing needs can be provided for in full and the supply trajectory in the Local Plan is robust, i.e. there is confidence in being able to deliver on the housing requirement, at least over the early years of the plan period ahead of a local plan review.”
- **Land and soils** – “...there is a high likelihood of the Local Plan leading to a significant loss of best and most versatile agricultural land, likely to include some grade 2 quality land and potentially also modest grade 1 land. However, it is difficult to know what significance to place on this issue (Natural England may wish to comment) and it is important to note that Buckinghamshire does not stand-out as constrained in the sub-regional context (such that any unmet housing need from Buckinghamshire could lead to pressure on neighbouring areas where agricultural land quality is higher). Moving forward, consideration should be given to directing or weighting growth away from areas with higher quality agricultural land, i.e. this is a criterion that should feed into final work on spatial strategy / site selection, albeit likely as a criterion assigned limited weight. Detailed surveying could also inform site masterplanning (e.g. orchards).”
- **Landscape** – “...a number of the NESS sites are associated with limited landscape sensitivity, but there are a range of important considerations, including relating to National Landscape setting and valued landscapes associated with the Mid Vale Ridge in the north of Buckinghamshire. Within the Green Belt there are a number of areas with sensitive settlement gaps, and at all locations there is a need to consider containment and the importance of comprehensive growth that maximises benefits and minimises risk of sub-optimal development creep / sprawl over time.”
- **Transport** – “... it will be crucially important that key stakeholder organisations comment in detail through the current consultation in order to inform plan finalisation and ensure that growth in Buckinghamshire aligns with vision-led transport principles.”
- **Water** – “... this section has presented a high level discussion, in the knowledge that the Stage 2 WCS will inform work to consider site options at the next stage. Overall, it appears that water resource and water quality issues are unlikely to serve as a significant factor with a bearing on spatial strategy / site selection, but there is a need for ongoing work in collaboration with partner organisations. A key issue is strategic

targeting of growth with a long term perspective, as opposed to piecemeal and unpredictable growth. It is noted that water companies often favour strategic sites, which can be planned with a long time horizon and can deliver innovative solutions.”

Concise discussion of broad spatial strategy factors

5.2.27. In the knowledge of the emerging Proposed Submission Local Plan and the latest evidence bases, as things stand in July 2026, key considerations are as follows:

- **North / south Buckinghamshire** – beginning with the south, this might be defined as the area covered by the London Green Belt, and within this the majority of land also falls within the Chilterns National Landscape (CNL; which extends beyond the Green Belt only to a limited extent), although the south east of Buckinghamshire is a significant and key area of Green Belt that falls outside of the CNL.

The CNL is a major constraint that greatly limits growth opportunity, albeit targeted opportunities for beneficial growth must still be considered, e.g. at High Wycombe (the main town in the south of Buckinghamshire), Amersham (a very well-connected town) and villages that have seen little growth over decades. The Green Belt is a policy designation with the fundamental aim of preventing urban sprawl by keeping land permanently open, and local plans can only release Green Belt in ‘exceptional circumstances’ (ECs). Whilst there is a case for ECs in the current Local Plan context, including given identifiable growth opportunities (broad spatial strategy-related, settlement-specific and site-specific), there is also a counter argument in that growth could be weighted to the north of Buckinghamshire to the extent that the Local Plan does not need to release Green Belt (other than where sites are already permitted).

Moving on to the north of Buckinghamshire, this is a large and diverse area, but a defining characteristic is overall fewer constraints to growth relative to the south. Aylesbury and Milton Keynes (on the edge of Buckinghamshire) are established strategic growth areas, and then a second key broad spatial strategy consideration is transport connectivity, given that much of the north is rural.

Finally, there is a need to consider the scale of recent and committed growth across the two areas, given that both high and low growth at settlements can create issues.

- **The settlement hierarchy** – there is a need to direct growth in line with the settlement hierarchy whilst also considering targeted departures. With regards to larger towns, the key consideration is that several are associated with limited growth opportunity due to constraints and/or Green Belt designation (subject to work to explore ECs). With regards to smaller settlements, Winslow is notable as a well-connected village that is well-placed to grow into a town following the arrival of East West Rail, and both Princes Risborough and Haddenham also benefit from good rail connectivity.

The next consideration is the potential to depart strongly from the settlement hierarchy by supporting new settlements, as discussed below, and then a final consideration is the importance of a ‘boundary blind’ spatial strategy – as far as possible given the inherent challenges of cross-border collaboration – that supports the achievement of objectives for cities and towns on the edge of Buckinghamshire, most notably London, Milton Keynes, Slough, Leighton Buzzard and Brackley.

- **Strategic versus non-strategic sites** – there is a clear case for directing a significant or even a high proportion of growth to strategic-scale sites that can be masterplanned with a view to delivering benefits to new and existing communities over-and-above new homes, including in terms new and upgraded infrastructure. Also, it is pragmatically the case that a focus on strategic sites helps to ensure that preparing a local plan to deliver 90,000+ homes over a 20 year period (with a tight deadline and limited resources) is a manageable exercise. It is for this reason that the Council has worked through a major staged workstream known as the New and Expanded Settlement Study (NESS), with a focus on site identification, sifting / selection and masterplanning including with a particular focus on infrastructure and deliverability (the latter being a key consideration as strategic sites are often complex and challenging to deliver). The NESS is discussed further below, but in summary a key milestone was reached in February 2026 with publication of the NESS Stage 2 report that assessed a shortlist of

18 NESS site options, and subsequently Stage 3 and 4 reports have considered a refined shortlist and considered masterplanning and delivery in increasing detail.

However, it is also crucially important that a good proportion of growth is directed to smaller and medium-sized sites, particularly with a view to ensuring a robust housing supply 'trajectory', namely one where the housing requirement is delivered year-on-year over the crucially important early years of the plan period (see NPPF paras 72 and 78) and with minimal delivery risk (where a diverse portfolio of geographically dispersed smaller sites has far lower risk than a portfolio of one or two strategic sites).

Also, medium-sized and even smaller sites can deliver on strategic objectives for smaller settlements, in terms of providing for housing needs (including affordable and specialist housing), delivering infrastructure (community / green / transport) and maintaining/enhancing services, facilities and general vitality. The NPPF states support for smaller sites including because they are suited to delivery by SME housebuilders and can allow "opportunities for villages to grow and thrive", and it is also the case that smaller sites tend to benefit from strong development viability such that they can deliver on wide ranging policy 'asks' alongside delivering homes.

- **Urban growth / supply** – whilst any local plan must support town centre regeneration and maximise housing supply from brownfield / previously developed land (PDL), there is a need to caution against over-reliance on this source of supply, particularly in the crucial early years of the plan period. This is because PDL tends to be complex and ultimately challenging to deliver, and there tends to be uncertainty regarding the timing of delivery (e.g. due to existing uses), such that high reliance on PDL can lead to a supply trajectory with delivery risk (i.e. such that the Council risks failing to deliver its housing requirement and so faces punitive measures). Also, viability challenges often mean that PDL sites can only deliver if compromises are made, e.g. it is not uncommon for PDL sites to deliver zero affordable housing.

Finally, it should be noted that constraints to growth must also factor-in as part of a strategy aimed at maximising urban and wider PDL supply, for example: A) town centres typically have historic environment constraint; B) taller buildings and high density developments can affect urban character; C) there can be certain infrastructure challenges, e.g. schools capacity; D) 'under-used' land in urban areas can tend to be areas subject to flood risk (e.g. car parks and industrial / commercial land); and E) some PDL sites can be poor locations for housing including in terms of accessibility.

- **Transport infrastructure** – there is a need to align with 'vision-led' transport planning principles, which partly means directing growth in line with the settlement hierarchy and to strategic sites (which can deliver transport infrastructure and achieve a degree of self-containment), but there are also many wider transport/connectivity and accessibility issues and opportunities that must factor-in. Ultimately the aim is to support modal shift towards 'sustainable' modes and minimise the need to travel.

This is a challenging exercise, but key factors include: A) rail connectivity, e.g. parts of the south of Buckinghamshire are very well-connected; B) the strategic road network, with a need to facilitate targeted major upgrades, including aimed at 'fast and frequent' bus corridors; C) maintaining and enhancing the wider bus network; D) targeted upgrades to cycle infrastructure in line with the LCWIP aimed at a major step change in the ability to cycle to key destinations; E) directing growth to locations around the edge of settlements with good accessibility / connectivity credentials, or where there is an opportunity to deliver enhancements; F) congestion on the wider road network, including at pinch point junctions, through villages and along rural lanes (including because congestion is a barrier to bus connectivity and safe walking/cycling); and G) consideration of matters relating to 'future mobility'.

- **Economic growth opportunities** – in headline quantitative terms it is *relatively* straightforward for the Local Plan to provide for local employment land needs (in contrast to LHN), particularly because there is a major site that is available and well placed to deliver 50+ ha of new employment land over the plan period, namely Westcott Venture Park (north west of Aylesbury). However, beyond the headline numbers there are also wide ranging qualitative considerations around the types of

employment land that are supported in particular locations, and then there is also the crucial matter of aligning housing growth with the needs of key sectors of the economy.

There are a number of existing and potential future strategic hubs and corridors of economic activity to be supported/enhanced, including with a larger-than-local perspective. Key areas are both in: A) the north of Buckinghamshire (including the Oxford to Cambridge corridor, which is of the highest national significance, and the Milton Keynes to Silverstone area as a hub for motorsport and advanced engineering, and a further consideration is that Milton Keynes cannot meet its identified need for warehousing/logistics space); and B) the south of Buckinghamshire (the M40 corridor; nearby Heathrow and the M4 corridor; the film industry focused on Pinewood; and other activity linked to the M25, the M40 and well-connected rail stations). However, Aylesbury is also a key centre of economic activity, including with the Arla Enterprise Zone and Stoke Mandeville Hospital, plus Aylesbury links to Westcott Venture Park where there is the potential to develop a Space Cluster on the A41 linking to Bicester, which itself is an important economic hub linking to the M40 and Oxford). Finally, there is extensive interest in new data centres in the south of Buckinghamshire, but it is difficult to confirm a need figure, let alone 'exceptional circumstances'.

- **Community infrastructure** – this is a key issue for local communities, with a need to direct growth to locations with existing capacity or where growth can deliver new capacity (including potentially to address an existing capacity issue). Secondary school capacity is a key issue, and it is only large-scale strategic sites that can deliver a new school (or perhaps even two new schools, recalling that Buckinghamshire has a grammar school system), but primary school capacity is also highly relevant when defining growth scenarios, and there can also be an opportunity to direct growth in order to deliver new health facilities (but doing so is challenging due to a need to align with NHS strategy). A specific issue of considerable relevance in the context of the Buckinghamshire Local Plan is primary school capacity at villages, with there being the potential for schools to be both over and under capacity (given declining birth rates) and with village schools often varying significantly in terms of their potential to expand.
- **Viability** – the greenfield vs brownfield distinction has already been discussed, but it is also important to note the distinction between different parts of Buckinghamshire, in terms of the ability to require developers to deliver on policy asks. There are many potential policy asks with cost implications, and therefore many potential variables when considering development viability, but a recent Viability Study reaches a headline conclusion that (having made a series of assumptions regarding various policy asks): greenfield sites in the North and Central parts of Buckinghamshire can deliver around 25% affordable housing; whilst those in the west, south and east can deliver 40%.
- **Wider factors** – there are many wider factors that must feed into spatial strategy, for example relating to: A) biodiversity and the nature recovery agenda, informed by the LNRS; B) the need to support transport and built environment decarbonisation, which must factor into both spatial strategy / site selection and development management policy (with viability at the intersection of the two aspects of the Local Plan), e.g. delivering aspirational transport infrastructure, or achieving built environment emissions standards beyond the minimum requirements in Building Regulations; C) water availability/supply and capacity at wastewater treatment works, which is a risk for many local plans in the South of England, but it is difficult to conclude implications for spatial strategy / site selection; D) very high Gypsy and Traveller accommodation needs, although links to the task of defining growth scenarios are limited (although, one consideration is that strategic housing or employment sites can be masterplanned to deliver a site/pitches); and E) community and wider stakeholder aspirations and concerns, including as understood from neighbourhood plans and representations made through recent consultation and engagement exercises.

Conclusion on broad spatial strategy

- 5.2.28. The above discussion of broad spatial strategy factors serves to frame consideration of site options and, in turn, the defining of reasonable growth scenarios.

5.3. Site options

Introduction

- 5.3.1. The aim here is to introduce the large number of site options that are potential ‘building blocks’ for growth scenarios, ahead of further discussion in Section 5.4.

Overview

- 5.3.2. A starting point is the 1,432 sites that have been considered through the Council’s Housing and Economic Land Availability Assessment (HELAA), which draws a headline distinction between: A) those that are available, achievable and suitable for allocation; and B) those that are not on the basis of failing one or more of the above criteria.
- 5.3.3. Also, a separate workstream has considered large-scale strategic site options, namely the New and Expanded Settlement Study (NESS). Furthermore, another key workstream to note is Green Belt Assessment (GBA) aimed at identifying grey belt, recognising that NPPF paragraph 148 requires that, where it is necessary to release Green Belt land for development, priority should be given to releasing grey belt.
- 5.3.4. By early 2026 a draft of the HELAA had been completed as well as a Stage 1 GBA, and the Stage 2 NESS study had been completed. This completed work (alongside other workstreams) then allowed the Council to publish site options as part of a sites engagement exercise, with sites categorised as: A) ‘potential supply’ – meaning that the site was an emerging preferred option for allocation; B) ‘grey belt supply’ – meaning that the site is likely grey belt such that it might be prioritised for allocation should there be exceptional circumstances for Green Belt release; C) ‘further assessment required’ – meaning that the site is not an emerging preferred option but remains in contention subject to the outcomes of engagement and further work; and D) ‘NESS potential supply’ – meaning that the site is an emerging preferred NESS site for allocation.
- 5.3.5. As of July 2026, the proposed approach is to allocate: A) the great majority of the ‘potential supply’ sites from sites engagement stage including the NESS potential supply sites; and B) select sites that were in the ‘further assessment required’ category at the sites engagement stage. The proposal is not to allocate any sites in the Green Belt bar sites that are already committed and select Gypsy and Traveller sites.
- 5.3.6. As such, at the current time there is a key distinction between: A) proposed allocations; and B) omission sites (i.e. sites not proposed for allocation).
- 5.3.7. This is a key distinction to inform definition of growth scenarios. Specifically, the task is to identify: A) proposed allocations that are ‘marginal’ such that they might be explored as a variable across the growth scenarios; and B) omission sites are ‘marginal’ such that the option of allocation might be explored as a variable across the growth scenarios
- 5.3.8. When seeking to identify which sites to take forward to the growth scenarios as a ‘variable’ (as opposed to proposed allocations to take forward as a ‘constant’ across the growth scenarios, or omission sites to ‘rule out’ such that they do not feature) there is a need to consider categories of sites and in a broad sequential order of preference:
- Completions – these are sites that have already delivered since the start of the plan period, such that supply from these sites is a ‘given’.
 - Commitments – these are sites either with planning permission (such that supply is essentially a ‘given’) or with an existing allocation that can safely be rolled forward.
 - Part commitments – these are sites with an existing allocation where the proposed approach is to support additional homes (or, in some cases, to assign a housing capacity figure to site for the first time, e.g. previous employment allocations).
 - Town centre sites – these are new proposed allocations within or near to a town centre. There is a clear case for holding these sites ‘constant’.

- **NESS sites** – there is a clear need to examine these sites closely, i.e. to consider whether any of the proposed allocations and/or omission sites are ‘marginal’.
 - **Other sites** – there are a great many other sites, both proposed allocations and omission sites, such that it is inherently challenging to identify marginal sites to explore as a variable across the growth scenarios, versus sites to hold constant (proposed allocations) or rule out (omission sites). These sites might be placed into various categories, for example according to size (some sites are strategic in scale) or proximity to a well-connected rail station (a factor that fed into the HELAA). With regards to omission sites specifically, a key distinction is between sites within and outside of the Green Belt and, in turn, whether omission sites in the Green Belt are grey belt (informed by a recent Stage 2 Green Belt Assessment, GBA).
- 5.3.9. This categorisation of sites is used to structure the discussion in Section 5.4. Specifically, within Section 5.4. the aim is to consider categories in turn and, for each category, reach a conclusion on whether sites/supply should be a ‘variable’ across the growth scenarios. In turn, for each of the variable categories there is also a need to reach a conclusion on specifically what category-specific scenarios to explore.
- 5.3.10. The final task here, within Section 5.3, is to discuss the NESS sites.

NESS sites

- 5.3.11. As discussed, it is immediately apparent that supply from NESS sites must be explored as variable across the growth scenarios, hence it is appropriate to discuss NESS sites here, within Section 5.3, rather than deferring the discussion to Section 5.4. Specifically, the aim is to decide: A) which of the proposed allocations to hold constant across the growth scenarios versus those to explore further as a variable; and B) which if any of omission sites to explore further as a variable.
- 5.3.12. The NESS Stage 2 Report published as part of the sites engagement exercise in Feb/March 2026 assessed 18 site options; however, three were ruled out in light of the report, such that they were not a focus of the engagement exercise (see the interactive map from the sites engagement stage [here](#)). Specifically, the Burnham, Quainton and Oakley options were ruled out and need not be considered further (N.B. these sites were discussed in the SA Note published as part of the engagement exercise).
- 5.3.13. Figure 5.1 at the end of this section presents the long list of 18 NESS site options.
- 5.3.14. Focusing on the remaining 15 NESS sites, at the sites engagement stage these were placed into two categories: 1) better performing sites included in the ‘potential supply’; and 2) sites requiring further assessment. 7 sites were placed into category (1), and all are now emerging proposed allocations. Taking these in turn:
- **Princes Risborough NESS** (597 homes increase to the existing allocation) – the Wycombe Local Plan (2019) directed strategic growth to land north of the Princes Risborough between the railway line in the west and the Monks Risborough station-area in the east. 96 homes on PDL have delivered, leaving 2,202 homes still to be delivered. A Supplementary Planning Document (SPD) was adopted in 2019; however, delivery has proved challenging, largely because of the need to deliver a ‘relief road’ to reduce the issue of traffic between High Wycombe and Aylesbury passing through the town centre. A site for 390 homes received a resolution to grant permission in 2025 ([18/06916/FULEA](#)) but it was subsequently not possible to reach an agreement on funding for infrastructure, and this matter is now the subject of an ongoing appeal. The NESS has explored intensified and/or expanded scheme options including aimed at delivery, and the outcome is a proposed approach that would see an additional 597 homes within the existing committed site boundary.⁷ These proposed changes warrant scrutiny, including from a CNL setting perspective, but it is reasonable for this NESS site to be held ‘**constant**’ across the growth scenarios.

⁷ At the sites engagement stage the existing allocation was identified as falling within the ‘potential supply’ category whilst expansion options were identified as falling within the ‘further assessment required’ category.

- **Aylesbury NESS** (3,650 homes in the plan period; 9,000 in total) – this would deliver a major strategic urban extension to the north east of Aylesbury. A key benefit is delivery of a new strategic link road between the A413 and the A418, plus there is the potential to deliver strategic community infrastructure (including three primary schools and a secondary school) and a major area of new strategic greenspace along the River Thames corridor at the northern edge of the site. There is also a separate proposed allocation adjacent to the west (Site 3113; Land to the North of Martin Dalby Way) and together these sites have the potential to complete the strategic northern expansion of Aylesbury,⁸ protecting the River Thames corridor and leaving a buffer to the series of historic villages to the north which are associated with the raised and undulating landscape of the Mid Vale Ridge (currently designated as an Area of Attractive Landscape (AAL) although the designation is proposed *not* to be taken forward). The importance of a long-term strategic approach is highlighted by the possibility of future planning applications to the west (PL/25/6042/EIASR) and north (PL/26/00219/EIASR) of Berryfields, plus there is a pending planning application for 150 homes within the NESS site (PL/26/02770/OA). Overall, this NESS site is held **constant** across the growth scenarios because: A) there is a need to direct strategic growth to Aylesbury; B) land to the north is the preferable location for strategic growth; and C) there is support for a comprehensive approach to growth in this area, as opposed to sub-optimal piecemeal growth that risks missed opportunities particularly in terms of infrastructure.
- **Winslow** (3,650 in the plan period; 9,370 in total) – the possibility of large-scale strategic growth to the north of Winslow – over and above the recent and committed growth following allocations in the Vale of Aylesbury Local Plan (VALP, 2019) and the Winslow Neighbourhood Plan (2023) – has been under consideration for a number of years; for example, the option of a 3,000 home ‘new settlement’ featured in the growth scenarios that were a focus of VALP SA Report in 2017. The overriding factor here is access to East West Rail, with the new station soon to open and, linked to this, there is a significant opportunity to deliver new strategic employment land. Also, there are limited constraints affecting land to the north of Winslow, particularly to the north east where there is a former airfield. However, Winslow is a rural settlement, and road connectivity is challenging, including accounting for nearby growth at Buckingham and Milton Keynes. Also, there is a need to guard against ‘sprawl’ towards historic villages.

The emerging concept for the scheme has expanded in scale over the course of the NESS process, which highlights the challenge of defining an optimal scheme. However, it is also notable that the proposal throughout has been to deliver *two* secondary schools, which requires a very strategic scale of growth. Another factor is again a need to avoid suboptimal piecemeal growth, including noting that the Draft NPPF (2025) strongly supports growth close to well-connected stations. In this light the site can reasonably be held **constant** across the growth scenarios. However, it should be noted that there are also other emerging proposed allocations at Winslow, such that growth strategy must be considered in the round. Overall, Winslow is proposed 6,800 homes in the plan period, plus there has been recent growth.
- **Buckingham NESS** (2,235 homes in the plan period; 4,700 in total) – whilst Buckingham does not benefit from rail connectivity there is an established opportunity for strategic scale growth in this area to deliver on key objectives, particularly delivery of a new link road (to bypass the A421, which opened in 1982 as a bypass to the town centre). An important starting point is the work of Buckingham Town Council to prepare two Neighbourhood Plans over the past 10 to 15 years, as part of which there has been a clear focus on ensuring well-planned strategic growth and avoiding sub-optimal piecemeal growth leading to issues arising and opportunities missed.

⁸ Berryfields to the north west of Aylesbury was recently completed following construction starting in 2010, and Buckingham Park is the other recent new community (centred on a primary school). Aylesbury Parkway Station opened in 2008.

The recently adopted Neighbourhood Plan (2025) allocates a strategic site within the current NESS site, but as part of the plan-making process also considered the possibility of large scale strategic growth to the south of the town broadly as per the NESS site. The issue, however, is that the Neighbourhood Plan allocation that falls within the NESS recently gained planning permission (PL/26/04516/OA), which creates an issue for delivery of a new strategic road link. Furthermore, an issue is that two other sites within the NESS site have planning permission for a total of 720 homes (one of which was permitted prior to the 31st of March 2025 cut-off date, such that its supply of 420 homes is excluded from the NESS capacity figure presented above), plus a site nearby to the east recently gained permission at appeal for 220 homes.⁹ This all leads to a challenge for effective masterplanning / maximising benefits.

There are limited constraints in this area bar a headline concern regarding car dependency (there are reasonable links to Winslow Station, at a distance of 9.5km) and so a key consideration is ensuring a long-term strategic approach to include a secondary school. Also, this could assist with strategic planning for upgrades along the wider A421, accounting for growth at Winslow, Milton Keynes and Brackley.

On balance, it is reasonable to hold this NESS site **constant** across the growth scenarios, but again there is nonetheless a clear need for ongoing scrutiny.

- **Haddenham NESS** (3,545 homes in the plan period; 6,600 in total) – in some ways the situation is similar to Winslow, in that the village was assigned significant growth through the VALP (recent growth has delivered new strategic pedestrian and cycle links) and the possibility of significantly higher growth was explored via growth scenarios. There is also a similarity with Buckingham, in that the Parish Council has recently undertaken detailed work – under the banner of Future Haddenham – to explore growth scenarios aimed at ensuring strategic growth that avoids issues and realises opportunities, including in respect of a secondary school.

Similar to Winslow, the growth opportunity to a large extent relates to good rail connectivity (but the location and lack of parking at what is a ‘parkway’ station is a key issue), but there are also key differences, notably: A) Haddenham has good road and bus connectivity to several higher order centres; B) there are a range of constraints, most notably to the south of the village where there is a stream corridor linked to the valued historic core and with long distance views of the CNL; and C) there are several recent, pending or anticipated speculative applications that risk undermining strategy.¹⁰

As well as evidence through the Future Haddenham workstream, the Parish Council also submitted a detailed response through the sites engagement exercise (2026), and one key message (amongst others) is that land to the south west of Haddenham is sensitive in landscape and historic terms. In this regard, a key point to note is that subsequent NESS work has adjusted the concept masterplan such that growth to the south west is more restricted, and contained by a proposed major new area for formal outdoor sports. There is also potential for growth to the north to be well-contained by the A418 (beyond which there is landscape sensitivity), and the proposal is strategic greenspace to contain growth to the east. However, there is a concern regarding containment of growth to the west, which is the narrow gap to the Cuttle Brook / River Thame corridor and the town of Thame (the VALP SA Report in 2017 had considered the possibility of comprehensive growth to the west of Haddenham / east of Thame).

Overall, whilst there do remain ongoing questions to explore regarding the appropriate scale and configuration of growth, and associated infrastructure matters, on balance it is considered reasonable for this NESS site to be held **constant** across the growth scenarios. Finally, note that the figure of 3,545 homes in the plan period is over-and-above ~105 homes permitted prior to the 31st of March 2025 cut-off date.

⁹ Towards the west of the NESS site a site was permitted in 2022 for 420 homes following a VALP allocation (19/00148/AOP). At the eastern extent a site was permitted at appeal in 2025 for 300 homes following an allocation in the 2015 Neighbourhood Plan (23/00178/AOP). To the east of the NESS site a site was recently permitted at appeal for 220 homes (24/03426/AOP).

¹⁰ To the west is an application for 192 homes and a local centre close to the railway station (25/02006/AOP); to the north is an application for 700 homes alongside land for a 1 form-entry primary school (25/02417/AOP); to the east a scheme for 89 homes was permitted at appeal in 2024 (23/00311/AOP); to the east an application is anticipated for a 100 homes (25/01090/SO); and to the east there is an application for 86 homes adjacent to a recently permitted scheme for 15 homes (23/04009/AOP).

- **Turweston NESS** (2,890 homes in the plan period) – there is a strong case for growth here given containment provided by HS2, good access onto the A422 and the A43 and a location adjacent to Brackley, which is a large town in West Northamptonshire with a good employment offer, with the site relating quite closely to the town centre and main employment area. Also, there are good road links to employment at Silverstone and along the M40 corridor. However, West Northamptonshire Council raised a number of concerns through the sites engagement exercise (2026), particularly relating to: A) landscape and historic environment constraints; B) the challenge of linking to Brackley given the intervening A43 (costly upgrades would likely be required); C) capacity on the strategic road network including at key junctions (the A43 is a strategic route for HGV traffic); and D) pressure on infrastructure in Brackley noting recent, committed and proposed strategic growth (see the Draft West Northants Local Plan). Focusing on landscape / historic environment constraint, the issue is that the edge of Brackley in the vicinity of the NESS site is strongly associated with the valley of the River Great Ouse, and eastern valley side (the location of the NESS site) contributes to the setting of the two town centre conservation areas as well as Evenley Hall (Grade II listed) and Evenley Park (which is not a Registered Park and Garden, but nonetheless of value). Also, the NESS site is adjacent to Turweston, which is a village associated with a characteristic river / valley side location, and which is easily accessed from Brackley by footpath, and a related consideration is a named bridleway that passes through the NESS site. Finally, another matter for ongoing consideration is in-combination effects with growth at Buckingham (given a shared road and river corridor), and it is understood that there could be a strategic flood water attenuation opportunity.

Overall, whilst this is a challenging site there is good potential to mitigate issues through the masterplanning process, and there have been some significant evolutions to the concept masterplan through the NESS process. The optimum scale and configuration of growth warrants ongoing scrutiny (including with careful consideration given to land to the south of the A422 including land that falls outside of the NESS site) but on balance this site can be held **constant** across the growth scenarios.

- **Wing NESS** (1,630 homes in the plan period) – Wing is a relatively small village that links to Leighton Buzzard within Central Beds. However, the village benefits from a secondary school¹¹ and there is an opportunity for 'landscape-led' growth. Specifically, whilst the village is associated with raised land to the east of a stream corridor, there is now an opportunity to deliver a linked new community to the west, with rising topography providing containment. Also, a benefit is that there is just one landowner, namely the Diocese of Oxford, which is a 'positive' in viability and delivery terms.

However, there are challenges relating to car dependency (bus connectivity is likely to be challenging, also cycling to Leighton Buzzard involves crossing a large roundabout) and also achieving good access to the A418 (traffic would pass through the existing village, and primarily along one road if the conservation area is to be avoided). Also, there are landscape and historic environment challenges (there is good potential to mitigate through strategic greenspace, but concerns would likely remain, including traffic related). Overall, there is an opportunity to deliver a new community that delivers a primary school and strategic greenspace that relates well to an existing village with a secondary school, but transport and traffic challenges appear to be significant. On balance, this NESS site should be explored further as a **variable**.

- 5.3.15. In **summary**, having discussed the 7 NESS sites that were flagged as better performing at the sites engagement stage, and which are all now emerging proposed allocations, the conclusion is that 1 of the sites is taken forward to the growth scenarios as a 'variable' (Wing NESS) whilst the other 6 sites are progressed as a 'constant'.
- 5.3.16. The next port of call is then 3 NESS sites located outside of the Green Belt that were identified as requiring further assessment at the sites engagement stage and which are now proposed allocations in light of the engagement and subsequent work, namely:

¹¹ The school is associated with a relatively unconstrained location such that expansion could be an option.

- **Stoke Mandeville NESS** (1,650 homes in the plan period) – this is a strongly performing site in transport and accessibility terms, and there is a need to avoid sub-optimal piecemeal growth noting a recently refused application for 650 homes in the northern part of the site that is now being appealed (25/00167/AOP). However, there are two key issues: 1) Stoke Mandeville is associated with high current and committed growth, with VALP strategic allocations to the north (AGT1) and east (AGT4) plus there is recent and ongoing major construction works associated with HS2 and new strategic link roads (a new relief road has recently opened to the west of Stoke Mandeville); and 2) the site is within the setting of the CNL, and specifically is clearly visible in views from Coombe Hill (a popular destination), although it is important to note that: A) views are in the context of Aylesbury beyond; B) there is good potential for mitigation via strategic greenspace at the southern extent of the site; and C) more broadly, allocation potentially allows for a long-term strategic approach to growth in the sensitive gap between Stoke Mandeville, Weston Turville and Wendover. A further consideration is that the Stoke Mandeville Neighbourhood Plan was recently ‘made’ (July 2026) after a plan-making process stretching back over nearly ten years. On balance this site warrants being explored further a **variable** across the growth scenarios.
- **Cheddington NESS** (3,650 homes in the plan period; 5,100 in homes total) – Cheddington is a small rural village that is poorly connected to the strategic road network but is associated with a strategic growth opportunity given a ‘well-connected’ rail station, including with Milton Keynes reached in 20 minutes.¹² The village itself has limited historic constraint, and there is also a distinct hill to the west of the village that can be drawn upon for containment, but an issue is that the station is at the northern extent of the village in proximity to Mentmore Towers, which is a Grade II* Registered Park and Garden, plus the Grade II* listed church is located at the northern edge of the village. A further key issue is then views from Ivinghoe Beacon, which is a renowned CNL viewpoint. This is a matter that has been considered in some detail, and which informed a decision to omit land to the east of Cheddington at Stage 4 of the NESS process (although there is also a separate large proposed allocation that falls outside of the NESS site to the north east of Cheddington that is in line with Mentmore Towers as viewed from Ivinghoe; it would deliver a bypass to Horton as a key benefit). Finally, there is a cross-border sensitivity given likely traffic flows to/from Tring and the A41 via the Grand Union Canal (Aylesbury Arm) corridor. In conclusion, this site warrants being a **variable** across the growth scenarios, including noting it would essentially comprise a new settlement and there are clear infrastructure challenges.
- **Beachampton NESS** (3,200 homes in the plan period; 8,230 homes in total) – this would comprise a new settlement closely linked to Milton Keynes, and specifically located: to the west of Milton Keynes (more specifically to the west of two committed strategic growth locations and another proposed through the submission version of the Milton Keynes (MK) City Plan 2050, namely Shenley Dens); to the south of the small village / hamlet of Beachampton; to the north west of the village of Whaddon; and to the north east of the village of Nash. There is a case to be made for strategic growth in this area given proximity to Milton Keynes and with a view to a strategic approach that affords long term protection to: A) the River Ouse Valley to the north (including Beachampton); B) the Calverton Brook Valley to the east (which is proposed as a Special Landscape Area by the MK City Plan 2050); and C) the distinctly raised landscape to the south, associated with the villages of Nash and Whaddon as well as the Whaddon Chase woodlands (a former hunting forest). However, this is a rural area (understood to have historic associations) linked by a small number of lanes that pass through villages, such that there would be a need for extensive road upgrades. It is difficult to envisage good connectivity by public or active transport, and, in this regard, it is important to note that the MK City Plan 2050 is focused on strategic growth along strategic transport corridors aimed at delivering a mass rapid transit network (even a ‘metro’). This site is certainly warrants being a **variable** across the growth scenarios.

¹² At the time of writing the Draft NPPF (2025) proposes a ‘permanent presumption’ in favour of development in proximity to well-connected stations defined as: A) located within a top 60 Travel to Work Area by Gross Value Added; and B) with four trains per hour overall or two per hour in any one direction (weekday timetable). All of Buckinghamshire passes criterion (A), and so attention focuses on criterion (B). In this regard Cheddington qualifies because there are four trains per hour.

- 5.3.17. In summary, having discussed the 3 NESS sites that were categorised as ‘further assessment required’ at the sites engagement stage, the conclusion is that all 3 sites are taken forward to the growth scenarios as a ‘variable’.
- 5.3.18. Finally, in respect of NESS sites, there is a need to consider the remaining sites that were shortlisted at the sites engagement stage, but which are not emerging proposed allocations (in light of the engagement exercise and subsequent work), namely:
- **Chesham NESS** (1,650 homes in the plan period) – Chesham is a large and well-connected town, but growth opportunity is limited by the CNL and related factors (including steep topography, a constrained road network and the River Chess). The NESS site is associated with the primary sector of land around the settlement edge that falls outside of the CNL, and there is clear potential for strategic growth to avoid visual impacts on the CNL. However, a key issue is that the site is within the Green Belt and when viewed in isolation is likely not grey belt, including as it would project out from Chesham as an incongruous ‘extended finger’ of development. This might not be the case were the NESS site considered alongside a collection of smaller sites being promoted for development to the west (i.e. to the north west of Lye Green Road); however, issues with this are: A) a coordinated scheme would be difficult to achieve (a planning application is anticipated on part of the land to the north west of Lye Green Road; see <https://landnortheastofchesham.co.uk/>); B) not all of the land that would be required to deliver a comprehensive scheme has been promoted as available; and C) the resulting scale of growth could be problematic including in terms of transport connectivity. Focusing on transport connectivity, it is important to note that links to the town centre are challenging due to steep topography, and there would be a risk of rat-running to/from the M25 via the Chess Valley. A further challenge is fragmented land ownership within the NESS site. For these reasons this site is **ruled out** on balance.
 - **Chalfont St Peter NESS** (2,435 homes in the plan period) – Chalfont St Peter functions as a town in combination with Gerrards Cross, and there is a strategic case for growth as this is a relatively well-connected part of Buckinghamshire where growth has long been constrained by Green Belt designation. However, issues include:
 - The site is challenging in transport and accessibility terms noting distance and links to key destinations, notably: Chalfont St Peter centre and the comprehensive secondary school, with no nearby grammar school; Gerrards Cross town centre and station; and Little Chalfont. Also, steep topography again creates a challenge.
 - The CNL is adjacent although there is potential for mitigation and this is the far extent of the Chilterns dip slope with the adjacent CNL comprising Newlands Park which, whilst a heritage asset, is the subject of a consented masterplan for around 300 homes and a pending application for an intensified scheme (PL/24/3489/FA).
 - There are Green Belt sensitivities as: A) containment is challenging to the east, which is the watershed between the Misbourne and Colne valleys; and B) a constrained road network suggests the likelihood of needing to repurpose an HS2 temporary access road as a new link road between the site and the A413, which would then give rise to a concern regarding coalescence with Chalfont St Giles and, in turn, a possible 8km conurbation along the A413 / River Misbourne corridor.
- Also, within the NESS site a 975 home scheme recently gained permission at appeal (PL/22/2898/OA). There is merit in planning comprehensively for this area rather than risking sub-optimal piecemeal expansion over time, but it is difficult to suggest that a much larger scheme would deliver major additional benefits (e.g. a secondary school)¹³ and there would be transport challenges. Overall this site is **ruled out**.

¹³ There is no grammar school at Chalfont St Peter / Gerrards Cross, and the comprehensive school has capacity issues as evidenced by the need to stagger the school day for different year groups.

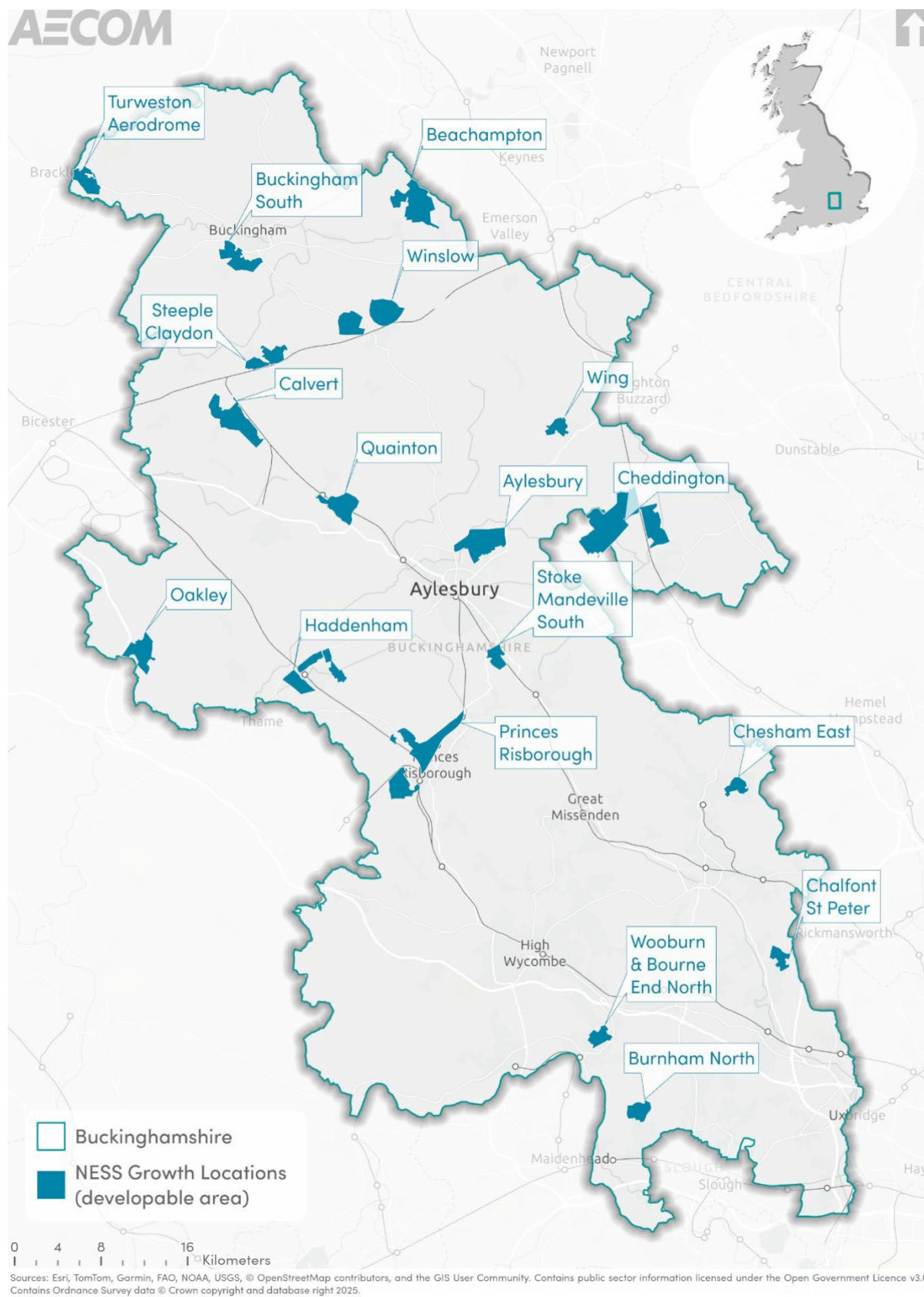
- **Bourne End NESS** (1,750 homes in the plan period) – was **ruled out** following the sites engagement stage due to land availability. This is steeply rising and visually prominent land associated with the Wye Valley, which whilst falling outside of the CNL is clearly a valued landscape feature, including given heritage links. There would also be a need to deliver a large Suitable Alternative Natural Greenspace (SANG), given proximity to Burnham Beeches SAC, which creates a challenge for masterplanning. Also, the site would risk merging Bourne End and Wooburn Green (High Wycombe), such that it is likely not grey belt. Furthermore, there are potentially road connectivity challenges, including noting constraint posed by the River Thames corridor (including noting single lane Cookham Bridge) and recently permitted Marlow Film Studios to the west. It is acknowledged that there is a strategic case for growth at Bourne End (notwithstanding significant committed growth), including given proximity to High Wycombe and Marlow, where there are constraints to growth, and because there is rail connectivity (but the station is only a branch line between Marlow and Maidenhead).
- **Calvert NESS and Steeple Claydon NESS**– these sites are in close proximity and can be considered jointly because they share a fundamental issue namely poor transport connectivity in the absence of major interventions to include one or two new East West Rail stations. This is a very rural area linked only by minor roads (there are not even any B-roads in the vicinity) that pass through villages and hamlets. These sites were discussed in the SA Note in February 2026, but are now **ruled out**.
- **Extended Princes Risborough NESS** – whilst attention now focuses on a Princes Risborough NESS site that aligns with the existing committed site allocated though the Wycombe Local Plan (2019), the sites engagement exercise also highlighted the possibility of extending the NESS site to the north and/or to the east, and the NESS Stage 2 report further highlighted the possibility of extending the site to the west. However, a key constraint to an extended site is impacts to highly valued views from the CNL, and in particular views from Whiteleaf Hill (a key destination). Finally, it should be noted that within the now-excluded parts of the NESS site (specifically to the north, namely at the village of Longwick, and to the east, namely at the village of Little Kimble / Smokey Row) there are now significant proposed allocations, as discussed further below (Section 5.4). An extended NESS site is ultimately **ruled out**.

- 5.3.19. In summary, having discussed the remaining NESS sites (from the shortlist of 15 introduced above) that are not emerging proposed allocations, the conclusion is that all can be ruled out, i.e. none need to be progressed to the growth scenarios.
- 5.3.20. In light of the above, the overall conclusion in respect of NESS sites is as follows:
- 6 NESS sites can reasonably be held constant across the growth scenarios, which in total are expected to deliver 16,567 homes ‘new supply’ within the plan period. Looking beyond the plan period these sites would deliver around 33,000 homes.
 - 4 NESS sites reasonably need to be explored as a variable across the growth scenarios. If all four were to be allocated, they would deliver 10,130 homes in the plan period and, looking beyond the plan period, around 16,600 homes in total.
 - Other NESS options are ruled out, i.e. are not progressed to the growth scenarios.
- 5.3.21. Finally, with regards to NESS sites, it is important to say that the assumed supply comes with a delivery risk, in that supply from these sites is inherently difficult to predict. Princes Risborough is a good example of this, with delivery of major road infrastructure upgrades highly challenging including on account of a need to cross railway lines.¹⁴

Conclusion

- 5.3.22. This section has introduced the range of site options, discussed how they can be placed into categories, and discussed NESS site options in detail. Categories of site options are discussed below (Section 5.4) leading to a conclusion on constants/variables etc.

¹⁴ Another example is one of the VALP strategic allocations at Aylesbury (AGT2), which was very recently permitted following a planning application submitted in 2018. The scheme includes 1,400 homes, a primary school and the south west link road.

Figure 5.1: The long list of potential NESS sites (Feb 2026)

5.4. Combining top down and bottom up

Introduction

- 5.4.1. Having discussed strategic factors (Section 5.2) and introduced categories of site options (Section 5.3), the next matter is to draw matters together in order to identify which of the site categories should be explored further as a 'variable' across the reasonable alternative growth scenarios (Section 5.5) versus those that can reasonably be held constant and, for each of the variables, to define category-specific scenarios.
- 5.4.2. This section discusses the following categories of sites / supply:
- Completions, commitments and a windfall assumption
 - Part commitments
 - Town centre sites
 - NESS sites
 - Other sites outside of the Green Belt
 - Other sites within the Green Belt

Completions, commitments and a windfall assumption

- 5.4.3. The starting point is supply from sites that either: A) have delivered since the start of the plan period ('completions'); or B) have planning permission or an existing allocation ('commitments'). Completions and commitments are calculated as of the end of the last monitoring year for which data is available, namely the 2024/25 monitoring year that ended on 31st March 2025, and as of this date there had been one year of completions totalling 1,577 homes, and there was 21,680 homes supply from commitments.
- 5.4.4. With regards to completions, Table 5.1 provides context by showing annual completions by area over the years prior to the start of the plan period. Points to note are:
- Delivery of 1,577 homes in 2024/25 contrasts with 2,522 dpa average delivery over the preceding ten years and the LHN figure of 4,322 dpa (which automatically applies as the housing requirement for decision-making purposes, ahead of a new Local Plan).
 - Recent delivery has been strongly focused on the former Aylesbury Vale area, with a good proportion of this being 'plan-led' including in-line with the Vale of Aylesbury Local Plan (VALP) that was adopted in 2021 and included within its housing requirement provision for 8,000 homes unmet need from the remainder of Buckinghamshire.

Table 5.1: Recent housing completions across the four legacy authority areas

Year	North & Central	East	South	West	Total (Bucks)
2014/15	1,355	114	139	423	2,031
2015/16	1,191	158	80	376	1,805
2016/17	1,309	221	411	788	2,729
2017/18	1,395	286	299	551	2,531
2018/19	1,758	353	328	814	3,253
2019/20	1,715	95	98	366	2,274
2020/21	1,357	146	121	357	1,981
2021/22	1,479	222	277	639	2,617
2022/23	1,980	287	479	1,005	3,751
2023/24	961	147	263	874	2,245
Avg.	1,450	203	250	619	2,522

- 5.4.5. With regards to the 21,680 homes commitments figure, this breaks down as:
- 13,243 homes supply comes from sites with planning permission as of 31st March 2025 (including site with a 'resolution to grant' permission). The three largest sites (ranging between 1,100 and 3,000 homes) are located at Aylesbury (two sites) and the edge of Milton Keynes. The next largest is a 540 home site at High Wycombe.
 - 8,437 homes from sites that are an existing allocation within the VALP, the Wycombe Local Plan or a 'made' neighbourhood plan, and where the proposal is simply to roll forward the existing allocation into the Buckinghamshire Local Plan. The six largest sites (ranging between 600 and 1,900 homes) are all allocations in the VALP.¹⁵
- 5.4.6. With regards to sites with planning permission, another important point to note is that a significant proportion of this supply is not 'plan-led' but rather comes from 'speculative' sites without an allocation that might not have been permitted were it not for the fact that Buckinghamshire has been subject to 'the presumption in favour of sustainable development' over recent years due to the lack of an up-to-date local plan.¹⁶
- 5.4.7. Also, it is important to note that the rate of new homes being permitted at speculative sites is increasing – because of Buckinghamshire's poor housing land supply position and also recent introduction of 'grey belt' as a new category of land in the Green Belt – such that numerous significant sites have been permitted since 31st March 2025 cut-off date and this trend will continue over the coming months ahead of the Local Plan being adopted; for example, there are currently around 100 pending planning applications for sites above 2 ha in size across Buckinghamshire. Some of these sites are now emerging proposed allocations (discussed below) such that supply is counted (as part of the overall Local Plan supply), but this is not the case for all such sites. As such, there is an additional source of supply that cannot be quantified at the current time (but data for the 2025/26 monitoring year will be gathered and fed in prior to plan submission).¹⁷
- 5.4.8. In summary, supply from completions (1,577 homes) and commitments (21,680 homes) as of 31st March 2025 comes to ~23,257 homes.
- 5.4.9. Additionally, account can be taken of supply from sites that have recently been permitted unexpectedly (i.e. sites that are not a proposed allocation), most notably a site for 975 homes at Chalfont St Peter granted at appeal. In total there are 6 such sites resulting in an additional supply of 1,725 homes, which brings the total supply from completions and commitments to 24,982 homes, and it is important to state that this figure will likely continue to increase as sites currently not accounted for in the supply gain permission.
- 5.4.10. Assuming 24,982 homes then the residual Local Plan target (assuming a housing requirement set at LHN) reduces to circa 66,000 homes (91,000 – ~25,000).
- 5.4.11. Also, this residual figure reduces further once account is taken of a windfall assumption, i.e. an assumption for the number of homes that will come forward in line with policy despite not having a local plan allocation. The total windfall assumption is 10,438 homes, which reduces the residual Local Plan target figure to ~55,600 homes.
- 5.4.12. Circa 55,600 homes is therefore a key target, but there are further complicating factors:

¹⁵ The largest existing allocation is VALP allocation PR4 at Princes Risborough, where the situation is: A) part of the site has planning permission (390 homes); B) the remaining existing allocation is for 1,908 homes; and C) the emerging proposed approach is to deliver 597 additional homes within the existing committed site ('densification'), as discussed further below.

¹⁶ Key policies are 'out-of-date' where an authority cannot demonstrate a five year housing land supply as measured against its housing requirement, or against the standard method LHN where a local plan is more than five years old. Where policies are out of date 'the presumption' applies, which is also referred to as a the 'tilted balance'. Also, it relates to the concept of 'planning by appeal', in that Councils often refuse applications only for an Inspector to grant permission at appeal. A further point to note is that fighting appeals is very costly, and there can be a risk of the council having to pay the costs of the appellant.

¹⁷ Sites unexpectedly gaining permission creates a considerable challenge for plan-making, notably in terms of infrastructure planning. It is also simply the case that speculative growth undermines public confidence in the plan-led system. Numerous applications are pending that would be transformative for settlements, notably in the Green Belt where settlements have seen little or no growth for decades but now potentially face major change via speculative applications in light of grey belt policy.

- Whilst there is a very strong argument to suggest that the housing requirement should be simply set at LHN (91,000), as discussed there is also the possibility of a higher housing requirement to account for a proportion of Slough's unmet housing need.¹⁸
- The 91,000 homes LHN figure assumes a plan period to 2045, which might mean a plan period that extends for 17 or 18 years from the point of plan adoption. On the one hand planning for a longer time horizon represents good practice (e.g. the emerging Milton Keynes Local Plan looks to 2050). However, on the other hand, the minimum requirement is to look ahead 15 years from plan adoption (which likely means to 2043), and there is a case for shorter plan periods given the national context of devolution (i.e. a future sub-regional Spatial Development Strategy covering Buckinghamshire will be well-placed to determine a spatial strategy for growth looking longer into the future). Furthermore, there is potentially some flexibility in the NPPF in respect of identifying supply for the latter years of the plan period (see NPPF paragraph 72), although this is unclear, and the safest assumption is simply that there is a need to identify supply sufficient to deliver the housing requirement over the plan period.
- A supply 'headroom' over-and-above the housing requirement can be called for as a contingency for delivery issues, i.e. to ensure that the requirement is delivered year-on-year (at least in the early years of the plan period). Specifically, there is a need to ensure that the Council can maintain a rolling five year housing land supply (5YHLS), as measured against the requirement and also accounting for the need to provide for a 5% or 20% 'buffer' as part of the 5YHLS calculation (NPPF para 78).

5.4.13. In summary, work to define growth scenarios starts from an understanding that each must deliver *new supply* – essentially via 'allocations' but also in the knowledge that the NPPF also supports 'broad locations' – to deliver in the region of 55,600 homes whilst also being mindful of the complicating factors including in respect of unmet need.

Part commitments

5.4.14. Turning to options for new supply, a starting point is the portfolio of existing allocations where the proposal now is to boost capacity relative the assumption made at the time of the allocation, or to assign a housing capacity figure to an allocated site previously not assigned a housing capacity figure. In total there are 36 such sites that are proposed to deliver a total of 3,339 homes *additional supply* (over-and-above what is already committed) and this can be described as supply from 'part commitments'.

5.4.15. Breaking this down further:

- At 15 sites the proposal is to boost the existing housing capacity figure, most notably: AGT1 at Aylesbury – an extra 482 homes bringing total capacity to 1,350; WIN010 & WIN026 at Winslow (centre) – an extra 405 homes bringing total capacity to 480; PR11 at Princes Risborough – an extra 92 homes bringing total capacity to 150; AYL052 at Aylesbury – an extra 57 homes bringing total capacity to 80; and CDN003 at Cuddington – an extra 55 homes bringing total capacity to 70.
- At 21 sites the proposal is to assign a housing capacity figure where previously the assumption was that the site would not deliver housing, e.g. existing allocations for employment or town centre uses. The great majority are PDL sites and the total new supply figure is 1,990 homes, of which 1,645 homes comes from High Wycombe sites.

5.4.16. The proposed new supply from part commitments warrants ongoing scrutiny, but it is reasonable to assume this supply as a '**constant**' across the growth scenarios.

¹⁸ As discussed, it would likely not be reasonable to provide for all of Slough's unmet need given the RBWM also links closely to Slough. Also, Slough is currently unable to evidence a precise unmet need figure (but has suggested broadly 5,000 homes).

Town centre sites

- 5.4.17. The second port of call, with regards to potential sources of new supply, is then a category of sites referred to as town centre sites, which are sites within *or in close proximity* to an existing town centre. After having discounted commitments and part commitments (which have been discussed), 60 new proposed allocations fall into this category, with a total capacity of 4,594 homes.¹⁹ These sites are located at:
- Aylesbury – 15 sites for a total of 3,155 homes
 - Chesham – 13 sites for a total of 460 homes
 - Amersham – 6 sites for a total of 200 homes
 - Buckingham – 3 sites for a total of 190 homes
 - Beaconsfield – 2 sites for a total of 155 homes
 - Wycombe – 2 sites for 85 homes
 - Princes Risborough – 4 sites for a total of 112 homes
 - Chalfont St Peter – 4 sites for a total of 40 homes
 - Burnham – 1 site for 10 homes
 - Great Missenden – 1 site for 10 homes
- 5.4.18. There is a clear strategic case for maximising supply from town centre sites, although this must be within reason having accounted for delivery risks and wider challenges associated with delivering a step change in development densities, to include taller buildings. One key matter is careful management of town centre car parking.
- 5.4.19. Around half of the sites are assigned a development density at or above 100 dwellings per hectare (dph), and some sites are assigned a notably higher density, including 7 sites in Aylesbury assigned a density in excess of 400 dpa, most notably:
- Site 3463 (Cromwell Court) – 75 homes on a 0.8 ha site at a density of ~940 dph.
 - Site 10788 (The Gateway) – 1,455 homes on a 2 ha site at a density of ~710 dph.
- 5.4.20. Also of note is Chesham town centre, where the average density across the 13 sites is 144 dph, and there are two sites with a proposed density in excess of 350 dph. A number of these sites are within or close to the Chesham Conservation Area, and a further consideration is the recently adopted Chesham Design Code, which states:
- “Density should be ‘gentle’, ideally between 50 and 150 homes per hectare. This is achieved by using typologies such as terraced townhouses and midrise mansion blocks that sit comfortably within conventional street and block patterns.”*
- 5.4.21. Taking the largest of the proposed allocations as a case study – Site 1039 (Star Yard, St Mary’s Way), which is proposed for 240 homes at 400 dph – this site is adjacent to the conservation area, affected by flood risk and is currently in use as a surface car park; however, in practice the heritage constraint could be limited as the conservation area ‘faces away’ from the site, there are few listed buildings nearby and the A416 dual carriageway is adjacent (although on the opposite side of the road is Lowndes Park, and there is a current proposal to extend the conservation area to include the park).
- 5.4.22. Redeveloping urban sites in Chesham and to higher densities in order to minimise pressure on the Green Belt is an established local objective, but there is a need for ongoing scrutiny in respect of specific sites and the overall strategy.
- 5.4.23. Overall, whilst there is a need for ongoing scrutiny of the proposed town centre allocations and the proposed densities, on balance it is reasonable to hold these sites and the total capacity figure of 4,584 homes **‘constant’** across the growth scenarios.

¹⁹ Additionally there are 35 town centre sites that are committed or part committed.

NESS sites

5.4.24. NESS sites have already been discussed above, in Section 5.4, with the conclusion that:

- 6 NESS sites can reasonably be held **constant** across the growth scenarios, which in total are expected to deliver 16,567 homes 'new supply' within the plan period. Looking beyond the plan period these sites would deliver around 33,000 homes.
- 4 NESS sites reasonably need to be explored as a **variable** across the growth scenarios. If all four were to be allocated, they would deliver 10,130 homes in the plan period and, looking beyond the plan period, around 16,600 homes in total.
- Other NESS options are **ruled out**, i.e. are not progressed to the growth scenarios.

5.4.25. Finally, with regards to NESS sites, it is important to reiterate that the assumed supply comes with a delivery risk, in that supply from these sites is inherently difficult to predict.

'Other sites' outside of the Green Belt

5.4.26. The emerging proposed approach is broadly to allocate those sites that were placed in the 'potential supply' category at the sites engagement stage. Specifically the emerging proposed approach is to allocate 128 sites to deliver 21,243 homes.

5.4.27. For the great majority of these sites allocation is considered to be firmly justified given the 'top down' strategic context and in light of a 'bottom up' site selection process that has involved: A) the Housing and Economic Land Availability Assessment; B) the sites engagement exercise; and then C) subsequent work to refine the allocations in light of representations received and ongoing evidence gathering (technical and engagement).

5.4.28. It is difficult to pinpoint sites where the proposal to allocate is perhaps marginal, such that the site might be tested further as a variable across the growth scenarios. However, some headline considerations are presented here.

5.4.29. Firstly, several sites are of a 'strategic' scale, including the following over 500 homes:

- Site 680 (south of Milton Keynes / north of Stoke Hammond; 3,780 homes) – on a strategic road corridor, but there is a need to liaise closely with MK regarding strategy, and there is a need to consider the gap to the Stoke Hammond Conservation Area. The western circa ¼ of the site was recently granted permission at appeal for 290 homes ([24/03601/AOP](#)), which highlights the need to carefully consider site capacity.
- Site 3113 (north of Aylesbury; 3,150 homes) – as discussed, this site would deliver major strategic growth to the north of Aylesbury in combination with the NESS site. It can notably help to complete the Aylesbury Gardenway walking and cycling route.
- Site 3532 (north of Aston Clinton; 1,660 homes) – assumed to deliver a school, employment land and a Gypsy and Traveller site; within the site there is a pending application for 93 homes and potentially a SANG ([PL/25/4746/OA](#) / [PL/26/04197/OA](#)).
- 3669 (east of Winslow; 1,500 homes) – as discussed this is in addition to a large NESS site. This site could deliver a comprehensive eastwards expansion as far as a series of woodlands and other assets, i.e. a benefit is relatively strong containment.
- Site 798 (north east of Cheddington) – would deliver comprehensive growth at Cheddington alongside the NESS site. The site benefits from being located adjacent to the rail station, and it can deliver a bypass to Horton, but containment is challenging (i.e. there is a risk of future development creep) and a potential issue is that the site is in alignment with Mentmore Towers as viewed from Ivinghoe Beacon (at a distance).
- Site 3578 (west of Shenley Park; 1,240 homes) – Shenley Park is a committed strategic urban extension to the west of Milton Keynes with a recently adopted SPD. The SPD site is larger and now has a proposed capacity of 1,265 homes (a boost of 115 homes relative to the SPD), which highlights a need to carefully consider the proposed expansion. It is well contained by ancient woodlands (Whaddon Chase), but equally these are a constraint, and there is a need to carefully consider A421 capacity.

- Site 1045 (west of Winslow; 630 homes) – as discussed there is a need to consider growth strategy for Winslow in the round. This site would extend a recent growth area, but benefits from being well-contained. The proposal is to support growth here but then resist large scale growth elsewhere to the west of Winslow, recognising that land falls away from the settlement edge towards the Claydon Brook.
- Site 4623 (south of Haddenham; 560 homes) – whilst the NESS site would deliver strategic growth to the west, north and east, this site is located to the south. There has been recent growth adjacent to the north, and further growth in this area is challenging on account of links to the strategic road network, the nearby renowned conservation area, a river corridor to the south and long distance views of the Chilterns. The site benefits from strong containment but there is a need to carefully consider capacity.

5.4.30. Secondly, there is a notable cluster of four sites to the west of Stoke Mandeville, in proximity to three existing or proposed large strategic sites. The capacity of these sites is 620 homes, and there is a case for a coordinated approach to growth that maximises benefits. There is additional land that could perhaps be considered (Site 1420, which is judged 'unsuitable' through the HELAA) in order to 'complete' the westwards expansion of Stoke Mandeville as far as HS2, but there are some constraints in this area.

5.4.31. Thirdly, there is a need to flag settlements proposed a high growth strategy relative to the existing size of the settlement / position in the settlement hierarchy:

- Tier 1 settlements – the proposed approach is for Aylesbury is to deliver 18,910 homes over the plan period in total (completions, commitments and allocations) compared to 4,186 homes at High Wycombe. However, this difference is largely on account of the constraints affecting High Wycombe, such that it is difficult to conclude that the difference necessarily suggests a risk of problematic high growth at Aylesbury. Aside from the town centre sites, the NESS site and the large strategic site to the north (discussed above), there are only three greenfield allocations for a total of 168 homes.
- Tier 2 settlements – Buckingham is proposed to be a primary focus of growth, with 3,376 homes proposed in total over the plan period, but there are no proposed allocations other than those already discussed above (primarily the NESS site). Princes Risborough is also proposed high growth (3,249 homes in total), but only 709 homes is new proposed supply, and again there are no proposed allocations other than those already discussed above (primarily the NESS site).²⁰ The remaining 6 tier 2 settlements are essentially proposed low growth over-and-above what is already committed, with none of them proposed any new greenfield allocations (but Chesham is proposed quite high growth from new town centre sites, as discussed).
- Tier 3 settlements – of the 20,599 homes set to be delivered across the tier 3 settlements over the plan period in total (all sources), 18,660 is proposed to be delivered across five settlements that have already been discussed, namely Winslow (6,859 homes), Haddenham (4,542 homes), Stoke Mandeville (3,624 homes), Aston Clinton (2,005 homes) and Wing (1,630). In addition to the sites already discussed above, Winslow is proposed to be allocated 3 sites for a total of 180 homes (all greenfield); Haddenham is proposed to be allocated 1 site for 25 homes (greenfield); and Aston Clinton is proposed to be allocated 9 sites for 310 homes (primarily greenfield). Focusing on Aston Clinton, none of these 9 sites stand-out as more challenging, but there is a clear need for a coordinated approach to growth, including noting that there has been recent somewhat piecemeal growth prior to the plan period.

As for the remaining 8 tier 3 settlements, none are proposed any 'new' greenfield allocations, because all are constrained by the Green Belt and/or CNL.

- Tier 4 settlements – taking the highest growth villages in turn:

²⁰ A challenging site at Princes Risborough is Site 4427 (Land to the rear of Poppy Road), where the existing allocation is for 58 homes, but the new proposal is to support 150 homes, including as it is in proximity to the railway station. It is an important site for delivery of a new relief road, but there are sensitivities relating to the adjacent CNL, a chalk stream and some onsite priority habitat. There are also two nearby sites within the urban area (one a 'part committed' site and one a 'town centre site') that are affected by the chalk stream and where flood risk is a constraint (but the rail station is in very close proximity).

- Cheddington – is proposed to deliver 6,015 homes over the plan period in total (all sources). In addition to the sites discussed above, there are five further proposed allocations (greenfield) for a total of 1,115 homes. It is important to be clear that the proposal is for a step-change at Cheddington such that it functions as a small town.
- Stoke Hammond – 372 homes in total including a site for 245 homes and another for 55 homes. The village benefits from proximity to Milton Keynes but a sensitivity relates to the proximity of the proposed strategic allocation to the south of MK (Site 680 discussed above). It is noted that Stoke Hammond's neighbourhood plan was made in 2025 and allocates a small part of the 245 allocation for 19 homes.
- Weston Turville – 360 homes all from new proposed allocations (mostly greenfield). Specifically, there are 9 proposed sites which require careful consideration, including accounting for adjacent strategic growth associated with Aylesbury / Stoke Mandeville and because there is a degree of CNL setting sensitivity.
- Long Crendon – 332 homes in total, including three proposed allocations for between 100 and 115 homes. This suggests a need for careful consideration of sites in combination with a view to maximising benefits / avoiding issues.
- Stone – 311 homes in total, including a committed site for 45 homes and three proposed allocations for 75 to 105 homes.

There are then 9 further tier 4 settlements set to see in excess of 100 homes as follows (in descending order of growth quantum): Newton Longville; Edlesborough; Waddesdon; Tingewick; Quainton; Ickford; Wingrave; Stewkley; Whitchurch.

This leaves 32 further tier 4 settlements, of which 19 are proposed allocations for a five homes or fewer. These villages are all located within the Green Belt and/or the CNL.

- Tier 5 settlements – taking the highest growth villages in turn:
 - Padbury – a site is proposed for 210 homes and another for 20 homes. The village links well to Buckingham and Winslow, and the larger site is adjacent to the village school (there is a pending planning application on part of the site).
 - Little Kimble – a site is proposed for 130 homes in addition to completions and commitments totalling 100 homes; the village is well-connected, including via a rail station, but there is potentially significant CNL setting sensitivity.
 - Berton – is located at the edge of Aylesbury between a recent/ongoing strategic growth location to the south and the proposed Aylesbury NESS site to the north.
 - Maids Moreton – is located at the edge of Buckingham. 161 homes will come primarily from a site permitted in 2022 following a planning application in 2016.
 - Slapton – is a notably small and rural village without a primary school, but the Cheddington NESS site is nearby. There are four proposed allocations for a total of 135 homes, including one that would extend a permitted site for 16 homes.
 - Gawcott – is very close to the Buckingham NESS. There is a proposed allocation for 120 homes and another for 20 homes.

5.4.32. In summary, the discussion above provides an overview of the emerging proposed approach to allocation of 'other sites' outside the Green Belt (i.e. sites over-and-above commitments, part commitments, town centre sites and NESS sites). In practice, this is the totality of the emerging proposed approach to allocation of 'other sites'.

5.4.33. From the discussion it is clear that there are numerous sites and settlements where the emerging proposed approach warrants ongoing scrutiny. Also, the broad strategy of supporting a degree of growth dispersal across villages, including some smaller villages, can be questioned in transport and accessibility terms, albeit there are also wide-ranging arguments in favour of supporting growth via small and medium-sized sites at villages.

5.4.34. However, on balance it is reasonable to hold all of the emerging proposed allocations constant across the growth scenarios (128 allocations to deliver 21,243 homes) in light of the site selection process and recalling the strategic context (in particular the stretching nature of LHN and the key need for a robust supply early in the plan period).

5.4.35. Next there is the question of non-Green Belt **omission sites** (other than NESS sites).

5.4.36. There are a great many such sites, and it is difficult to pinpoint sites where the decision not to allocate is perhaps somewhat marginal; however, considerations include:

- It is difficult to suggest settlements outside of the Green Belt where the emerging proposed approach stands-out as representing a lower growth strategy, which might be suggestive of a need to consider higher growth via allocation of omission sites.

However, one settlement of note is Longwick, which is a tier 4 settlement that links very well to Princes Risborough (including its northern expansion area), where there is good road connectivity and where there are limited constraints to growth in some respects. Also, it is notable that a large site (Site 3701; north west of Longwick) was proposed for 790 homes until a decision was made in July 2026 to remove the site from the plan. An issue is that there is a degree of sensitivity relating to the setting of the CNL (Whiteleaf Hill), including accounting for the in-combination effects of growth alongside intensified growth north of Princes Risborough, and a further consideration is that the village has seen recent somewhat piecemeal growth. It is not clear that the site could deliver strategic benefits to the village, e.g. community infrastructure.

- Aside from the site at Longwick, there are only a small number of other sites that were in the potential supply category at the sites engagement stage but which are now omission sites, and none stand out as marginal omission sites. The most significant site is Site 701 to the west of Winslow, which was identified at the sites engagement stage as potentially having a capacity of ~500 homes, but Winslow is set to see very high growth, and there is a case for avoiding the westwards sprawl of the village downhill towards the Claydon Brook. The second most significant is Site 5068 at Gawcott (capacity ~125 homes), but there are two other proposed allocations, and the village is in very close proximity to the Buckingham NESS site. Thirdly, Site 539 north of Wing (~50 homes) is of note, but it does not relate well to the settlement edge, and, again, Wing is proposed to see a high growth strategy (assuming the NESS site).

The small number of other sites that were 'potential supply' at the sites engagement stage but which are now omission sites are smaller sites subject to clear challenges, notably: Site 536 at Bishopstone intersects a conservation area and this is a small village without a primary school; Site 3125 at Northall comprises part of a field, the chalk cutting at Whipsnade is highly visible and this is a small village without a primary school; Site 3131 at Pitstone is constrained on account of an adjacent Grade I listed church and because the site is visible at close range from Pitstone Hill (CNL); and Site 6523 at Great Horwood was removed from the plan following completion of a Historic Environment Impact Assessment (HIA), and the Winslow NESS site is nearby.

- Possible higher growth west of Stoke Mandeville has been discussed above.
- Attention potentially also focuses on the Newton Longville area, but this area falls between transport corridors and there is high growth committed or proposed nearby.²¹
- Another settlement of note is Waddesdon, where there is a case for ensuring a strategic approach to growth to the north of the village, noting: A) the importance of the A41 corridor (including given links to Wescott); B) HS2 and recent road upgrades; and C) a nearby pending planning application for 535 homes ([22/03384/AOP](#)).
- There is a case for considering omission sites where there is a pending planning application, or where there have been pre-app discussions, because these are sites likely to be able to deliver earlier in crucially important early part of the plan period. However, allocating sites with a pending planning application can be perceived as inappropriate in that there is a case for letting the application process play out.

²¹ The SA Note (2026) stated: "Newton Longville – has modest potential supply but is notable on account of proximity to Milton Keynes including strategic expansion areas. Potential supply at the edge of Milton Keynes is focused along the key transport corridors to the west (A412) and the east (A4146), but the possibility of strategic growth at Newton Longville might be explored as a comparator, notwithstanding current poor transport connectivity (also heritage value / constraint). It is noted that the village primary school is quite large and is in a land-locked location, such that expansion is likely not an option."

- 5.4.37. In summary, it is reasonable to rule out all non-Green Belt omission sites, because: A) there is limited strategic case for higher growth from non-Green Belt omission sites; B) it is appropriate to put weight on the site selection process; and C) there is a pragmatic need to minimise the number of variables across the growth scenarios. As such, the approach to allocation of 'other sites' outside the Green Belt is held **constant**.
- 5.4.38. Finally, there is also the question of site capacities. A number of sites are associated with ambitious capacity figures; however, site capacities have been established in collaboration with specialists and are the outcome of an iterative process of developing site-specific policies, including aimed at realising opportunities. In this light, it is also reasonable to hold capacity figures constant across all of the proposed allocations.

'Other sites' within the Green Belt

- 5.4.39. In short, whilst the emerging proposed approach involves no *new* supply from Green Belt allocations, because there are not considered to be 'exceptional circumstances', there is a clear need to explore one or more alternatives to the emerging proposed approach that *do* involve new Green Belt allocations, i.e. supply from Green Belt allocations must be explored further as a **variable** across the growth scenarios.
- 5.4.40. Key reasons are: A) there are broad spatial strategy arguments in favour of directing growth to the south of Buckinghamshire; B) under any scenario whereby one or more of the 'variable' NESS sites is not allocated there would be a need to boost supply from non-NESS omission sites; and C) even under a scenario whereby all four of the variable NESS sites are allocated there is a case for boosting supply, either with a view to boosting the supply 'headroom' over-and-above a housing requirement set at LHN, or with a view to boosting the housing requirement (see discussion in Section 5.2).
- 5.4.41. In turn, the task is to define a scenario involving allocation of select better performing Green Belt non-NESS omission sites and, in this regard, key evidence comes from the Stage 2 Green Belt Assessment (GBA), which identifies a number of sites that are likely grey belt and give rise to limited wider concerns in respect of the fundamental aims of the Green Belt. Whilst wider planning considerations must also factor-in, the shortlist of likely or potential grey belt sites set out in the Stage 2 GBA is a good starting point.
- 5.4.42. The Stage 2 GBA discusses settlements in turn, and this informs the discussion below.

Leighton Buzzard

- 5.4.43. Site 2517 is likely grey belt, could potentially form a logical extension to the town and there have been previous planning applications. However, the Stage 2 GBA raises some concerns (notwithstanding the site likely being grey belt) and Central Bedfordshire Council raised some concerns at the sites engagement stage.²² On balance this site is ruled out, i.e. is not taken forward to the growth scenarios.

Wendover

- 5.4.44. Site 10794 could potentially deliver a significant northern extension to the town, and would likely need to be developed in part alongside strategic green infrastructure (it is understood that a planning application may be forthcoming for 350 homes within part of the site). However, it is not clear that the site is grey belt, because there is potentially significant 'NPPF footnote 7 constraint',²³ most notably relating to the setting of the CNL (the Chilterns escarpment is in close proximity, albeit there are limited views out from Wendover Woods). Also, there may be transport challenges given road connectivity via the town centre, and the adjacent grand union canal (Wendover Arm) is a constraint, as is a nearby SSSI. This site is also ruled out / not taken forward to the growth scenarios.

²² In particular, CBC stated: "CBC would expect to be involved in any detailed discussions from the outset as it is likely that any growth at this location would have significant implications for Leighton Buzzard and Leighton Linlade and we would wish to ensure there are no detrimental impacts... ensuring the capacity of existing infrastructure, services and facilities within the settlement are not compromised in any way. It would be expected that any proposed development on the site would deliver the necessary infrastructure requirements to meet the needs of the future community in full, and that CBC would be involved..."

²³ The Draft NPPF (2025) proposes to remove NPPF footnote 7 constraint as a factor when identifying grey belt.

Chesham

- 5.4.45. There is a strategic case for growth at Chesham (albeit there is set to be a high urban growth strategy, including with a focus on regeneration), and detailed consideration has been given to the possibility of growth to the north east, which is the primary sector of land around the edge of the town that falls outside of the CNL. There is a forthcoming planning application here, and there is a clear need to ensure that a strategic approach is taken to growth, rather than a suboptimal and potentially problematic piecemeal approach. However, the Stage 2 GBA highlights challenges to growth here, and transport connectivity is another challenge. On balance growth here is ruled out.

Amersham and Little Chalfont

- 5.4.46. There is a significant strategic case for growth here, albeit there is extensive sensitivity relating to the CNL. The Stage 2 GBA discusses only one site here, which is subject to constraints and likely has modest capacity. There is an adjacent large strategic site that is currently under construction. This site is ruled out.

Widmer End / Holmer Green

- 5.4.47. This is the northern extent of the High Wycombe 'large built up area' and, in turn, there is a strategic case for growth. There are clusters of sites both to the north and to the south of this area that are likely grey belt and relate well to the settlement edge, and there are pending planning applications. It is reasonable to test the option of ~500 homes across these sites (i.e. distributed both to the north and south of this area).

South west area

- 5.4.48. This area, as discussed in the Stage 2 GBA, covers the southern edge of the remainder of High Wycombe, Marlow, Marlow Bottom, Bourne End / Wooburn and Flackwell Heath. In particular, attention focuses on two adjacent sites to the west of Flackwell Heath, with one of the sites comprising a PDL site with planning permission for 80 homes (in use as a college) and the other comprising a greenfield site currently the subject of a pending application for 67 homes. There is limited strategic case for growth at Flackwell Heath, and the Stage 2 GBA raises some concerns. These sites are ruled out on balance.

Beaconsfield and Seer Green

- 5.4.49. Sites at Seer Green (a village with a rail station) are screened out by the Stage 2 GBA, such that the focus is on Beaconsfield, where the Stage 2 GBA considers a number of sites and site combinations (with a view to securing a defensible Green Belt boundary). To the east of Beaconsfield large sites are under construction or permitted, and whilst there could be some further growth potential, including with a view to a comprehensive approach to growth that maximises benefits and secures a defensible new Green Belt boundary, on balance it is not clear that there is a significant option for testing. However, there are clear options for testing to the south of the town (there is a series of small sites subject to limited constraint, although an issue is the adjacent M40) and to the south east of the town (there is a pending planning application). There are in-combination concerns relating to proximity to the historic town centre, which is a visitor destination, but on balance it is reasonable to test ~250 homes across these sites.

Chalfont St Giles

- 5.4.50. Chalfont St Giles is a historic village that is a visitor destination, but there is potentially a strategic case for growth given a good local offer and good road connectivity. However, traffic through the village centre is an issue (including noting flood risk) and there could be infrastructure capacity issues (e.g. capacity at the primary school and GP surgery). The Stage 2 GBA considers sites to the west, south and east of the village, and all are considered to be grey belt with some confidence. Also, all of the sites are currently the subject of pending applications. The assumption is 220 homes across these sites.

Chalfont St Peter

- 5.4.51. Constraints to growth are relatively limited in comparison to the majority of other larger settlements within the Buckinghamshire Green Belt, and there is good access to the Chiltern Line at Gerrards Cross, plus the Metropolitan Line at Chalfont and Latimer can be reached quite easily by car. Chalfont St Peter is also well-linked to the strategic road network and strategic employment areas. There has been some modest recent housing growth, and an application for 975 homes to the north was recently granted at appeal. On the basis of the Stage 2 GBA attention focuses on a cluster of adjacent sites to the south, which were previously a proposed allocation in the withdrawn local plan for former Chiltern and South Bucks, and where there is now a series of pending and forthcoming planning applications. The assumption is a comprehensive scheme for 300 homes, although it is acknowledged that a comprehensive scheme could be challenging.

Gerrards Cross and Tatling End

- 5.4.52. Sites at Tatling End are screened out, such that attention focuses on Gerrards Cross, where there is a strategic case for growth given very good transport connectivity and a good local offer. It is also noted that there has been limited growth over recent decades but there are now pending Green Belt planning applications to the west (400 homes) and south (76 homes), and further applications may be forthcoming. The Stage 2 GBA focuses on two sites located to the west and east of the town, and both benefit from good proximity to the town centre and rail station. However, the site to the east is clearly the preferable site, and so is taken forward for testing with an assumption of ~50 homes.

Burnham

- 5.4.53. Burnham is a historic settlement that has merged with Slough. Proximity to Burnham Beeches SAC is a clear constraint, and road connectivity is challenging, but a railway station on the Elizabeth Line is a 1-2km to the south. Links to Slough serve to suggest a strategic case for growth, and there has been limited growth over recent decades. Attention focuses on a site to the west where a planning application for 800 homes alongside a SANG is anticipated and, assuming a SANG in the northern part of the site as proposed by the site promoter, the site is likely grey belt. Given the strategic context relating to Slough's unmet need, this site does warrant testing (~800 homes).

Stoke Poges and Wexham Street

- 5.4.54. Sites at Wexham Street are screened out, such that attention focuses on Stoke Poges, which is a village notably in proximity to Slough, but where there are constraints including because this is broadly a sensitive area in biodiversity terms. There is a pending application for 317 homes to the east of the village, but the Stage 2 GBA sets out that a more logical approach would be to release a slightly larger area of land from the Green Belt with a view to a defensible boundary. On balance it is reasonable to test the option of growth here, given the strategic context, and ~350 homes is assumed.

North of Slough / Langley

- 5.4.55. There is a clear strategic case for growth here including given Slough's likely unmet housing needs (albeit there is no clear evidence to suggest what proportion should or might be provided for in Buckinghamshire). The Stage 2 GBA considers three large sites, and all are likely grey belt, but one of the sites stands out as perhaps preferable, namely a site located between Stoke Road and Langley Road. 200 homes is assumed.

Iver and Shredding Green

- 5.4.56. Sites at Shredding Green are screened out (this is a sensitive area in Green Belt terms, and there is a large planning application), such that attention focuses on Iver, which is a village well linked to Slough and London, including given Iver Station on the Elizabeth Line. The Stage 2 GBA considers two sites located to the north and east of the village (one comprises two adjacent HELAA sites) and both are likely grey belt. However, the site to the east is now partly proposed for Gypsy and Traveller pitches, which leaves the site to the north, where access could be challenging. Up to 300 homes is assumed.

Richings Park

- 5.4.57. As per Iver, Richings Park is a village well connected to Slough and London, including via Iver Station, although Richings Park is distinct as a 20th century settlement. The Stage 2 GBA considers four sites to the north, east, south and west of the village, and all are likely grey belt. A planning application for 700 is anticipated for the site to the north, which is adjacent to the station, and there is also an anticipated application for 200 homes on the site to the east. The site to the west is perhaps more sensitive, as this is the gap to Slough, and the main part of the site is divided into numerous ownership plots, whilst the site to the south is a less significant site (it is part permitted). On balance the assumption is 900 homes to the north and east of the village.

Iver Heath

- 5.4.58. Iver Heath is a dispersed settlement with limited constraint, and the village benefits from a strategic employment site at Pinewood, but there is a concern regarding sprawl and the loss of settlement separation in what is a fragile sector of the London Green Belt. The Stage 2 GBA considers three sites, but on balance the largest of these sites can be ruled out, given the importance of ensuring a strategic approach to growth in this area. On balance, the assumption is 150 homes across two sites located to the south west.

Denham and New Denham

- 5.4.59. Sites at Denham are screened out (the village is washed over by the Green Belt), such that attention focuses on New Denham. There is the potential for strategic growth in this area to complete the expansion of this sector of the London edge as far as the M40 / A40 / A4020 junction; however, growth in this area would be largely separated from the current urban edge by the River Colne, and on balance this option is ruled out.

Conclusion

- 5.4.60. In conclusion, it is reasonable to test a scenario involving ~4,000 homes from Green Belt omission sites as follows:
- Richings Park – 900 homes including a strategic site adjacent to Iver Station.
 - Burnham – 800 homes from a strategic site to the west.
 - High Wycombe (Holmer Green) – 500 homes from a sites to the north and south.
 - Chalfont St Peter – 300 homes from a cluster of sites to the south.
 - Stoke Poges – 350 homes from two adjacent sites to the east.
 - Iver – 300 homes to the north.
 - Beaconsfield – 250 homes from sites to the south and south east of the town.
 - Chalfont St Giles – 220 homes from sites to the west, south and east.
 - Slough/Langley – 200 homes between Stoke Road and Langley Road.
 - Iver Heath – 150 homes from two sites.
 - Gerrards Cross – 50 homes from a site to the east.

Conclusion

- 5.4.61. Having now discussed all supply categories of supply, Table 2.2 presents a summary.

Table 5.2: Summary of constants and variables

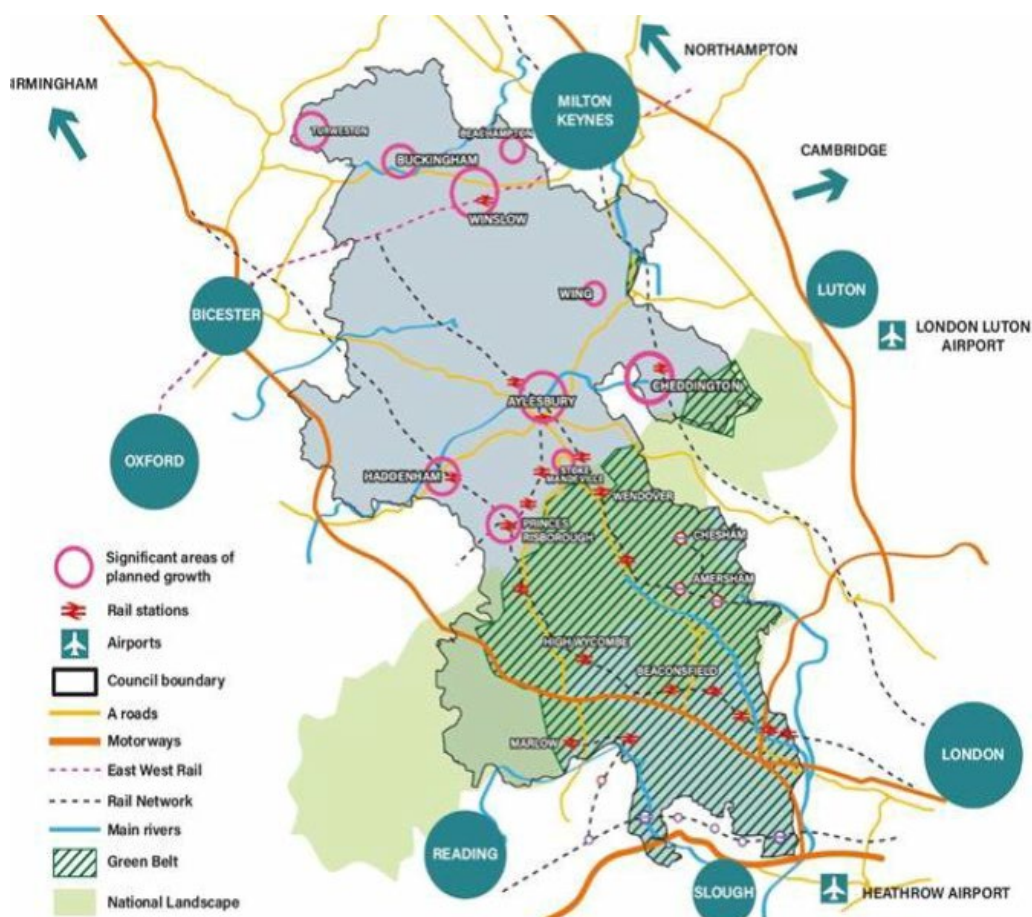
Supply component	Constant or variable	Approx. # homes in the plan period
Completions & commitments	Constant	24,982
Windfall	Constant	10,438
Part commitments	Constant	3,339
Town centre sites	Constant	4,594
NESS sites	Variable	Between 16,567 and 26,697
Other sites (non-Green Belt)	Constant	21,243
Other sites (Green Belt)	Variable	Between 0 and 4,000

5.5. Reasonable growth scenarios

- 5.5.1. The final task is to combine constants and variables to form reasonable alternative (RA) growth scenarios for appraisal and consultation, with considerations as follows:
- The lowest feasible growth scenario would involve supply from the constants (64,596 homes) plus 16,567 homes from NESS sites leading to a total supply of 81,196 homes. This is an unreasonable scenario in the context of LHN (91,000 homes).
 - The highest feasible growth scenario would involve supply from the constants plus 26,697 homes from NESS sites and 4,000 homes from Green Belt sites leading to 95,293 homes in total. This is a reasonable scenario for appraisal and consultation.
 - All of the intermediate scenarios are arguably reasonable but there is a need for pragmatism given the number of feasible scenarios. Firstly, there is a need to test the emerging proposed approach, which involves 26,697 homes from NESS sites and 0 homes from Green Belt sites. Secondly, it is reasonable to test four further scenarios where each would involve allocation of three out of the four variable NESS sites alongside 4,000 homes from Green Belt sites.
- 5.5.2. This leads to **six reasonable growth scenarios**, as set out in Table 2.3. Figure 5.2 shows the key diagram for the current Proposed Submission Local Plan, such that it shows **Scenario 1** and, in comparison to Scenario 1: **Scenarios 2 to 5** involving removing one NESS site and adding indicative Green Belt omission sites (4,000 homes); whilst **Scenario 6** involves adding the indicative Green Belt omission sites.
- 5.5.3. Also, note that Table 2.3 includes a row for 9 categories of new proposed allocations, i.e. allocations over and above those that are fully committed (A1, A2, etc).
- 5.5.4. The six scenarios are considered to represent the ‘reasonable alternatives’ in light of the process set out across this section of the report (Section 5) read as a whole. The requirement to present “an outline of the reasons for selecting the alternatives” has been met and, as part of this, steps have been taken to arrive at an appropriate number of scenarios supportive of an accessible and engaging consultation. Given the objective of defining growth scenarios in the form of alternative key diagrams – as opposed to high level spatial strategy alternatives not grounded in the reality of the specific sites that are available and in contention for allocation, and the latest evidence that is in place to support the Proposed Submission Plan – there are many conceivable alternatives, but it is not realistic to define, appraise and consult upon all conceivable alternatives. When defining reasonable alternatives there is invariably a need to apply discretion and planning judgement, but that is not to say that the growth scenarios that have been defined cannot be questioned and, indeed, interested parties are welcome to put forward further growth scenarios, accounting for the process set out above.

Table 5.3: The RA growth scenarios (constants greyed-out)

Supply component	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6
Completions & commitments	24,982	24,982	24,982	24,982	24,982	24,982
Windfall	10,438	10,438	10,438	10,438	10,438	10,438
A1 Part commitments	3,339	3,339	3,339	3,339	3,339	3,339
A2 Town centre sites	4,594	4,594	4,594	4,594	4,594	4,594
A3 Constant NESS sites	16,567	16,567	16,567	16,567	16,567	16,567
A4 Cheddington NESS site	3,650	0	3,650	3,650	3,650	3,650
A5 Beachampton NESS site	3,200	3,200	0	3,200	3,200	3,200
A6 Stoke Mandeville NESS site	1,650	1,650	1,650	0	1,650	1,650
A7 Wing NESS site	1,630	1,630	1,630	1,630	0	1,630
A8 Other sites (non-Green Belt)	21,243	21,243	21,243	21,243	21,243	21,243
A9 Other sites (Green Belt)	0	4,000	4,000	4,000	4,000	4,000
Total supply 2024-2045	91,293	91,643	92,093	93,643	93,663	95,293
% over LHN (91,000)	0%	1%	1%	3%	3%	5%

Figure 5.3: Growth Scenario 1 (the Proposed Submission Local Plan Key Diagram)

6. Growth scenarios appraisal

6.1. Introduction

- 6.1.1. This section of the report presents an appraisal of the growth scenarios under the 'SA framework', which primarily comprises a list of 13 sustainability topics (see Section 3).
- 6.1.2. Section 6.2 provides an overview, including a summary appraisal 'matrix' with a column for each of the SA topics and a row for each of the scenarios. The subsequent sections then consider the scenarios under each of the 13 sustainability topics in turn.

6.2. Overview

- 6.2.1. The summary matrix is presented below, where each row aims to: **1)** rank the scenarios in order of performance (with a star indicating best performing, "=" used where it is not possible to differentiate, and "?" used where there is uncertainty); and then **2)** categorise performance in terms of 'significant effects' using **red** / **amber** / **light green** / **green**.²⁴
- 6.2.2. The appraisal shows a mixed picture, with all of the scenarios associated with pros and cons, which is a reflection of all six scenarios being 'reasonable'. It is for the Council and wider stakeholders / interested parties to weigh the pros and cons before deciding on which of the scenarios best represents sustainable development 'on balance'.
- 6.2.3. As part of this, account can be taken of the fact that Scenario 5 (the emerging preferred approach minus Wing NESS plus Green Belt sites) is ranked first under the most topic headings, and Scenario 6 (the emerging preferred approach plus Green Belt sites) is the only scenario predicted a 'significant positive' effect. However, it is important to be clear that this does not automatically mean that either Scenario 5 or Scenario 6 is appraised as performing best overall, because: A) the appraisal is undertaken with no assumptions made regarding the degree of importance ('weight') that should be assigned to each of the topics as part of decision-making (nor are the topics assumed to have equal weight); and B) numerous of the topic specific appraisal conclusions are open for debate.
- 6.2.4. The following bullet points provide a brief overview of topic-specific appraisal findings:
- Accessibility – it is not possible to differentiate between the scenarios and all of the scenarios perform reasonably well in terms of directing growth in line with community infrastructure issues and opportunities, e.g. with several new secondary schools.
 - Air / environmental quality – it is not clear that there are any major concerns, but there are a range of transport-related uncertainties across all of the scenarios.
 - Biodiversity – again it is not possible to differentiate between the scenarios, but in terms of biodiversity there are overall limited concerns across the growth scenarios.
 - Climate change adaptation – there are a number of sites that are a 'constant' across the scenarios that require further scrutiny in terms of flood risk, notably urban sites.
 - Climate change mitigation – it is not possible to differentiate between the scenarios, but across the scenarios the concern is a conflict with decarbonisation commitments.
 - Communities & health – directing growth to the Green Belt could risk challenges at certain settlements, and there is also a concern with transformational growth at Wing. Across the scenarios there are risks as this is the first consultation on a full draft plan. However, the baseline scenario is one involving piecemeal growth at pace.
 - Economy & employment – the proposed approach to employment land across the scenarios is strongly supported; there is a case for higher growth involving a focus on Green Belt sites; and the proposed NESS site at Wing has limited economic rationale.

²⁴ **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.

- Historic environment – constraints are widespread and Historic England has not provided comments. Three of the variable NESS sites are challenging.
- Homes – all of the growth scenarios should enable a housing requirement set at LHN over the plan period, but there would be a ‘stepped’ requirement. This suggests a case for additional sites able to deliver relatively early and sites in the Green Belt would likely also be associated with low delivery risk and strong development viability.
- Landscape – constraints are widespread but Cheddington NESS site stands-out.
- Land / resources – there would be significant loss of ‘best and most versatile’ agricultural land under all scenarios (but, again, the baseline is continued growth).
- Transport – much work has been completed but given the scale of the plan there are remain uncertainties at this stage. Two of the NESS sites stand out as questionable.
- Water – inherent uncertainties regarding water resources and wastewater treatment.

Table 6.1: Growth scenarios summary appraisal

	Scenario 1 Emerging proposed approach	Scenario 2 Minus Chedd'ton plus GB	Scenario 3 Minus B'ampton plus GB	Scenario 4 Minus Stoke Mandeville plus GB	Scenario 5 Minus Wing plus GB	Scenario 6 Plus GB
Accessibility	=	=	=	=	=	=
Air / env. quality	=	=	=	=	=	=
Biodiversity	=	=	=	=	=	=
Climate change adaptation	=	=	=	=	=	=
Climate change mitigation	=	=	=	=	=	=
Communities & health	★1	2	2	2	★1	3
Economy and employment	2	2	2	2	★1	★1
Historic environment	2	★1	★1	2	★1	2
Homes	3	2	2	2	2	★1
Landscape	2	★1	2	2	2	2
Soils / resources	=	=	=	=	=	=
Transport	2	2	★1	2	★1	2
Water	?	?	?	?	?	?

- 6.2.5. Having provided an overview of the appraisal, set out below is an explanation of the conclusion reached under each of the sustainability topic headings in turn.
- 6.2.6. With regards to appraisal methodology, further points to note are as follows:
- Variables – each of the appraisal narratives includes a particular focus on the differences between the scenarios, with a view to enabling an informed choice.
 - Constants – whilst the proposed allocations that are a ‘constant’ across the scenarios do not have a bearing on conclusions reached in terms of the differential performance of the scenarios, they do have a bearing on predicted ‘significant effects’.
 - Significant effects – there is a requirement to conclude on significant effects, but doing so is challenging and highly subjective. Views on significant effects are welcomed.
 - Assumptions – there is a need to make assumptions regarding how various development sites would be delivered. Account can be taken of site-specific proposals, but with caution including with a view to an unbiased appraisal.
 - Growth quantum – it is not always appropriate to conclude a preference for lower growth (Scenario 1) from an environmental perspective, despite inevitable localised impacts. This is because low growth could either result in: unmet housing needs (if the housing requirement is set at a figure below LHN) that could have to be provided for elsewhere within a constrained sub-region; or a housing supply trajectory that lacks robustness due to the lack of a sufficient supply buffer (i.e. sufficient supply over-and-above the housing requirement), leading to a risk of the Local Plan becoming out-of-date such that ‘the presumption in favour of sustainable development’ applies.
 - Limitations – it is inevitably the case that some evidence emerges late in the process of defining and appraising growth scenarios, such that there is limited potential to feed in. However, the local plan evidence base, as published, has fed in as far as possible.

6.3. Accessibility

Scenario 1 Emerging proposed approach	Scenario 2 Minus Cheddington plus GB	Scenario 3 Minus Beachampton plus GB	Scenario 4 Minus Stoke Mandeville plus GB	Scenario 5 Minus Wing plus GB	Scenario 6 Plus GB
=	=	=	=	=	=

- 6.3.1. There is support for strategic growth locations that can deliver community infrastructure alongside new homes and, indeed, Beachampton NESS site is proposed to deliver *two* secondary schools (as well as three primary schools, strategic greenspace and wider strategic community / green infrastructure to the benefit of new residents and potentially also existing nearby communities).
- 6.3.2. However, there is limited evidence available regarding issues and opportunities relating to existing community infrastructure capacity, particularly secondary and primary school capacity. This is perhaps most notably an issue for ‘non-ness’ allocations that are a constant across the growth scenarios (particularly at villages proposed higher growth), but at NESS sites there is a need to recognise that schools will take time to deliver, and across the Green Belt sites (Scenarios 2 to 6) secondary school capacity is known to be challenging in the Chalfonts / Gerrards Cross area. Iver / Iver Heath / Richings Park is a notable location in the Green Belt, where the SA Note (2026) stated:

“... there are numerous [shortlisted sites in the area]... As such, there is the possibility of piecemeal growth with opportunities missed to maximise infrastructure benefits. In turn, consideration might be given to a comprehensive long term growth masterplan for the entire south east sector of Buckinghamshire east of the A412, also acknowledging that this is a key area for employment land including data centres.”

- 6.3.3. Overall, there is support for the emerging proposed approach (Scenario 1), which has been informed by a Baseline Infrastructure Study (BIS) and a Settlements Review. Numerous strategic growth locations are supported, for example the SA Note (2026) discussed a case for directing strategic growth to Aylesbury and other settlements that are now a proposed focus of growth under Scenario 1. However, there are inherent uncertainties hence 'moderate or uncertain' positive effects are predicted.
- 6.3.4. It is then difficult to differentiate between the scenarios with certainty, with considerations including: A) Beachampton and Cheddington are large NESS sites that can deliver major new infrastructure but are located in rural areas and there are delivery risks; B) Stoke Mandeville is an accessible location; C) Wing benefits from an existing secondary school (and the site would deliver a primary school); and D) the Green Belt sites are all in relatively accessible locations, but schools capacity issues/opportunities are unknown.

6.4. Air / environmental quality

Scenario 1 Emerging proposed approach	Scenario 2 Minus Cheddington plus GB	Scenario 3 Minus Beachampton plus GB	Scenario 4 Minus Stoke Mandeville plus GB	Scenario 5 Minus Wing plus GB	Scenario 6 Plus GB
=	=	=	=	=	=

- 6.4.1. It is difficult to suggest significant air quality concerns in respect of the four variable NESS sites, and across the package of NESS sites overall (10 would be allocated under Scenarios 1 and 6), given no air quality management areas (AQMA) in the north of Buckinghamshire. However, in terms of wider environmental quality there is a need to consider traffic along rural roads and through villages, e.g. at Beachampton it is anticipated that there would be a need for significant road upgrades to avoid issues.
- 6.4.2. With regards to the Green Belt sites, whilst there is a case for directing growth to the south of Buckinghamshire in terms of the ability to minimise car dependency, it is also the case that road congestion is an issue and there are several AQMA in and around this area, most notably a blanket AQMA covering the Ivers and Richings Park area. Also, one of the assumed sites at Richings Park is adjacent to the M25, and at Beaconsfield three of assumed sites are adjacent to the M40 (and the other the A355).
- 6.4.3. A final consideration is growth in proximity to sources of noise pollution (potentially an issue with certain Green Belt sites) and odour pollution (under Scenario 1 there are 28 proposed allocations within a wastewater treatment odour buffer zone).
- 6.4.4. Overall, whilst it is not possible to differentiate between the scenarios with confidence, it is appropriate to flag a 'moderate or uncertain' negative effect across all scenarios, particularly given transport-related uncertainties. The majority of the locations where the SA Note (2026) flagged a concern are now proposed low growth, but the discussion of problematic traffic through the centre of Buckingham is of note, including given uncertainties regarding the potential to deliver strategic transport solutions.

6.5. Biodiversity

Scenario 1 Emerging proposed approach	Scenario 2 Minus Cheddington plus GB	Scenario 3 Minus Beachampton plus GB	Scenario 4 Minus Stoke Mandeville plus GB	Scenario 5 Minus Wing plus GB	Scenario 6 Plus GB
=	=	=	=	=	=

- 6.5.1. There is broadly support for strongly weighting growth towards the north of Buckinghamshire and also to strategic growth locations well placed to deliver onsite strategic green/blue infrastructure to include SANG where necessary.

- 6.5.2. All four of the variable NESS sites have limited biodiversity constraint, and the potential to realise targeted opportunities can be envisaged at certain of the sites, including relating to river/stream corridor enhancements at Beachampton (potentially a considerable opportunity, in collaboration with Milton Keynes) and Wing.
- 6.5.3. Most of the shortlisted Green Belt sites that feature under Scenarios 2 to 6 have limited biodiversity constraint, but a potential issue is significant growth (potentially approaching ~1,500 homes) in the vicinity of Burnham Beeches SAC. It is anticipated that the site at Burnham located closest to the SAC would deliver onsite SANG (which might help to address *existing* recreational pressure), but other sites would make a financial contribution rather than delivering new SANG. This includes a larger site at Stoke Poges, which is a village located in proximity to Burnham Beeches and more broadly centrally located within a landscape (north of Slough) that is sensitive in biodiversity terms (including noting Stoke Common SSSI).²⁵ Furthermore, this site comprises former parkland, such that there may be a degree of site-specific biodiversity value.
- 6.5.4. Overall, it is not possible to differentiate between the growth scenarios with confidence, and 'neutral' effects are predicted. Whilst there are no headline biodiversity concerns (including drawing upon consultation responses received to date from key stakeholder organisations), and most of the sites where a concern was raised in the SA Note (2026) are now not being taken forward, there is limited evidence of growth being directed with a view to aligning with the objectives of the Buckinghamshire LNRS (2026).

6.6. Climate change adaptation

Scenario 1 Emerging proposed approach	Scenario 2 Minus Cheddington plus GB	Scenario 3 Minus Beachampton plus GB	Scenario 4 Minus Stoke Mandeville plus GB	Scenario 5 Minus Wing plus GB	Scenario 6 Plus GB
=	=	=	=	=	=

- 6.6.1. Flood risk is typically a primary climate change adaptation consideration when considering local plan growth scenarios and this is the case for the Buckinghamshire Local Plan, albeit there are also wider considerations including planning for future heat waves (the focus on NESS sites is supported in this regard, but proposed high densities in urban areas can be questioned).
- 6.6.2. Across all of the variable sites there is likely good potential to masterplan and deliver onsite sustainable drainage systems (SuDS) to address any issues relating to onsite and offsite flood risk; however, land north of Slough is a broad area of constraint given a network of rivers / streams and surface water flow paths that flow south towards Slough, where flood risk within the urban area is a significant issue.
- 6.6.3. Overall, whilst it is not possible to differentiate between the scenarios with confidence, it is appropriate to flag a 'moderate or uncertain' negative effect across all scenarios given that some sites do intersect a flood zone and the Environment Agency is yet to comment on sites (no response was received at the sites engagement stage).

²⁵ The SA Note (2026) stated: "... with regards to the south of Buckinghamshire, the belt of land between Cliveden and Iwer Heath via Stoke Poges is associated with a very significant concentration of ancient woodland and heathland habitats, and then to the northeast are the corridors of the Alder Bourne and the River Misbourne – both important chalk streams – and their confluences with the River Colne (itself a highly significant asset). Also, it is important to note that bat foraging is a 'landscape scale' constraint across this area. However, there are also some areas of lower / limited constraint, notably around Iwer and Rithings Park but also elsewhere directly around the edge of Slough (assuming SANG capacity). Taking sub-areas in turn: • West – there is support for the modest potential supply, but a large site option at Burnham is of note. Here the landowner / promoter has developed an initial concept masterplan that does include a significant new area of parkland, but there would be a need for further work to confirm that this meets the standards required of SANG. • Farnham Royal/Common – two small sites include significant priority habitat. • The Ivers and Rithings Park – there is significant potential supply which mostly generates limited biodiversity concerns, but expansion to the west of Iwer Heath would be adjacent to Black Park (where there are two SSSIs, but also extensive accessible greenspace that is not nationally or locally designated). • Land in the vicinity of the M40 / A413 junction – the significant employment land options in this area are closely associated with the three aforementioned river corridors along which there are four SSSIs in total (some not currently in a favourable condition)."

- 6.6.4. A particular issue is urban sites intersecting a flood zone that are proposed for high density development, although there is typically good potential to mitigate risk through design (e.g. ground flood uses) and wider measures, including safe access and egress in the event of a flood. In particular, there are clusters of challenging sites in High Wycombe and Chesham, which relates to the nature of the town centres as being closely associated with rivers (the Wye and the Chess) and steep Chilterns topography.

6.7. Climate change mitigation

Scenario 1 Emerging proposed approach	Scenario 2 Minus Cheddington plus GB	Scenario 3 Minus Beachampton plus GB	Scenario 4 Minus Stoke Mandeville plus GB	Scenario 5 Minus Wing plus GB	Scenario 6 Plus GB
=	=	=	=	=	=

- 6.7.1. Focusing on built environment decarbonisation, arguably a key consideration is directing growth to locations with strong development viability that are well placed to deliver 'net zero development' (or otherwise achieve energy/emissions standards beyond the requirements of Building Regulations) and, in this regard, there is support for Scenarios 2 – 6 that involve higher growth including growth directed to Green Belt sites.
- 6.7.2. With regards to NESS sites, schemes of this scale can face viability challenges given infrastructure costs, but are also typically highly scrutinised flagship schemes that can be masterplanned and designed with a strong focus on built environment decarbonisation, potentially to include masterplanning for energy infrastructure.
- 6.7.3. This discussion suggests support for Scenario 6, as it would involve the strongest focus on sites that are well placed to deliver on per capita built environment decarbonisation ambitions. However, there major uncertainties in respect of transport decarbonisation, which suggests a need to caution against higher growth.
- 6.7.4. Overall, it is not possible to differentiate between the scenarios with confidence, and it is appropriate to flag a risk of 'moderate or uncertain' negative effects given the urgency of built environment decarbonisation / the stretching nature of committed targets.

6.8. Communities and health

Scenario 1 Emerging proposed approach	Scenario 2 Minus Cheddington plus GB	Scenario 3 Minus Beachampton plus GB	Scenario 4 Minus Stoke Mandeville plus GB	Scenario 5 Minus Wing plus GB	Scenario 6 Plus GB
1	2	2	2	1	3

- 6.8.1. Whilst there are numerous issues and opportunity to consider, the appraisal reflects a view that: A) there is likely a concern with growth within the Green Belt, given this is a densely populated part of Buckinghamshire with concerns around loss of countryside and erosion of settlements gaps, including noting recently permitted sites and pending planning applications; and B) there is a need to carefully consider the proposal for transformative growth at Wing, including with a focus on avoiding problematic traffic congestion through the village.
- 6.8.2. With regards to significant effects, there is a clear need to flag a concern at this stage recognising that this is the first opportunity that communities have had the chance to comment on a full draft plan. However, numerous aspects of the plan are strongly supported, including setting a clear framework for town centre regeneration in Aylesbury, High Wycombe and Chesham, building upon adopted Regeneration Strategies.

6.9. Economy and employment

Scenario 1 Emerging proposed approach	Scenario 2 Minus Cheddington plus GB	Scenario 3 Minus Beachampton plus GB	Scenario 4 Minus Stoke Mandeville plus GB	Scenario 5 Minus Wing plus GB	Scenario 6 Plus GB
2	2	2	2	1	1

- 6.9.1. Employment land needs would be provided for in full across all of the scenarios, and in some regards there is a good mix of sites, notably: there is a clear case for new employment land at Winslow given EWR and more broadly a location within the Oxford to Cambridge Corridor; Long Crendon is linked to the M40, Thame (where there is significant employment land) and Haddenham (a proposed strategic growth location); at Princes Risborough there is limited current employment land such that there is support for new employment land to compliment housing growth; and Finemere Aerodrome is located on the A421, which is a strategic road linking the M1 and M40. However, there is a degree of concern regarding over-reliance on one major site, namely Westcott (between Aylesbury and Bicester), where transport connectivity is challenging.
- 6.9.2. Further considerations are: A) there is a case for local plan-led growth in the south of Buckinghamshire from an employment land perspective (both in terms of new homes and new employment land); B) whilst there is an economic rationale for most of the NESS sites (both those that are a 'constant' and those that are a 'variable') this is least the case for Wing; and C) in the south of Buckinghamshire there is extensive interest in new data centres, which leads to a risk of undermining this sector of the Green Belt in combination with housing growth (including noting pending speculative applications).
- 6.9.3. Finally, at one of the shortlisted Green Belt sites (Scenarios 2 to 6), namely that located to the east of Stoke Poges, includes a significant hub of existing offices, and the current planning application explains: *"The built form includes several modern office and 'institutional' blocks formerly occupied by Glaxo and later GEC, Hitachi, Servier, Urenco and Siemens together with ancillary structures such as the gatehouse and maintenance buildings. The latter 3 companies remain in occupation but in the case of Urenco and Siemens, their tenure is coming to an end and with it, the vacation of buildings. In fact, the Urenco building is already vacated."* The proposal is to deliver 350m² of office space as part of the redevelopment, but it seems likely that there could be a net loss.

6.10. Historic environment

Scenario 1 Emerging proposed approach	Scenario 2 Minus Cheddington plus GB	Scenario 3 Minus Beachampton plus GB	Scenario 4 Minus Stoke Mandeville plus GB	Scenario 5 Minus Wing plus GB	Scenario 6 Plus GB
2	1	1	2	1	2

- 6.10.1. Historic environment constraint is widespread across Buckinghamshire and so there is a need to predict a 'moderate or uncertain' negative effect ahead of consultation with Historic England (who were not able to comment at the sites engagement stage).
- 6.10.2. A number of the shortlisted Green Belt sites are subject to notable constraint, but on balance the ranking of the scenarios reflects particular concerns with the Cheddington, Beachampton and Wing NESS sites. There are significant constraints affecting these sites, albeit also good potential to avoid/mitigate via masterplanning. Focusing on the Beachampton NESS site, the SA Note (2026) stated:

“... located between four village conservation areas and is connected by rural lanes. The site relates most closely to Whaddon, which is a distinct hill top village with a grade 1 listed church, and which gives its name to the Whaddon Chase woodlands (former hunting forest). Also, to the south of Whaddon is a committed strategic urban extension (Shenley Dens) and there is now a Cat1 site that would deliver an extension. Finally, and more broadly, this is the eastern extent of a broad landscape between likely strategic growth areas where there is a significant density of historic villages. In the east is the raised ground of Whaddon Chase and then, to the west, is a network of villages associated with stream corridors.”²⁶

- 6.10.3. With regards to the shortlisted Green belt sites, perhaps a primary consideration relates to the possible expansion of Burnham, as this is a broadly sensitive area not well linked by road, with the Burnham Conservation to the east, an important cluster of assets including a Grade I listed church at Hitchambury to the west and then, further to the west, a sensitive broad landscape including Taplow and Cliveden. There is certainly a need to carefully consider expansion of the settlement edge towards Hitchambury, but the vision of the site promoter is for an extensive greenspace buffer, which might ensure containment, plus there could be potential to enhance appreciation of heritage assets. Further considerations are: A) the site at Stoke Poges comprises former parkland, which can be appreciated from footpaths, and includes a Grade II listed former manor house, but the manor house has been used for offices (it is understood to now be vacant) and there are other office buildings surrounding it; B) on the northern edge of Slough the shortlisted site is adjacent to a Grade II Registered Park and Garden and a cluster of listed buildings, but there could be good potential for avoidance / mitigation; D) at Beaconsfield the sites are clustered in the vicinity of the valued historic town centre, such that there is a need to ensure a strategic approach to growth including from an access and traffic perspective, but it is not clear that there are any major concerns; west of Chalfont St Giles sensitivity is limited assuming access from Narcot Lane; and E) at Gerrards Cross the site is adjacent to the conservation area, but is well-contained.

6.11. Homes

Scenario 1 Emerging proposed approach	Scenario 2 Minus Cheddington plus GB	Scenario 3 Minus Beachampton plus GB	Scenario 4 Minus Stoke Mandeville plus GB	Scenario 5 Minus Wing plus GB	Scenario 6 Plus GB
3	2	2	2	2	1

- 6.11.1. Under Scenario 1 (the emerging proposed approach) total plan period supply does not exceed local housing need (LHN) and there would be a need for a heavily ‘stepped’ housing requirement, i.e. the requirement would be set significantly below LHN in the early years of the plan period and then commensurately above LHN in the latter years of the plan period. As such, there is clear support for Scenario 6, which is a higher growth scenario involving additional allocation of Green Belt sites that will tend to be able to deliver in the earlier years of the plan period (and will tend to have strong viability such that they are well placed to deliver affordable housing, e.g. 50%, alongside delivering on wider policy asks associated with a cost / viability implications).
- 6.11.2. Boosting supply in the earlier years of the plan period could allow for the housing requirement over these years to be increased (i.e. the extent of the stepped requirement reduced) and/or could help to ensure that there is a robust supply ‘headroom’ over-and-above the housing requirement, as a contingency for delivery issues and ultimately with a view to a robust supply (i.e. one whereby there is confidence that the Council can maintain a five year housing land supply and, in turn, is not faced with an out-of-date local plan and therefore planning applications decided under ‘the presumption’).

²⁶ In respect of Beachampton, the SA Note (2026) also noted the following analysis from the NESS Study: “Numerous multi-period metalwork finds indicate a concentration of Roman activity within the area, and archaeological works undertaken to the east, as part of the Whaddon development, have identified a previously unknown Roman settlement...”

- 6.11.3. Furthermore, there is a case for boosting supply to account for considerable delivery risks associated with the proposed supply, including: A) a focus on NESS sites that are inherently at risk of facing delivery challenges; B) a focus on challenging urban sites; and C) ambitious density and delivery assumptions across numerous sites. Water supply and wastewater treatment capacity is a further matter that leads to delivery risk (as is fairly unavoidable in the constrained south of England), but it is not clear that an appropriate response to this risk would be to boost supply from Green Belt sites.
- 6.11.4. Having made the case for boosting supply, the counter argument is that total supply under Scenario 1 will likely be higher by the time of submission, and even more so ahead of adoption, once account is taken for sites that have recently gained planning permission and sites that will gain planning permission over the coming months.²⁷
- 6.11.5. This being the case, it is judged appropriate to predict a 'moderate or uncertain' positive effect for Scenario 1, and then a 'significant' positive effect for Scenario 6 as there could be the potential to set the plan period housing requirement above LHN so as to make some provision for Slough's unmet need.
- 6.11.6. Further considerations are: A) the NESS sites are likely well placed to deliver a good mix of homes, the full policy quota of affordable housing (notwithstanding potential viability challenges), specialist housing and potentially Gypsy and Traveller sites (there can be delivery risk); B) maximising affordable housing delivery is typically a key priority for local plans and, in this regard, there is support for Green Belt allocations and there is a need to question the degree of focus on urban sites, including within Aylesbury where viability is challenging relative to other parts of Buckinghamshire (it is not uncommon for urban redevelopment sites to deliver zero affordable housing); and C) providing for Gypsy and Traveller accommodation needs is an issue under all of the growth scenarios, with the proposal to make numerous allocations but nonetheless to generate a significant unmet need. Point (C) is a key issue discussed further in Section 9.

6.12. Landscape

Scenario 1 Emerging proposed approach	Scenario 2 Minus Cheddington plus GB	Scenario 3 Minus Beachampton plus GB	Scenario 4 Minus Stoke Mandeville plus GB	Scenario 5 Minus Wing plus GB	Scenario 6 Plus GB
2	1	2	2	2	2

- 6.12.1. Whilst the proposal is to avoid/minimise growth within the Chilterns National Landscape (CNL), and the proposal is to maximise growth within urban areas as far as reasonably possible, there are nonetheless a range of concerns across the growth scenarios.
- 6.12.2. Focusing on the sites that are a variable, key considerations are: A) Cheddington is somewhat sensitive in respect of views from Ivinghoe Beacon, including views towards Mentmore towers, although the views are at some distance and there is likely good potential to minimise/mitigate impacts through masterplanning including taking careful account of variations in topography and screening (but there is a lack of certainty regarding the containment of growth, and specifically a risk of further growth east of the village); B) whilst there are landscape sensitivities associated with the other variable NESS sites there is good potential for mitigation and enhancement via delivery of strategic greenspace (this includes South of Stoke Mandeville, albeit acknowledging this is a sensitive site that is visible from Coombe Hill); and C) whilst there is a general concern regarding loss of valued countryside and settlement separation in the south of Bucks, the shortlisted Green Belt sites mostly have limited landscape constraint.

²⁷ The cut-off date for accounting for planning permissions was 31st March 2025. Sites that have gained or will gain planning permission after this date are not currently accounted for within the local plan supply where they are not an allocation.

6.12.3. Maintaining a focus on the shortlisted Green Belt sites, specific considerations include: Richings Park (900 homes) – landscape sensitivity is likely overall quite low, but this is a sensitive sector of the London Green Belt; Burnham (800 homes) – the potential for a scheme that relates reasonably well to the settlement edge and delivers strategic greenspace to secure containment, but there is a need to guard against sprawl westwards towards Taplow / Maidenhead and downhill towards the Thames, including noting some sensitive views in this area across the Thames valley; High Wycombe (Holmer Green) (500 homes) – the sites relate well to the built form and there is a case for comprehensively planning for growth across that part of the Holmer Green Plateau that falls outside of the CNL, including aimed at avoiding/minimising CNL impacts and potentially bringing some benefits, e.g. improved walking/cycling connectivity; Chalfont St Peter (300 homes) – the sites are well contained but accessed from an important lane that links Chalfont St Peter to Denham (likely an important cycle route); Stoke Poges (350 homes) – there is a need to ensure comprehensive rather than piecemeal growth here, given the sensitivity of the Green Belt / settlement separation north of Slough, and consideration might be given to accessible greenspace that allows for appreciation of the former parkland (although there are currently footpaths through the area); Iwer (300 homes) – this is a sensitive part of the Green Belt, and development would erode settlement separation, but the sites are quite well contained; to the north the site is accessed from lanes associated with the Colne Valley Trail, whilst to the south a consideration is the adjacent Grand Union Canal (Slough Arm); Beaconsfield (250 homes) – the sites are well-contained and not easily appreciated, but there is a need to ensure a strategic approach to growth within the arc of land surrounding the Old Town; Chalfont St Giles (220 homes) – to the south there is a need to guard against sprawl towards Chalfont St Peter (the potential for green infrastructure enhancements might be envisaged, noting assets to the east) and to the east the site relates well to the built form but this is a distinctly sensitive gap to Chalfont St Peter, for example noting the Chiltern Way and also a site at Chalfont St Peter recently granted permission for 975 homes (which sits within a larger site that was examined through the NESS, as discussed); Slough/Langley (200 homes) – there are a range of land uses in the area which might assist with containment but also could hinder effective linking of the site to Slough; Iwer Heath (150 homes) – whilst landscape sensitivity is likely quite low, this is a sensitive area in Green Belt terms, and there is a need to ensure a strategic approach to growth, including potentially with a focus on delivering strategic green infrastructure; Gerrards Cross (50 homes) – the site is adjacent to the A40 and relates well to settlement edge.

6.12.4. Finally, the following bullet points consider some of the ‘constants’:

- NESS sites – the SA Note (2026) discussed NESS sites in an order of preference, in terms of landscape sensitivity, accounting for the analysis in the NESS Stage 2 study, and from this analysis it can be seen that landscape sensitivity has fed into the final selection of NESS sites for allocation (including noting that at Princes Risborough the proposal is now to only densify the existing allocation, albeit there are still tensions between densification and views from Whiteleaf Hill). However, the analysis does flag Haddenham NESS site as constrained. There is a need for ongoing scrutiny of the vision, ensuring a suitably ‘landscape-led’ approach and avoiding the risk of sprawl.

From the SA Note (2026) it is also noted that the Aylesbury NESS site was flagged as somewhat constrained by the Stage 2 NESS study, but there is considered to be a good opportunity to comprehensively plan for Aylesbury’s expansion as far as the River Thame (along with extensive riverside strategic greenspace). Finally, whilst Turweston NESS site was identified as low constraint, concerns were then raised by West Northants Council through the consultation (as discussed in Section 5.3).

- Smokey Row / Little Kimble – whilst there is a strategic case for growth in this area given good transport connectivity and potentially opportunities relating to improving connectivity and developing a new community (e.g. with a primary school), this is a sensitive area in landscape terms given prominence in views from Beacon Hill, which is one of the most popular viewpoints along the Chilterns escarpment. Growth here should be considered in combination with growth north of Princes Risborough, given expansive views from the CNL / Ridgeway, and it can also be noted that a sensitive site west of Longwick is now not proposed for allocation (as discussed in Section 5.4).

- South Milton Keynes – there is a need to guard against sprawl towards Stoke Hammond, including noting the river/canal corridor and heritage assets. Also, to the south west of Milton Keynes there is a need to consider the importance of the Whaddon Chase woodlands (a key assets in the north of Buckinghamshire).
- Cheddington, Ivinghoe, Pitstone and Marsworth – these villages should be considered in combination given a rural landscape in the context of the nearby Chilterns escarpment, but concerns focus on Cheddington, which is a focus of strategic growth. At Pitstone a sensitive site from the sites engagement stage is now not allocated.
- Winslow – the proposal is not to allocate a large site to the west, with the SA Note (2026) having stated: *“there is a need to carefully consider expansion to the west and east (Cat 1) noting that the land falls away... towards the Claydon Brook.”*
- Villages in the north of Buckinghamshire – it is difficult to comment on sensitivities given the available evidence. The SA Note (2026) stated: *“... sites are mostly well related to the settlement edge and well contained by strong features. At Padbury one of the site options would use only part of a field, i.e. would not draw upon a field boundary for containment such that there could be a risk of sub-optimal creep...”*
- Sites in the CNL – the proposal is to avoid major development in the CNL, which contrasts to the Wycombe Local Plan that allocated 12 major sites in the CNL. At Stokenchurch there is a case for new employment land given a junction onto the M40, but the two sites considered at the sites engagement stage are now not allocated.

6.13. Soils / resources

Scenario 1 Emerging proposed approach	Scenario 2 Minus Cheddington plus GB	Scenario 3 Minus Beachampton plus GB	Scenario 4 Minus Stoke Mandeville plus GB	Scenario 5 Minus Wing plus GB	Scenario 6 Plus GB
=	=	=	=	=	=

- 6.13.1. The majority of the variable NESS sites are likely associated with agricultural land that is classified as ‘best and most versatile’ (BMV), albeit the lowest grade of BMV land (grade 3a). Beachampton is potentially the exception, in that the available national data set shows the site to comprise a mix of grade 3a (BMV) and 3b (not BMV) quality land, but this nonetheless appears to be productive agricultural land.
- 6.13.2. In the south of Buckinghamshire the great majority of land that is not woodland is BMV and there is a significant concentration of grade 2 quality land to the north and east of Slough. However, a number and potentially the majority of the shortlisted Green Belt sites are not in productive agricultural use, for example the site at Stoke Poges comprises parkland / former parkland and at Richings Park the large site to the north (adjacent to Iver Station) comprises former landfill.
- 6.13.3. In the far south of Buckinghamshire it is also important to note the extent of minerals deposits, as evidenced by the extent of current and former quarries, but it is not clear that sterilisation of minerals resources is a key issue for any of the shortlisted sites.
- 6.13.4. Overall, it is difficult to differentiate between the growth scenarios with confidence, including recognising that Buckinghamshire does not stand-out as more constrained than neighbouring areas in respect of agricultural land quality, but it is appropriate to flag a concern regarding significant loss of BMV land across all of the scenarios.

6.14. Transport

Scenario 1 Emerging proposed approach	Scenario 2 Minus Cheddington plus GB	Scenario 3 Minus Beachampton plus GB	Scenario 4 Minus Stoke Mandeville plus GB	Scenario 5 Minus Wing plus GB	Scenario 6 Plus GB
2	2	1	2	1	2

- 6.14.1. This is a crucially important issue for most local plans, and the Buckinghamshire Local Plan is no exception. There is a clear transport case for the majority of the NESS sites (albeit also inherent risks ahead of further detailed work regarding the deliverability of required major infrastructure upgrades), but this is least the case for two that are a variable across the scenarios, namely Beachampton (which is connected by minor roads) and Wing (as a smaller scheme at a village with a limited offer, where it appears that traffic would need to pass through the village to reach the A418, and where there is unlikely to be good bus or cycle connectivity to higher order settlements). Also, Cheddington NESS site has poor road connectivity albeit a well-connected station.
- 6.14.2. With regards to the Green Belt sites (Scenarios 2 to 6), the south of Buckinghamshire is broadly an area with good transport and accessibility credentials, but modelling work has not been undertaken to consider the impacts of growth on what is a congested road network. A number of the shortlisted sites are potentially challenging in terms of access / linking to the strategic road network, notably sites at Burnham, Chalfont St Peter, Iver (the site to the north) and Beaconsfield (the site to the south east). The sites at Beaconsfield and Gerrards Cross are associated with good potential to walk to a town centre and a rail station (with a good service), and at High Wycombe the sites are located at the periphery of the town, and there is steep topography, but there is nonetheless a case for growth in transport and accessibility terms.
- 6.14.3. With regards to 'constant' allocations, key considerations include:
- Buckingham NESS (lack of a rail station and uncertainty regarding the strategic road network and traffic through the town centre);
 - Westcott strategic employment area (rural but with bus connectivity potential);
 - Haddenham NESS (a need to consider connectivity notwithstanding a rail station, including noting growth at nearby villages, Thame and Aylesbury); and
 - Sites distributed across villages where there is limited transport case for growth.
- 6.14.4. Aylesbury and Winslow are good examples of vision-led transport planning, but in some other areas it is less clear that growth is distributed with a focus on delivering benefits to transport infrastructure and services, including delivering priority cycle routes (LCWIP) and maintaining / enhancing bus services (see analysis in the SA Note, 2026). Having said this, it is important to note that the final decision on NESS sites to support was strongly influenced by transport connectivity (see analysis in the SA Note, 2026), notably with the decision taken not to allocate Calvert and Steeple Claydon, which perform poorly in transport terms on the assumption that major rail upgrades are not deliverable.
- 6.14.5. Finally, planning to 2045 via numerous large strategic sites can be questioned in the knowledge that future local plan-making will likely be in the context of a Spatial Development Strategy (SDS) for the Thames Valley that will be well placed to direct strategic growth with a strong focus on ensuring that growth strategy aligns with vision-led transport planning principles. The focus might alternatively be on planning for a 15 year plan period from adoption with a spatial strategy weighted more to smaller sites.
- 6.14.6. Overall, at this stage, and recalling that this is the first time that a full draft of the plan has been published for consultation, there is a need to conclude a 'moderate or uncertain' negative effect.

6.15. Water

Scenario 1 Emerging proposed approach	Scenario 2 Minus Cheddington plus GB	Scenario 3 Minus Beachampton plus GB	Scenario 4 Minus Stoke Mandeville plus GB	Scenario 5 Minus Wing plus GB	Scenario 6 Plus GB
?	?	?	?	?	?

6.15.1. A Stage 2 Water Cycle Study (WCS) was recently finalised and presents an assessment of the plan (Scenario 1) under headings that include:

- Water resources and supply – five Water Resource Zones (WRZs) cover Buckinghamshire and in four cases the growth factored into the Water Resources Management Plan (WRMP) is significantly less than the growth under Scenario 1 (up to a 39% difference for the WRZ covering the north of Buckinghamshire). The WCS recommends that: *“water companies feedback to Buckinghamshire if there are concerns that Local Plan growth will cause a supply-demand deficit...”*
- Wastewater treatment – of the 46 treatment works only 15 have capacity to take the growth planned (Scenario 1), which is only 3% of the overall housing growth. At the other WwTWs upgrades are likely to be needed at some point during the plan period. The WCS recommends: *“Consideration therefore needs to be given to how development is phased... [to] provide time for additional capacity to be provided... Engagement with water companies is essential to inform both the phasing of sites and plans to upgrade infrastructure. In many of the catchments, the WwTW served both Buckinghamshire and neighbouring authorities...”*²⁸
- Wastewater network and storm overflows – 17 network storm overflows and 24 storm tanks at treatment works in Buckinghamshire exceeded ten operations per year over 2023 to 2025. Poorly performing storm overflows include Tingewick, Whaddon and Steeple Claydon. Development in these locations will require upgrades and, again, the WCS recommends early engagement.
- The WCS presents modelling that suggests receiving watercourses may be sensitive to an increase in wastewater, which potentially impacts their ability to reach or maintain Good Ecological Status, as required under the European Water Framework Directive.

6.15.2. There are clearly a range of challenges, which is a very common situation for local plans in the south of England. Matters relating to water quality and water resources (water supply and the water levels affecting the water environment) are high on the national agenda at the current time. There are typically solutions, but these take time and come at a cost, such that there is a need to minimise issues through strategy and site selection, and carefully consider implications for the phasing of growth and, in turn, the plan period housing supply/requirement (recognising that growth under the presumption in favour of sustainable development makes it particularly difficult to plan for water).

6.15.3. The water companies are unable to provide certainty regarding infrastructure upgrades later in the plan period, which suggests the need for a precautionary approach. It is noted that there is currently a major programme of water supply infrastructure upgrades ongoing in Buckinghamshire, with the Local Plan proposing to safeguard sites in support of two sub-regional projects, namely the Grand Union Canal Transfer Project (aimed at addressing issues in Hertfordshire and Northwest London) and the Thames to Affinity Transfer Project (a proposed water transfer from Thames Water to Affinity Water). This serves to highlight the scale of water infrastructure challenges.

²⁸ The current plan document further explains: *“There are 73 wastewater treatment works within or serving Buckinghamshire, 41 of which are likely to be close to (including Haddenham), or to have exceeded their flow permit by the end of the Local Plan period (2045) (including Aylesbury, Buckingham, Long Crendon, Princes Risborough, Slough, Steeple Claydon and Winslow). Future development in these locations is likely to require an increase in permit limits and /or upgrades to treatment capacity. This will have implications for delivery lead in time, and may delay some sites later in the plan period.”*

- 6.15.4. With regards to the alternative scenarios, it is very difficult to confidently differentiate between them on the basis of the analysis in the WCS. There are known to be challenges in the north of Buckinghamshire, and the south is known to be sensitive due to an internationally important network of aquifer-fed chalk streams. Wastewater treatment at Beachampton is known to be a stand-out issue, but the scale of growth is such that there will likely be a solution (in time and at a cost, which must factor in).
- 6.15.5. Water efficiency in new developments is a further key consideration, and it is noted that the proposal is to require: *“All new dwellings are required to achieve a water efficiency standard of 85 litres per person per day.”* This is an ambitious standard that has factored into viability assessment work alongside other policy requirements with implications for build costs (i.e. to ensure that policy requirements in combination do not create a delivery risk). There can be particular opportunities to take innovative approaches at strategic sites, and a previous version of the WCS recommended requiring strategic sites to deliver as ‘water neutral’, also stating: *“Larger residential developments... should consider incorporating greywater recycling and/or rainwater harvesting... at the master planning stage in order to reduce water demand.”*
- 6.15.6. Final considerations are: A) the WCS discusses the importance of retrofitting Sustainable Drainage Systems (SuDS) in urban areas, which must factor in when considering development densities; and B) data centres can place significant pressure on water supply, hence there is a need for a strategic approach to planning for data centres in the south of Buckinghamshire, given the challenges flagged in the WCS.

7. The preferred growth scenario

- 7.1.1. Officers provided the following text to explain why Scenario 1 is ‘justified’:

“It is clear that there are challenges with Scenario 1, and arguments for supporting an alternative scenario, but supporting Scenario 1 as the proposed submission approach is nonetheless considered justified, in that Scenario 1 represents “an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence” (NPPF para 36).

A key message to come out of the appraisal is that there are arguments for directing higher growth to the south of Buckinghamshire, but this would involve Green Belt release, and there are not considered to be the ‘exceptional circumstances’ to justify any such approach. Specifically, this is the case because under Scenario 1 it will be possible to set the housing requirement at LHN over the plan period (albeit with a stepped requirement), and the proposed strategy is considered to perform suitably well in terms of key objectives, and ultimately to represent sustainable development. There is considered to be a good spread and mix of sites, including having accounted for commitments (which includes sites in the Green Belt). This includes making best use of PDL and supporting higher densities, particularly in town centres (in support of Regeneration Strategies) and at locations in proximity to a well-connected station.

The appraisal also flags certain concerns with NESS sites that are a ‘variable’ across the growth scenarios (less so South of Stoke Mandeville, albeit there are certain challenges with this site including given the scale of growth in the vicinity, ongoing HS2 construction and visibility of this area from the Chilterns escarpment). However, all 10 of the NESS sites are ultimately considered to be ‘justified’ and the Council favours directing growth to large strategic-scale sites that are well placed to deliver new and upgraded infrastructure alongside new homes.

Finally, it is recognised that there is a case for supporting Scenario 6 because this could potentially (subject to future work to revisit the total supply in light of updated monitoring data on housing completions and commitments) enable the Local Plan to make some provision for unmet need from Slough. However, given progress with the Slough Local Plan, and also the Royal Borough of Windsor and Maidenhead Local Plan, there is currently insufficient evidence to enable a conclusion to be reached regarding the quantum of unmet need that should or might be provided for in Buckinghamshire.”

Part 2: SA findings at this stage?

8. Introducing Part 2

- 8.1.1. This part of the report present an appraisal of the Proposed Submission Local Plan as a whole under the SA framework (i.e. under the same set of 13 topic headings used to structure the appraisal in Section 6). The appraisal essentially expands on the appraisal of growth scenario 1, including accounting for site-specific and wider DM policies.
- 8.1.2. Under each topic heading the aim is to reach a conclusion on the ‘significant effects’ of the Local Plan as a whole, which can involve confirming the conclusion reached for growth scenario 1, as appraised in Section 6. With regards to methodology, account is taken of the baseline situation (a significant effect is an effect *on the baseline*, which is not a static situation but one whereby growth would come forward without a Local Plan), and various potential effect characteristics. For example, there is a need to consider short and long term effects, direct and indirect effects and the cumulative effects of the Local Plan in combination with other policies and plans.

9. The Proposed Submission Plan

9.1. Introduction

- 9.1.1. Each of the topic specific appraisals is structured as follows:
- Strategy / sites / supply – recapping on the appraisal of growth scenario 1.
 - Strategic policies – the Local Plan begins by presenting 16 strategic policies.
 - Site-specific policies – the focus is on site-specific policies presented in the main plan.
 - Development management policies – a selective discussion is presented.
 - Conclusion – conclude on the significant effects of the Local Plan as a whole.
- 9.1.2. Finally, note that each appraisal begins by presenting the sustainability objective that underpins the sustainability topic in question (see Section 3).

9.2. Accessibility

Support accessibility to community infrastructure, including by delivering infrastructure enhancements, including strategic infrastructure that benefits existing as well as new communities ('planning gain').

Strategy / sites / supply

- 9.2.1. The appraisal in Section 6 is tentatively supportive of growth scenario 1, but there are a range of uncertainties including in respect of NESS sites (including due to potential delivery challenges, which could affect what the sites can deliver in terms of community infrastructure and place-making) and growth at villages.

Strategic policies

- 9.2.2. A number of the strategic policies are broadly supportive of accessibility objectives, but it is difficult to identify distinct policy choices / decisions that have been taken in response to local issues and opportunities, in the context of forthcoming national development policies (NDMPs; as proposed by the Draft NPPF, 2025).
- 9.2.3. The four policies relating to Town Centre Regeneration are broadly supported, but there is a need to confirm that the proposed high densities for town centre sites does not create challenges, e.g. in terms of infrastructure capacity (e.g. schools capacity).

Site-specific policies

- 9.2.4. Numerous site-specific policies set out clear requirements for onsite community infrastructure. Taking the Cheddington NESS site as an example:
- “Development must provide a comprehensive range of community infrastructure, including: a) Local centres providing retail and community uses as accessible focal points; b) Land and buildings for three primary schools (6-8 FE total); c) Land and buildings for one secondary school; d) On- site primary healthcare provision or contributions to off-site provision, as agreed with the Council and Integrated Care Board; e) Indoor and outdoor sport, recreation and play facilities in accordance with Policy SE5: Sport, Leisure and Recreation and relevant standards.”
- 9.2.5. It can be noted that the proposal is not only to make land available for schools, but also to provide buildings, i.e. to construct the school. Also, with regards to healthcare facilities, the Integrated Care Board may be able to provide further information on sites that are particularly supported on the basis that they will be well-placed to deliver a modern healthcare facility (e.g. an integrated care facility). Aylesbury NESS site is notable in that there is a firm requirement to deliver a facility onsite, specifically: “On-site primary healthcare facilities, delivered in partnership with the Integrated Care Board.”

DM policies

- 9.2.6. Policy IN2 (Healthcare and education infrastructure) is a key policy, setting out that:
- “Development proposing 10 or more dwellings will be required to provide healthcare and education infrastructure necessary to meet needs arising from the development, either through on-site provision of new or improved infrastructure or from contributions secured through planning obligations. Healthcare contributions will be calculated in accordance with the methodologies set out in Appendix O. Education contributions will be calculated using a robust and up-to-date methodology based on evidence of pupil yield, school capacity and cost of provision, consistent with...guidance.”

Conclusion

- 9.2.7. In conclusion, a **‘moderate or uncertain’ positive effect** is predicted. There is support for many aspects of the spatial strategy / supply, but there is a need for ongoing scrutiny of site-specific requirements from a viability / delivery perspective.

9.3. Air / env. quality

Take steps to locate, design and deliver new development so as to avoid worsening air pollution and support the achievement of air quality objectives, including within air quality management areas (AQMA).

Strategy / sites / supply

- 9.3.1. The appraisal in Section 6 flags a potential concern with growth scenario 1. Whilst air quality may not be a major issue, there are some wider concerns regarding road traffic affecting environmental quality.

Strategic policies

- 9.3.2. A key policy is SP10 (Infrastructure for transport, telecommunications, utilities, waste), but this is a focus of discussion below under the ‘transport’ topic heading.

Site-specific policies

- 9.3.3. Only one of the site-specific policies presented in the main report references air quality, namely Policy WHA02 (Land west of Shenley Park, Whaddon), where the requirement is: “An air quality and noise assessment shall be submitted to and approved in writing by the Council prior to development commencing.”

- 9.3.4. This site-specific requirement reflects the location of the site adjacent to the A421.
- 9.3.5. Also, there only a small number of references to noise pollution / the need for a noise assessment (most of the references relate to committed sites). Requirements might be specified for select sites in proximity to a strategic road or a railway line, but equally this can be a matter appropriately covered by DM policy.

DM policies

- 9.3.6. Policy NE21 (Pollution, air quality and contaminated land) deals with air and noise pollution, but requirements are fairly nationally standard.

Conclusion

- 9.3.7. In conclusion, a **'moderate or uncertain' negative effect** is predicted, given the challenges and uncertainties in respect of transport infrastructure / traffic.

9.4. Biodiversity

Conserve and enhance designated sites, in accordance with their significance and in line with established good practice. Take a strategic, landscape-scale approach to biodiversity, focused on ecological connectivity / networks and climate change resilience. Ensure accordance with the mitigation hierarchy (avoid, mitigate, compensate).

Strategy / sites / supply

- 9.4.1. The appraisal in Section 6 finds there to be limited concerns regarding biodiversity impacts under growth scenario 1, although there is limited evidence of growth being directed with a view to aligning with the objectives of the Buckinghamshire LNRS (2026).
- 9.4.2. Also, at this stage it is appropriate to summarise matters relating to Habitats Regulations Assessment (HRA). Specifically, supporting text in the plan explains:

"The [HRA] has concluded that avoidance and mitigation should be considered where increased recreational use is predicted to cause adverse impacts on a site (all Habitats sites apart from Aston Rowant SAC). Avoidance of recreational impacts at Habitat sites involves locating new residential development further away (where possible). Strategic plans, such as Local Plans provide the mechanism for this. Where avoidance of impacts is not possible, mitigation will usually involve a mix of access management, habitat management and provision of alternative recreational space. The HRA concluded that the plan would not result in adverse effects given the plan policy framework and subject to the mitigation strategies being implemented.

The Plan allocates Suitable Alternative Natural Greenspaces (SANG) both as part of key strategic sites and as standalone strategic SANGs, as well as a Gateway site. The Plan also sets out SANG and Gateways principles for these – and others – to come forward within the lifetime of the Plan. In doing so, the Plan provides a strong strategic framework, to sufficiently mitigate any potential adverse effects on the designated sites... Project levels HRAs will still be required as part of the planning process.

We will continue to monitor the SACs over the lifespan of the Plan and update the Chilterns Beechwoods SAC Mitigation Strategy and Burnham Beeches SAC Mitigation Strategy to reflect updated evidence...

... Additionally, Policy NE1 Water quality requires development to not adversely affect the water quality of surface or underground water bodies. This... ensures that there will not be an adverse effect... on Burnham Beeches SAC with regards to this impact pathway... The Burnham Beeches Hydrology Study has defined a catchment area within which reductions in permeability may impact the water quantity and level within the SAC. There are no sites allocated for development within this hydrological catchment. Given this it is concluded that the [plan] will have no adverse effects on integrity of the Habitats site following appropriate analysis via this impact pathway."

Strategic policies

- 9.4.3. Policy SP13 (Natural environment and climate resilience) is broadly supportive of biodiversity objectives, but it is difficult to identify distinct policy choices / decisions that have been taken in response to local issues and opportunities.

Site-specific policies

- 9.4.4. Beginning with SANG provision, the situation is improving, but there remains a need for ongoing work to confirm sites required to deliver SANG. At certain sites the requirement is to deliver SANG onsite “where feasible” and, in turn, there is a need to ensure that a potential need for SANG provision has fed into site capacities.
- 9.4.5. At all of the sites where site specific policy states that permission “will not be granted until SANG and SAMM mitigation is in place” the supporting text explains that it will likely be possible to secure credits at an offsite strategic SANG, which generates confidence. Also, Policy CHE01 (Land at Horton, Cheddington) is of note, in that the supporting text states: “It is anticipated that suitable SANG could be delivered on-site.”
- 9.4.6. There are also a number of instances of policies responding to clear site-specific biodiversity issues or opportunities, for example: at the Haddenham NESS site there is a requirement to integrate Snakemoor Nature Reserve as part of a green infrastructure network; and supporting text for the Princes Risborough NESS site states: “De-culverting the stream should be incorporated into these measures and presents an opportunity to enhance the stream corridor and improve biodiversity, preferably without the need for the new road to cross the stream requiring a culvert. However, some limited culverting may be required to achieve an appropriate road alignment.”
- 9.4.7. Maintaining a focus on the chalk stream constraint affecting Princes Risborough, the other key allocation is Land to the rear of Poppy Road, where the current proposal for 150 homes is a significant increase on the current allocation for 50 homes (as set out in the Wycombe Local Plan). The requirement is for: “Provision of a 50m ecological buffer between development and the chalk headwaters of the Pyrtle Spring.”
- 9.4.8. However, overall is the potential to further supplement site-specific policy. For example, in respect of the proposal to significantly extend the committed Shenley Park strategic allocation (as set out in the Vale of Aylesbury Local Plan), the effect of growth would be to envelop two woodlands and a stream corridor, and take the western edge of Milton Keynes as far as the Whaddon Chase woodlands, but this is not referenced in site-specific policy, and supporting text states only: “The site falls to a shallow valley running east-west through the centre of the site there are two substantial areas of woodland on the site which should be retained.” In this regard it is noted that supporting text elsewhere in the plan document references Whaddon Chase as a key asset:

“The character of Buckinghamshire is defined by a wide variety of green infrastructure assets, including rural and urban trees, formal country parks and meadows, forests (including former royal hunting forests such as Whaddon Chase and Bernwood Forest)... These features should be recognised, enhanced and, where possible, better connected—for example, by improving pedestrian and cycle links...”

DM policies

- 9.4.9. Whilst some of the policy requirements are nationally standard, there are also some notable policy requirements responding to the Buckinghamshire-specific context.
- 9.4.10. Beginning with Policy NE4 (Biodiversity – protection and enhancement of sites and habitats of high biodiversity and geodiversity importance), this notably requires the following in respect of locally designated sites (Local Wildlife Sites):
- “...Ecological impacts are avoided or minimised, and those impacts which cannot be, will be mitigated and compensated for through a 2:1 area ratio and ‘like for better’. Compensation and enhancement should be on site, or as a last resort within the local ecological network...funded long term... and align with... the [LNRS].”

- 9.4.11. Also, the policy sets out that: “Sites of high biodiversity or geodiversity importance will be protected and enhanced via the use of appropriate buffers... Appropriate buffers will be case specific but will be a minimum of: a. Fifty metres for Sites of Special Scientific Interest (SSSIs); b. Fifty metres from ancient woodland unless local circumstances justify otherwise; c. Thirty metres for sites of local importance.” The proposed buffer for ancient woodland is considered to be good practice (it is common to see a requirement for a 15m buffer), but there is a case for expecting a buffer of more than 50m to SSSIs.
- 9.4.12. Secondly, Policy NE7 (Green Infrastructure) also sets out some notable requirements, including setting out that developments of more than 10 homes must: “Respond to local context by demonstrating an understanding of existing GI assets and... enhance and extend these networks... informed by...” There are also a range of other requirements, including to submit: “A Green Infrastructure Statement... setting out how the proposal... enhances the local GI network, and satisfies [accessible greenspace] requirements.”
- 9.4.13. Thirdly, Policy NE9 (Trees, ancient and veteran trees, woodlands, orchards) also sets out some very notable requirements, including required buffers to non-ancient woodland (25m), hedgerows (5m) and veteran trees (detailed requirements are set). There is also detailed guidance provided in respect of what qualifies as a Traditional Orchard of Local Significance, including confirming that this can include abandoned orchards.
- 9.4.14. Fourthly, Policy NE10 (Ecological enhancements) also sets out notable requirements, for example sites of ten or more homes must deliver “ecological features (over and above any required for direct species compensation)”. Specifically, features must be delivered at a rate of: “At least two features per dwelling (half of which should be swift boxes), considering the local context to maximise uptake from target species.”
- 9.4.15. Fifth, Policy NE12 (Special Areas of Conservation, Special Protection Areas and Ramsar sites) is mostly nationally standard, but does confirm that SANGs are required to be delivered at the following sites (some of which are committed): Aylesbury North of A41; Aylesbury North NESS; Aylesbury Land south A41; Cheddington NESS; Land at Horton, Cheddington; RAF Halton; Stoke Mandeville NESS; Wing NESS. Furthermore, it confirms the following existing or committed strategic SANGs (as shown on the Policy Map): Kingsbrook Meadows, Aylesbury; Land at Bell Lane, Chesham; Spade Oak Lake, Little Marlow (which has a specific policy, namely NE15 Little Marlow Lakes).
- 9.4.16. Finally, in respect of Biodiversity Net Gain (BNG), the proposal is to require the national minimum 10% (the potential to require more through local plans is questionable). Supporting text to Policy NE6 (Biodiversity gain and nature recovery) explains:
- “As they set opportunities for habitats creation and enhancement at landscape-scale, Local Nature Recovery Strategies can inform the strategic delivery of offsite biodiversity gain in the right places, where offsite provision is needed to meet the biodiversity gain condition for a development and it cannot be met in full through onsite habitat enhancements. The Council will... work with landowners to develop a pipeline of Biodiversity Gain Sites which deliver the best outcomes for nature’s recovery... and ensure that a local supply of biodiversity gain units is available for developers.”

Conclusion

- 9.4.17. In conclusion, a **neutral effect** is predicted. The proposed strategy / supply gives rise to limited concerns and a robust DM policy framework is proposed, although area-wide DM policy requirements warrant further scrutiny in terms of implications for site viability and there is scope to bolster site-specific policy requirements.

9.5. Climate change adaptation

Plan strategically for flood risk, mindful of climate change scenarios, and also ensure resilience to wider climate change impacts, including overheating risk. Linked to biodiversity objectives, support restoration of natural processes and the avoid actions that further constrain the natural environment’s ability to respond to climate change.

Strategy / sites / supply

- 9.5.1. The appraisal in Section 6 flags a potential concern with growth scenario 1 as there are a number of sites that significantly intersect a flood zone. A particular issue is urban sites intersecting a flood zone that are proposed for high density development, although there is typically good potential to mitigate risk through design (e.g. non-residential ground flood uses) and wider measures, including safe access and egress in the event of a flood. In particular, there are clusters of challenging sites in High Wycombe and Chesham, which reflects the town centres being closely associated with rivers (the Wye and the Chess respectively) and a characteristic Chilterns topography / geology.

Strategic policies

- 9.5.2. Policy SP13 (Natural environment and climate resilience) is broadly supportive of flood risk objectives, but it is difficult to identify distinct policy choices / decisions that have been taken in response to local issues and opportunities.
- 9.5.3. There could be merit to supplementing this policy such that there is a specific focus on the matter of flood risk in urban areas (given proposed growth / regeneration), and potentially flood risk affecting specific key settlements.

Site-specific policies

- 9.5.4. Flood risk is discussed for numerous sites, for example:
- CHS02 (Albany Place Car Park, Chesham) – "Redevelopment of the site could present significant risk in terms of flooding... The SFRA Level 2 indicates that 91% of the site is in Flood Zone 3b and flooding is unlikely to be mitigated on site. Therefore, off site flood storage would be required to manage fluvial flood risk at the site. The applicant will need to show, through an FRA, that the development will be safe for its lifetime taking account of the vulnerability of its users. It is for the applicant to show that the development meets the objectives of the NPPF's policy on flood risk."
 - CHS03 (Water Meadow Car Park, Chesham) – "Redevelopment of the site could present significant risk in terms of flooding. Developers will need to follow the SFRA Level 2 recommendations in terms of site-specific guidance for site design and making development safe."
 - CHS01 (Star Yard, St Mary's Way, Old Town, Chesham) – "The site is complex having a culvert of the river Chess running underneath it and with many premises fronting the high street, having a right of access across the car park. The site also falls within Flood Zone 2, and any development would need to demonstrate mitigation against flooding in line with the policies within this plan and the Strategic Flood Risk Assessment. The site also provides access to the Catlings car park and... Town council offices."
 - HIW05 (Council Offices, Queen Victoria Road, High Wycombe) – "Parts of the site are potentially at high risk of surface water flooding and fluvial flooding from the river Wye. There are also known risks of flooding of subsurface assets due to groundwater flood risk, and reservoir flood risk. Any redevelopment of the site will need to demonstrate safe access, and egress is achievable throughout the lifetime of the development, as per the latest SFRA. Developers will need to provide a site-specific combined (1D-2D) hydraulic model to demonstrate this. Any modelling needs to be completed to the satisfaction of the EA and LLFA before applying... it is envisaged that the site could provide some office and healthcare facilities, as well as NHS key workers housing, subject to further flood risk assessment."
 - HIW06 (Office Outlet site, High Wycombe) – "Redevelopment of the site could present significant risk in terms of flooding. Developers will need to follow the SFRA Level 2 recommendations in terms of site-specific guidance for site design and making development safe."

- HIW04 (Easton Street multi-storey car park, High Wycombe) – the SFRA level 2 indicates that 90% of the site is at low-risk existing surface water flooding, 18% medium risk, 14% high risk. This is based on the multi storey car park on the site which closed in May 2026. With climate change, there is predicted to be a large increase in the percentage of the site which is at surface water flood risk... As the development is intended to be mixed use, commercial development or car parking of lower vulnerability should be prioritised as ground floor development...
- AYL09 (Exchange Street Carpark, Aylesbury) – “There are also flooding constraints with surface water flooding in the middle of the site and heritage constraints including the nearby Aylesbury Conservation Area and several Listed Buildings... There are several large established trees on the site within green space... These constraints do not prevent the development from coming forward and the redevelopment of this site would be required to address and mitigate against these constraints.”

- 9.5.5. Overall, there is a need for ongoing scrutiny of how flood risk avoidance and mitigation has factored in when considering the capacity of a number of urban redevelopment sites (accounting for use mix assumptions) and their delivery trajectories. It is acknowledged that urban redevelopment can lead to an opportunity to deliver sustainable drainage systems (SuDS) that can potentially deliver a flood risk benefit to the local area. Also, it is acknowledged that many of the sites in question are key regeneration sites and are proposed for a mix of uses. However, given climate change scenarios there is a need to question intensified use of sites subject to flood risk have historically been used for low intensity or low vulnerability uses, such as car parks.

DM policies

- 9.5.6. Policy CC1 (Flood risk) is fairly nationally standard. A site-specific Flood Risk Assessment is required for: a) All development in areas at risk of flooding (now or in the future); and b) All sites greater than 1ha. Sites including 50 dwellings or more, or 1 ha or more for non-residential sites, will be required produce “a strategic drainage strategy which will inform the masterplanning and comprehensive delivery of SuDS across the site, maximising drainage and other co-benefits (such as biodiversity landscape and amenity). This must consider climate change allowances and residual risk.”
- 9.5.7. CC2 (Sustainable Drainage Systems (SuDS)) also appears to be fairly nationally standard. The supporting text notably explains: “Brownfield sites typically have higher existing runoff rates compared to greenfield sites due to their existing impermeable area; therefore, the proposed discharge rate may be higher (the proposed discharge rate must not exceed the brownfield rate). However, through the use of well-designed SuDS strategies, it is possible to reduce discharge rates close to the greenfield rate. This approach must be adopted wherever feasible.”

Conclusion

- 9.5.8. In conclusion, a **‘moderate or uncertain’ negative effect** is predicted. The site-specific discussions set out above suggest a risk or delivery challenge across a number of sites.

9.6. Climate change mitigation

Contribute to reductions in per capita emissions from both transport and the built environment, in line with the Government’s targets for net zero. Seek to realise opportunities for supporting larger scale renewable energy schemes and also strategic carbon sequestration (e.g. new woodlands).

Strategy / sites / supply

- 9.6.1. The appraisal in Section 6 flags a potential concern with growth scenario 1, essentially because there is limited evidence of growth being distributed / sites being selected for allocation with a view to delivering on established decarbonisation commitments.

Strategic policies

- 9.6.2. Policy SP11 (Energy efficiency and natural resources) is a key policy. The proposal is not to require built environment energy / carbon standards over-and-above the minimum requirements set out in Building Regulations (unlike numerous other adopted and emerging local plans, e.g. Milton Keynes and Wokingham, as discussed in the Interim SA Report, 2025), although this is a matter that has been a focus of debate nationally, including due to viability implications). However, there is a requirement for larger development sites to submit information demonstrating that consideration has been given to innovative energy infrastructure (the reference to combined heat and power might be revisited, on the basis that any use of gas may not represent a low carbon option given decarbonisation of the national grid). Also, there is a proactive approach proposed in respect of strategic planning for large-scale renewable energy, which primarily means solar farms and battery storage, but also potentially wind farms.

Site-specific policies

- 9.6.3. Decarbonisation / net zero development etc is not a focus of site-specific policies, other than Policy NESS010 (Princes Risborough NESS), where the requirement is: “Promote sustainable development, including efficient use of resources, renewable energy and biodiversity enhancement.” There is a need for ongoing consideration of site-specific built environment decarbonisation opportunities, e.g. energy infrastructure related.

DM policies

- 9.6.4. There are no DM policies proposed in respect of built environment decarbonisation, which is in contrast to many local plans nationally. However, it is acknowledged that the Draft NPPF (2025) proposes to restrict the ability of local plans to set local standards.

Conclusion

- 9.6.5. In conclusion, a **‘moderate or uncertain’ negative effect** is predicted. Built environment decarbonisation is not a major focus of the plan, although there is a proactive approach to planning for large-scale energy infrastructure. There is also a need to consider the key issue of transport decarbonisation (see discussion below).

9.7. Communities and health

In addition to ensuring good accessibility to community infrastructure, seek to realise wide-ranging other communities and health objectives (for example in terms of access to green infrastructure, supporting vibrant town centres, and addressing relative deprivation and inequalities).

Strategy / sites / supply

- 9.7.1. The appraisal in Section 6 flags a potential concern with growth scenario 1, particularly relating to growth at existing settlements recognising that this is the first consultation on a full draft plan. However, the baseline scenario is one involving piecemeal growth at pace under the presumption in favour of sustainable development.

Strategic policies

- 9.7.2. A number of the strategic policies are broadly supportive of communities and health objectives, but it is difficult to identify distinct policy choices / decisions that have been taken in response to local issues and opportunities.
- 9.7.3. The policies relating to Town Centre Regeneration are broadly supported, but there is a need to confirm that the proposed high densities for town centre sites does not create challenges (as discussed). Policy SP16 (Healthy communities and tackling health inequalities) is then a high level policy that broadly sets out key objectives, and sets a framework for key DM policies, including those discussed below.

Site-specific policies

- 9.7.4. There are many references to green infrastructure across site-specific policies; for example at several of the committed sites and at one new proposed allocation (AYL06: Land to the north of Martin Dalby Way, Aylesbury) there is a requirement for 50% onsite green infrastructure. Also, for the proposed NESS sites the concept maps that have been prepared provide confidence regarding a high quality green infrastructure network, and the site-specific policies include specific requirements sports facilities.
- 9.7.5. However, for a number of other strategic-scale sites the requirements are somewhat generic, e.g. WIN02 (Land west of Furze Lane and north of Verney Road, Winslow), where the requirement is for: "...a landscape-led and green infrastructure approach."
- 9.7.6. With regards to place-making, the following supporting text from Policy NESS012 (Winslow NESS) provides a case-study:
- "A key objective is to ensure that development is well integrated with Winslow, supporting the town centre and avoiding the creation of a separate settlement... The allocation provides an opportunity to deliver a major urban extension with housing, employment land and supporting infrastructure to create a sustainable community... The development includes provision of approximately sixteen hectares of employment land, supporting local economic growth and job creation... Community infrastructure, including local centres, education, healthcare and recreation facilities, will be delivered in accordance with the scale of development... Healthcare provision will be informed by engagement with the Integrated Care Board and updated evidence at the planning application stage."
- 9.7.7. Cheddington is also a key settlement to consider, with the supporting text to Policy CHE02 (Land at Station Road, Cheddington) setting out: "Given the cumulative impacts of planned growth at Cheddington, coordinated delivery of strategic infrastructure will be required. This includes ... [see discussion below]."
- 9.7.8. With regards to town centre regeneration sites, a case study is Policy AYL09 (Exchange Street Carpark, Aylesbury). Supporting text explains:
- "The site has a very high level of accessibility without needing a car. There are significant opportunities for a development on this site to help economic growth in the town centre with a range of town centre uses and employment generating uses. Like the established Exchange development adjacent, the site presents an opportunity for town centre living in high quality accommodation helping to meet local housing needs... Waterside North and South are already transforming into a cultural hub. This site allocation is one of the later phases of the scheme which aim to add quality public spaces and civic and community uses into the town centre and enhance town centre linkages with the Grand Union Canal and Bear Brook."
- 9.7.9. Also, in addition to town centre regenerations sites, another key site is PRI01 (Land at Princes Risborough Station). Supporting text explains:
- "The redevelopment of the land at Princes Risborough Station will provide an important gateway to the town and to the Chilterns National Landscape. Development proposals are required to be of a high standard of design and a range of mixed uses appropriate for the site location... The station will become the focus of a wider mixed-use area with redevelopment of sites east of the station for residential, employment and commercial activities, with potential for a hotel... The creation of a public station square will be the focus of connections with the rest of the town: Station Road / Bell Street provide the traffic route; Stratton Road / Manor Park Avenue provide a route for pedestrians and cyclists. It should be of the highest quality and green in character, to set the scene when arriving, and support the integration of the Chinnor steam railway with Princes Risborough station, to improve the visitor experience and promote tourism. The addition of a hotel would fulfil a long-held aspiration of the local community... The station square will gather up the approaches to the station and provide facilities for cars and car parking and for public transport to the station, and for walking and cycling routes to and through the station. There is the potential for a footbridge to the Princes Estate..."

... Station Square will provide: a) Improved and enlarged forecourt with integrated bus facilities for interchange and onward travel; b) Integrated car parking and cycle hire c) A small-scale convenience retail space - retail provision is ancillary to the station function and not intended to compete with Princes Risborough town centre; d) A combined café / information centre; e) Interpretive information and signage for the railway system in general and the steam railway in particular... East of the railway line, redevelopment of sites needs to reflect the increased importance of the station and its connections to the town centre with dense development surrounding high quality public spaces.”

DM policies

9.7.10. Policies of particular note include:

- NE11 (Colne Valley Regional Park) – “The forthcoming Buckinghamshire Green Infrastructure Study will help enhance connectivity and recreational space from the rest of Buckinghamshire into the Park.” This is a key opportunity of regional significance, a the park is undoubtedly a primary ‘green and blue lung’ for London (it covers 110 km²) and if strategic growth is to be considered in the south east of Buckinghamshire in the future this must be alongside strategic planning for green and blue infrastructure.
- BE1 (Space standards) – “All new dwellings and conversions will be required to meet up-to-date nationally described... minimum internal space requirements.”
- SE1 (Health impact assessment) – Certain developments including residential development of net 100 dwellings or more must submit a Health Impact Assessment (HIA) “at the earliest possible stage prior to the submission of a planning application”. Applicants should use the Buckinghamshire HIA toolkit and guidance once published.
- SE3 (Community food growing) – requirements are set out for schemes of more than 50 homes and then additional requirements are set out for schemes over 100 homes.
- SE5 (Sport, leisure and recreation) – “New housing development of more than 10 units... will be required to meet the Standards in Appendix P...”

Conclusion

9.7.11. In conclusion, a **‘moderate or uncertain’ negative effect** is predicted. There are many positive aspects of the plan but there are risks and uncertainties ahead of consultation.

9.8. Economy and employment

Meet the full range of employment land needs and more widely reflect the objectives set out in the NPPF, including the headline objective of supporting economic growth and productivity. Build on local strengths, counter any weaknesses and address the challenges of the future, including guided by strategy/policy defined at key functional scales.

Strategy / sites / supply

9.8.1. The appraisal in Section 6 is quite strongly supportive of growth scenario 1, as employment land needs would be provided for in full, and there is a good mix of sites in some respects, notably: there is a clear case for new employment land at Winslow given EWR and more broadly a location within the Oxford to Cambridge Corridor; Long Crendon is linked to the M40, Thame (where there is significant employment land) and Haddenham (a proposed strategic growth location); at Princes Risborough there is limited current employment land such that there is support for new employment land to compliment housing growth; and Finemere Aerodrome is located on the A421, which is a strategic road linking the M1 and M40. However, there is a degree of concern regarding over-reliance on one major site, namely Westcott (between Aylesbury and Bicester), where transport connectivity is challenging.

Strategic policies

9.8.2. SP4 (Strategy for economic growth) is a key policy, and read alongside its supporting text the proposed strategy is supported. It leads to confidence in a well-targeted approach to planning for existing and new employment sites, including responding to locational and sector-specific needs and opportunities.

9.8.3. Supporting text explains:

- “The Buckinghamshire Local Plan... has an important role in supporting sustainable economic growth by: a) planning positively for future employment needs; b) ensuring sufficient employment land is available in the right locations; c) supporting productivity growth in high value sectors; d) protecting and enhancing existing employment areas; e) improving access to jobs, skills and infrastructure; f) supporting regeneration and town centre renewal; and g) aligning homes, jobs and infrastructure growth.”
- “Employment growth will primarily be focused in: a) Aylesbury; b) High Wycombe; c) Winslow; d) Westcott; e) Silverstone-related growth locations; f) Strategic business parks and enterprise zones; and g) Selected sustainable urban extensions and employment expansions. This approach supports the [NPPF] requirement... to set out a clear economic vision and strategy and aligns with Buckinghamshire’s Economic Growth Plan and the Government’s National Industrial Strategy priorities.”

There could be merit to additionally referencing Marlow Film studios, as well as the possibility of future data centres in the south of Buckinghamshire.

- “The strategy focuses growth where it can support existing economic clusters, improve access to labour markets and infrastructure, align homes and jobs growth, reinforce strategic transport connections and support regeneration priorities.”
- “This approach reflects Buckinghamshire’s role within England’s Economic Heartland and the Oxford-Cambridge Growth Corridor, where improved east-west connectivity and innovation-led growth are expected to drive significant economic change. The Local Plan also recognises the potential for future collaborative Spatial Development Strategy (SDS) arrangements across Buckinghamshire, West Northamptonshire and North Northamptonshire to help deliver shared economic growth ambitions. These areas share common objectives focused on increasing productivity, supporting high-value sectors and strengthening strategic connectivity across the corridor.”
- “This is particularly relevant to the Silverstone cluster and wider growth corridor linking Northamptonshire, Milton Keynes, Winslow, Aylesbury and High Wycombe, where advanced manufacturing, digital, defence, clean energy and life sciences sectors are driving significant innovation and productivity growth. Improved connectivity, including East West Rail and strategic transport corridors, has the potential to unlock further growth and strengthen economic relationships between these locations.”
- “The Local Plan supports improved connectivity between Buckinghamshire’s economic centres through: a) East West Rail; b) the A421 growth corridor; c) strategic road links including the M40 and M1; d) active travel infrastructure; e) digital connectivity; and f) improved public transport access to employment locations.”

There could be merit to referencing the strategic importance of an EWR spur down to Aylesbury via Calvert, which is currently not funded but which could deliver major benefits and is understood to be associated with relatively limited delivery challenges.

- “Existing business parks, industrial estates and strategic employment locations continue to make an important contribution... However, some sites face pressures associated with ageing premises, limited expansion capacity, poor public transport access and pressure for alternative uses. The Local Plan therefore seeks to: a) safeguard viable employment land; b) support regeneration and modernisation of employment sites; c) improve infrastructure and environmental quality; d) encourage intensification where appropriate; and e) support energy and digital upgrades.”

- “Strategic employment locations including Westcott Venture Park, Silverstone Park, Pinewood and Woodlands Enterprise Zone will continue to be supported as nationally significant growth locations.”
- “Given the scale of employment land proposed at Winslow, together with the planned population growth, the site presents a significant opportunity to support sustainable economic growth in northern Buckinghamshire. Its location adjacent to the new East West Rail station, proximity to the Silverstone Innovation and Enterprise Cluster, and position within the Oxford–Cambridge growth corridor, provide the potential to attract investment, support business growth and create highly accessible... opportunities... Winslow is particularly well placed to support growth in a range of knowledge-intensive and high-value sectors that build upon Buckinghamshire's existing economic strengths and strategic clusters, including: a) Advanced Manufacturing and High-Performance Engineering; b) Film and Television and the Creative Industries; c) Space, Defence, Robotics and Autonomous Systems; and d) Life Sciences and Health Technologies.”
- “The Local Plan also recognises increasing demand for data centres and digital infrastructure. A criteria-based approach will ensure proposals are located appropriately, supported by sufficient energy and digital infrastructure capacity and do not adversely affect local communities or infrastructure.”

9.8.4. Further key points include:

- Windfall – “Development proposals on non-allocated sites which provide strong evidence as to how they will help to further the five strategic priorities of Buckinghamshire's Economic Growth Plan will be supported, providing they are in a sustainable and accessible location and do not undermine the delivery of allocated employment sites.”
- Key sectors – “Development proposals that would provide additional floorspace associated with research and development uses will be strongly supported.”
- Warehousing and distribution – Policy SP4 states: “Employment development, particularly larger-scale industrial, warehousing and distribution development, should be located and designed to ensure safe and suitable access to the strategic and local transport network, provide appropriate opportunities for access by walking, cycling and public transport, and avoid or mitigate adverse impacts arising from HGV movements, traffic generation, air quality, noise and other environmental effects.”

Buckinghamshire is perhaps not as well placed as some authorities to make provision for strategic / sub-regional needs, including given constraints affecting land in proximity to junctions on the strategic road network. However the proposed strategy warrants ongoing scrutiny, including noting that Milton Keynes (where there has been extensive development for warehousing and distribution) is set to generate an unmet need.

Site-specific policies

9.8.5. A key consideration is Policy WES01 (Westcott Enterprise Zone and Venture Park), with the site-specific policy explaining:

“The continued success of the site needs to build on its strong history of partnership working, for example with the Satellite Applications Catapult, UK Space Agency, government departments, businesses and education providers. The shared ambition is to grow the Westcott Space Cluster within the site and drive inward investment and development of existing and new facilities to support the UK space and related industry sectors. The policy takes a flexible approach to uses within the site to support innovation, respond to changing market conditions, and maintain the site's competitiveness. This flexibility reflects the site's specialist role and its location outside of established urban areas, which can present challenges in attracting and retaining businesses and skilled workers. Any residential development must remain clearly subordinate to the primary employment function of the site and must not constrain existing or future business operations. Such uses should be carefully located and designed to avoid conflicts with operational activities, including those associated with testing and other potentially sensitive uses. This approach reflects the site's unique

characteristics and ensures that its role as a strategic employment location is not compromised. A range of ancillary uses has already been established on the site, including conference and hospitality facilities such as the Skylark centre. Additional supporting facilities may be required over time to maintain the attractiveness and functionality of the site, and the policy supports the provision of such uses where they are proportionate and directly related to the employment function of Westcott Venture Park. Limited on-site residential accommodation is supported where it is necessary to meet the operational needs of the site. This includes short-term and temporary accommodation associated with specialist facilities, such as testing and research infrastructure, which are often used on a temporary or short-duration basis. Providing on-site accommodation enables businesses to make effective use of these facilities and supports the continued growth of the site.”

9.8.6. Also of note is Policy IVE01 (Pinewood Studios, Iwer Heath):

“Pinewood Studios benefits from a number of extant planning permissions that provide for substantial additional film production, media and supporting infrastructure floorspace. These include the Screen Hub UK permission granted in 2022, the Pinewood South Screen Hub permission granted in 2023, and an outline permission for a data centre development granted in 2026. The Local Plan policy has been prepared having regard to these permissions and is intended to provide a consistent strategic planning framework that supports their delivery whilst safeguarding the site's primary role as a nationally significant centre for film, television and creative industries activity...”

DM policies

9.8.7. Key policies include:

- EC4 (Skills and local employment) – New major developments of 100 or more dwellings or 1,000 sqm or more floorspace... will be required to deliver measurable local employment, skills and training outcomes proportionate to the scale and nature of the development... supported by a Local Employment and Skills Plan (LESP)...”

The supporting text also explains: “Major development can generate significant employment opportunities... Securing these benefits locally helps support economic resilience, improve productivity and enhance life chances for residents. Evidence indicates a clear need for this intervention. In 2021, 26,930... residents aged 18–64 had no qualifications... and in 2023 approximately 9,600 residents were not in work but wished to be... Improving access to training and employment opportunities is therefore critical to supporting the local economy and reducing inequalities.”

- EC5 (Data centres) – the supporting text explains:
 - Proposals are expected to demonstrate a realistic pathway to securing power connections, recognising that developers may not have direct control over all aspects of network reinforcement.
 - Proposals should demonstrate that water supply and use are sustainable and do not place undue pressure on existing infrastructure. The Plan's wider policies on climate change, water efficiency and flood risk will also apply.
 - Proposals should seek to minimise reliance on diesel generation... An Air Quality Impact Assessment will be required where operational plant, equipment or back-up power systems have the potential to affect local air quality.
 - Careful design, layout and mitigation are required to ensure that impacts on residential amenity and other sensitive uses are avoided or minimised.
 - High-quality design and landscaping are essential, particularly where development is proposed in sensitive locations such as the Green Belt or valued landscapes. In such locations, proposals must be justified in line with national policy, including demonstrating that there are no suitable alternative sites in less sensitive areas.
 - The policy makes explicit reference to the need for contributions to local skills and employment, ensuring that such developments support inclusive economic growth.

- TR5 (Freight and logistics) –
 - Proposals which facilitate modal shift to rail freight will be supported.
 - Facilities that enable sustainable freight activity and first mile / last mile solutions, in accordance with the adopted Local Transport Plan, will be supported.
 - Smart warehousing through retrofitting of existing stock will be supported.
 - New proposals (temporary or permanent) for freight and logistics movements should not have a significant detrimental impact on the local area.

The supporting text explains:

“As the most established modern economy presence within Buckinghamshire (freight and logistics dominate the employment figures at both the Buckinghamshire and national level, representing 72.1% of modern economy roles in Buckinghamshire in 2023), there are many businesses within the wider freight and logistics supply chain. Most prominently, these businesses are wholesalers, including pharmaceuticals, food and agricultural products, and office machinery and equipment. These businesses are positioned along key road connections, with clusters in and around the main settlements and business parks.

The Council is involved in developing a regional freight strategy as part of its involvement in England’s Economic Heartland. Buckinghamshire’s relative lack of strategic freight infrastructure such as ports, airports, and rail freight terminals limits its potential comparative advantage in the sector. Conversely, logistics, which includes warehousing and storage, demonstrates considerably stronger demand conditions, indicative of excess demand for logistics services.”

Conclusion

- 9.8.8. In conclusion, a **‘moderate or uncertain’ positive effect** is predicted. There are many positive aspects to the plan but again there is a need for scrutiny through consultation.

9.9. Historic environment

Conserve and enhance the historic environment, with a focus on designated assets, but also non-designated assets and historic character. Consider links to landscape, place-making and other objectives.

Strategy / sites / supply

- 9.9.1. The appraisal in Section 6 flags a potential concern with growth scenario 1, recognising that constraints are widespread and Historic England has not yet provided comments. Several NESS sites are challenging, and there is a need to consider in-combination impacts of sites at sensitive settlements such as Haddenham.

Strategic policies

- 9.9.2. Policy SP15 (Conservation and enhancement of heritage assets) is a key policy, but it is difficult to identify distinct policy choices / decisions that have been taken in response to local issues and opportunities, in the context of likely forthcoming NDMPs.
- 9.9.3. Notably, the policy states: “*Applicants will be required to describe the significance of any heritage assets affected, including any contribution made by their setting, in a manner proportionate to the asset’s significance and the potential impacts of the proposal through a Heritage Statement. The results should be submitted to the Buckinghamshire Historic Environment Record.*” However, the HER is not an accessible or engaging (at the time of writing the weblink is broken), and so there could be further opportunities to enhance understanding and appreciation of the historic environment via information submitted as part of planning applications. The [Local Heritage List](#) is a key resource, as is the Buckinghamshire [Historic Towns](#) Project. Also, further work might be undertaken to increase understanding of the designated archaeological notification areas.

Site-specific policies

9.9.4. Numerous site specific policies reference historic environment constraints, and the following quotes are taken from supporting text:

- NESS004 (Cheddington NESS) – “The setting of Mentmore Towers... is a key consideration, alongside the Grand Union Canal corridor and associated... assets.”
- NESS011 (Stoke Mandeville NESS) – “Heritage assets, including Stoke House, will be conserved and enhanced through careful design and layout.”
- NESS018 (Wing NESS) – “The presence of heritage assets, including Wing Conservation Area and Castle Hill Scheduled Monument, adds sensitivity and requires careful consideration in the design of the development.”
- AYL06 (Land to the north of Martin Dalby Way, Aylesbury) – “The Quarrendon Scheduled Monument is located immediately south of Martin Dalby Way. Development proposals will need to conserve the significance of this nationally important heritage asset, including its setting, and ensure that appropriate measures are implemented to maintain its long-term management and continued grazing regime.”
- HIW04 (Easton Street multi-storey car park, High Wycombe) – “The area is a mix of historic buildings including listed and locally listed buildings and large office buildings dating from the 1960’s. It is also partly within the High Wycombe Conservation Area... The area would benefit from comprehensive regeneration and redevelopment. Comprehensive proposals will be expected to make the most of its key location to secure much needed town centre homes, as well as complementary...”
- CHS01 (Star Yard, St Mary’s Way, Old Town, Chesham) – “The site is located to the rear of the high street conservation area although there are proposals to extend the conservation area to include Lowndes Park the other side of St Mary’s way. Development proposals must conserve... the Chesham Conservation Area and its setting, informed by an appropriate heritage assessment.”
- CHS03 (Water Meadow Car Park, Chesham) – “The site is located within the Chesham conservation area. There are proposals to extend the conservation area to include Lowndes Park and to add houses in Wey Lane which back onto the site. Any re-development of the car park would need to demonstrate a way to mitigate the impact of the setting of the conservation area and the conservation area itself.”
- HAD01 (Aston Road, Haddenham) – “The site contains two Archaeological Notification Areas (ANAs) linked to cropmarks, with a further ANA immediately north covering Haddenham’s historic core. There is high potential for prehistoric and medieval remains, including links to Aston Sandford. The site is not within a Local Historic Landscape but is bordered by locally listed features, including the medieval remains of Aston Sandford (east) and Tythrop House (south-west). While no listed buildings or TPOs lie within the site, a Conservation Area with numerous Grade I and II listed buildings adjoin the north-west boundary. Geophysical survey and trial trenching should be undertaken... The site contributes to the rural setting of the nearby Conservation Area and supports important views to and from heritage assets. Views into the site are partially screened by tree belts and hedgerows, especially along the northern boundary and Aston Road. More open views exist from Stanbridge Road, the Public Right of Way in the north-east, and elevated viewpoints to the south-east, including the Chilterns. Development should focus on the less sensitive northern area. A heritage impact assessment should be undertaken to inform...”
- WIN01 (Land off Little Horwood Road, Winslow) – “Half of the site [for 1,500 homes] is identified as an important archaeological earthwork; therefore, an archaeological investigation is essential prior to the submission of a planning application.”
- CHE01 (Land at Horton, Cheddington) – “The site is in proximity with several designated heritage assets within Horton, including... Development has the potential to affect the wider setting of these heritage assets and could give rise to less than substantial harm (as defined by national policy). Proposals will be required to be supported by proportionate assessment, including a Heritage Statement...”

- CHE03 (Land north of Reynolds Mead, Cheddington) – “The site lies in proximity to the Mentmore Conservation Area and the Mentmore Registered Park and Garden, including the designed avenue of trees towards Cheddington Lodge. Development has the potential to affect the setting of these heritage assets and nearby listed buildings and could result in less than substantial harm. Proposals will be required to be supported by a robust Heritage Statement and setting analysis, and to incorporate appropriate mitigation through layout, design, landscaping and buffering... Development here would extend the north-western edge of Cheddington and could reduce the perceived separation between the village and Mentmore Park... A sensitive landscape treatment of the northern boundary is required.”
- TIN01 (Land at Parsonage Farm, Barton Road and west of Wood Lane, Tingewick) – “The site presents opportunities to improve the road access and other forms of access into the village. It can also improve the setting to close by heritage assets.”
- PAD01 (Land southwest of Buckingham Road, Padbury) – “... adjoins the Padbury Conservation Area, which contains a significant number of listed buildings. This area also includes Main Street, where a limited range of local shops and amenities are located, giving the site a close relationship with the historic core of the settlement... Vehicular access to the south-east parcel could be achieved from the A413. However, the applicant will need to demonstrate a suitable and deliverable vehicular access solution to serve development on the on the north-west parcel, considering the constraints and sensitivities of the surrounding area.”

- 9.9.5. Overall, there is a need for ongoing scrutiny of how historic environment constraint has factored in when considering the capacity of sites and their delivery trajectories. There is a need to factor in constraints at the plan-making stage as far as possible, to avoid a need to make compromises down the line in order to support site delivery.

DM policies

- 9.9.6. Policy BE3 (Heritage assets) is mostly nationally standard, but supporting text notably explains the following regarding non-designated heritage assets and archaeology:
- “Planning applications that could cause harm to non-designated heritage assets will not be supported by the Council. Where it is not practicable to retain a building which is a non-designated heritage asset, the council will expect to see a full appraisal... [and] may require a full record of the building to be made prior to demolition.
- There are a number of identified sites of archaeological importance, known as Archaeological Notification Areas, listed on the County Historic Environment Record system. From time-to-time other sites of archaeological interest may become apparent because of the planning process. The council is committed to protect these sites from development that would damage or endanger them and will afford protection to archaeological remains in accordance with their archaeological importance.
- Applications for development of sites containing or likely to contain archaeological remains will require an archaeological field evaluation... The council will expect... archaeological remains to be preserved, where possible... Where preservation in situ is not justified, the council will seek preservation by record. This involves digging the site, exposing and removing whatever archaeological remains are found and making a record of the findings. The developer will be required to make satisfactory arrangements for the excavation and recording of the archaeological remains and the publication of the results. This will be achieved by the imposition of suitable conditions...”

Conclusion

- 9.9.7. In conclusion, a **‘moderate or uncertain’ negative effect** is predicted. It is clear that historic environment constraints have informed site selection, but there is scope to add detail to site-specific policy. There will be a need to take account of comments received from Historic England as part of the Examination in Public.

9.10. Homes

Meet objectively assessed needs for housing and wider accommodation as far as possible. Deliver affordable housing and specialist housing / accommodation to meet needs, as far as possible, and ensure an appropriate housing mix in terms of size, type and tenure.

Strategy / sites / supply

- 9.10.1. The appraisal in Section 6 is supportive of growth scenario 1 on balance. The proposed supply would enable a housing requirement set at LHN over the plan period, which is a significant achievement given the scale of the plan / the number of allocations involved, but there would be a 'stepped' requirement. This suggests a case for an added emphasis on sites able to deliver in the earlier years of the plan period.

Strategic policies

- 9.10.2. SP2 (Housing strategy) is a key policy, but its effect is to summarise the proposed approach to strategy (including the stepped housing requirement) / sites / supply. There is support for the clarity of explanation, e.g. with a clear distinction between: A) the proposed housing requirement; and B) the identified supply (including a trajectory).
- 9.10.3. There will be a need for further work to confirm that there will be a five year housing land supply at the point of plan adoption (accounting for the need for either a 5% or 20% buffer and undersupply since the start of the plan period, i.e. since 2024) having accounted for latest monitoring data (recognising that supply will likely increase significantly as non-allocated sites gain planning permission ahead of plan adoption).
- 9.10.4. SP3 (Gypsy, traveller and travelling showpeople provision) is then the other key strategic policy for consideration. There is support for a major step-change in supply; however, the identified supply still falls significantly short of what is required in order to provide for development needs (see discussion in Section 5.2). Concerns are somewhat allayed by the potential for windfall sites to come forward in line with DM policy, most notably Policy HO7 (Gypsy, Traveller and Travelling Showpeople Accommodation), but there are nonetheless significant concerns, and it is understood that there are omission sites that are not allocated on balance, notably in the Green Belt. Finally, with regards to the suite of proposed allocations, none of the sites are known to be particularly challenging, for example in terms of onsite constraints or poor accessibility, but this is a matter for ongoing scrutiny, and there would be merit in further clarity regarding the distinction between the following sources of supply: A) new proposed sites; B) regularisation of currently unauthorised sites; and C) the intensification and/or intensification of existing sites (authorised or unauthorised). There is a need to avoid overly large sites and consider potential issues relating to an over-concentration of sites in one area, e.g. there is a concentration east of Chalfont St Peter. Also, with regards to the large number of pitches set to be delivered at NESS sites, whilst these are not relied upon to deliver supply in the early years of the plan period, there is a need to acknowledge that there could be delivery risks.

Site-specific policies

- 9.10.5. Site specific policies set out where Gypsy and Traveller pitches are required to be delivered, but do not specify where sites are expected to deliver other specialist accommodation. This matter is instead covered by area-wide DM policy.

DM policies

- 9.10.6. Policy HO2 (Affordable housing) is a key policy. In summary, in the North and Central areas of Buckinghamshire 25% affordable housing is expected to be delivered, whereas in East and South 40% affordable housing is expected to be achievable. For West area, 40% affordable housing is expected as a minimum on Greenfield sites but up to 40% on Brownfield sites. 59% of affordable housing should be for social rent.

9.10.7. Other key policies are:

- HO7 (Gypsy, traveller and travelling showpeople accommodation policy) – this is a key policy, as discussed. The supporting text explains: “It is important to identify sites that are sustainable economically, socially and environmentally; have access to services, facilities and potential sources of employment; and which will promote inclusive communities, but which will not be out of scale with or dominate nearby settled communities. When considering whether a proposed Gypsy and Traveller site would dominate settled communities, regard will be given to existing Gypsy and Traveller sites outside the Buckinghamshire boundary but still near the settled community.”
- H08 (Specialist housing) – “On sites delivering more than six hundred dwellings, at least 10% of homes should be provided to meet the housing needs of older people as C3 specialist older persons accommodation and/or C2 older person accommodation.”

Also, on sites delivering more than 150 homes: “... at least 4% of the affordable housing provision must be to meet the needs for other specialist and supporting housing (this includes, but isn't limited to, people with mental health needs, learning disabilities, autism, substance misuse issues, and people fleeing domestic abuse).”

The supporting text explains:

- The population of people aged seventy-five or over is projected to increase by 30,900, which is over 25% of the total population growth.
- There is a requirement to provide around 3,100 units of specialist older person housing (C3), 1,500 care home bedspaces (C2) and 750 supported housing units.
- Taking account of C2 completions and commitments, together with the proposed units to be delivered through allocations, a total of 4,750 units is expected over the plan period. This exceeds the identified need of 4,635 units and provides a reasonable allowance for potential under-delivery across sites and commitments.
- HO5 (Self and custom-build housing) – “On sites delivering 50 or more dwellings, provision will be made for serviced plots for self-build and custom housebuilding equivalent to at least 5% of the total number of market dwellings, unless...” Self and custom build housing represents an important means of providing for housing needs.
- IN1 (Infrastructure delivery) – it is important to highlight strict requirements for development to only come forward if the required infrastructure can be delivered. This is a key factor when committing to development trajectories for site allocations. The supporting text also explains:

“Larger developments or areas with multiple landowners frequently require shared or strategic infrastructure, such as main access roads, utility upgrades, walking and cycling networks, public transport links, or community and green infrastructure. To support coordinated delivery and avoid piecemeal arrangements, the policy expects collaboration between applicants. This might involve joint master planning, common design principles, agreed phasing strategies and/or cost sharing arrangements.”

Conclusion

- 9.10.8. In conclusion, a **‘moderate or uncertain’ positive effect** is predicted. In addition to the headline of providing for LHN over the plan period there are a range of other important considerations, including providing for Gypsy and Traveller accommodation needs.
- 9.10.9. It is important to emphasise the scale of the challenge in respect of identifying a supply of specific sites to deliver more than 91,000+ homes in the knowledge that these sites are committed to the extent that failing to deliver risks the presumption in favour of sustainable development. In this light the plan is a major achievement, but there is inevitably a need for further scrutiny through consultation.

9.11. Landscape

Protect and enhance the character, quality and setting of valued landscapes at all scales (most notably the Chilterns AONB). Recognise links to wider objectives (e.g. biodiversity, heritage). Design development with landscape as a key factor, including by taking a strategic approach to high quality green infrastructure linking to the wider landscape.

Strategy / sites / supply

- 9.11.1. The appraisal in Section 6 flags a potential concern with growth scenario 1. Constraints are widespread but a particular consideration is growth in the Vale of Aylesbury impacting on views from the Chilterns escarpment including from the Ridgeway.

Strategic policies

- 9.11.2. Policy SP13 (Natural environment and climate resilience) is broadly supportive of landscape objectives, but it is difficult to identify distinct policy choices / decisions that have been taken in response to local issues and opportunities. There is a requirement to take “a landscape character-based approach to considering proposals” but evidence is limited, which has created a challenge for spatial strategy / site selection.

Site-specific policies

- 9.11.3. Many site policies set out that development should be “landscape-led” and, in some cases, there is further detail provided to clarify what is required in practice. The following quotes are taken from policies and supporting text:

- NESS003 (Aylesbury NESS) – “Development must adopt a landscape-led approach which: a) Responds positively to the site’s edge of town and rural transition character; b) Reflects the existing field pattern and mature landscape features; and c) Integrates development into the surrounding townscape and countryside.”

Also, supporting text explains: “Strategic green gaps will play an important role in the spatial framework of the site. Land to the north associated with the River Thames floodplain will remain undeveloped, while a further gap to the south will be maintained to prevent coalescence with Bierton and to protect its setting...”

- NESS005 (Haddenham NESS) – “Development will respond to the site’s context, ensuring that landscape and visual impacts are appropriately mitigated, particularly along the A418 corridor and at the rural edge of the settlement.”
- NESS008 (Buckingham NESS) – “Watercourses, including the River Great Ouse and Padbury Brook, are key environmental features which influence the design and layout of development.”
- NESS010 (Princes Risborough NESS) – “The site is sensitive in landscape and visual terms, particularly in relation to views from the Chilterns National Landscape, the Ridgeway National Trail and the setting of Horsenden Conservation Area. These constraints can be addressed through a comprehensive masterplanning approach, incorporating sensitive design, structural landscaping and the retention and enhancement of green infrastructure... Green and blue infrastructure will form a core element of the design, structure development and supporting biodiversity, recreation and landscape integration... Strategic green gaps will be maintained to preserve separation between Princes Risborough and... Longwick.”

N.B. there is a need to consider the extent to which the proposed densification leads to a need to compromise on the vision set out in the adopted Princes Risborough SPD.

- NESS012 (Winslow NESS) – “The northern and eastern parts of the site form part of a wider open landscape which contributes to the separation between Winslow and nearby settlements, particularly Great Horwood.”

Policy requires: “... strategic green gaps to prevent coalescence...”

- HAD01 (Aston Road, Haddenham) – “The landscape is in good condition with moderate visibility and sensitivity. Guidance supports conservation and reinforcement, particularly protecting views towards the Chiltern escarpment. Key public views towards the escarpment should where possible be retained.”
- CHE02 (Land at Station Road, Cheddington) – “A Tree Preservation Order (TPO) applies to the tree-lined frontage along Station Road. This feature makes a positive contribution to local character and visual amenity and should be retained and enhanced. Development proposals will be required to be supported by a full arboriculture assessment to inform layout and design.”
- CHE01 (Land at Horton, Cheddington) – “Retain and enhance mature hedgerows and provides an appropriate landscaped buffer to the Grand Union Canal.”

- 9.11.4. Overall, there is the potential to further supplement site-specific policy with a view to further confidence that the sites can come forward without undue landscape impacts, and can do so in line with the committed delivery trajectory and without having to compromise on wider objectives. However, it is also acknowledged that there is a need to avoid unduly constraining future work on masterplanning and green infrastructure through the development management process. Turweston NESS site is one example of a policy where avoiding / mitigating landscape impacts could warrant further scrutiny, noting the concerns raised by West Northants Council at the sites engagement stage, although it is also acknowledged that the site benefits from being contained by HS2.

DM policies

- 9.11.5. Policy NE20 (Landscape character and visual amenity) requires consideration of landscape character, and explains: “There are four Landscape Character Assessments and an addendum which cover Buckinghamshire [as listed]... A review of the above Landscape Character Assessments was [very recently completed]...”

Conclusion

- 9.11.6. In conclusion, a ‘**moderate or uncertain**’ negative effect is predicted. There are some sites subject to notable and potentially significant constraint, and there is a need for scrutiny of site-specific policies through consultation.

9.12. Soils / resources

Ensure efficient use of land including a focus on avoiding the loss of best and most versatile agricultural land as far as possible. Support minerals and waste planning and seek to reflect circular economy principles.

Strategy / sites / supply

- 9.12.1. The appraisal in Section 6 flags a potential concern with growth scenario 1, albeit noting that the baseline scenario is one where growth continues at pace without a plan, and also that Buckinghamshire does not stand-out as constrained in the sub-regional context (such that there is no case for exporting unmet housing need).

Strategic policies

- 9.12.2. Agricultural land is not referenced across the strategic policies other than in respect of locating sites for large-scale renewables. A new national dataset has recently been published that adds considerably to our understanding of how the various grades of agricultural land are distributed across Buckinghamshire and more widely.
- 9.12.3. There is also very limited reference to planning for minerals resources and waste infrastructure within the Local Plan. For context, the latest situation in respect of a review of the Buckinghamshire Minerals and Waste Local Plan is set out [here](#), and overall there is a need to be cognisant of needs, including as planning for minerals and waste is important in terms of supporting housing growth and the local economy.

Site-specific policies

- 9.12.4. This is not a matter that is a focus of site-specific policy, which is likely appropriate as there is typically no potential to mitigate the loss of agricultural land, beyond accounting for agricultural land quality when deciding where to locate orchards and allotments. It is also the case that none of the site-specific policies refer to the possible need for minerals extraction ahead of development, but it is not clear that this is an issue.

DM policies

- 9.12.5. There are no DM policies dealing with agricultural land, which is potentially appropriate. Natural England may wish to comment further.

Conclusion

- 9.12.6. In conclusion, a **'moderate or uncertain' negative effect** is predicted, as there will be significant loss of BMV agricultural land. However, it is also acknowledged that the baseline scenario is one whereby growth comes forward without a Local Plan.

9.13. Transport

Support the achievement of modal shift from private car use to public and active transport, including through the location and design of development. Support the Local Transport Plan, for example in respect of strategic transport infrastructure upgrades, addressing congestion hotspots (and, in turn, supporting bus services) and future mobility.

Strategy / sites / supply

- 9.13.1. The appraisal in Section 6 flags a potential concern with growth scenario 1. Much work has been completed but given the scale of the plan there inevitably remain uncertainties. Two of the NESS sites stand out as questionable from a perspective of aligning with vision-led transport principles (Beachampton and Wing), and this is also the case for some wider aspects of the strategy including sites distributed across villages.

Strategic policies

- 9.13.2. SP10 (Infrastructure for transport, telecommunications, utilities, waste) states:
- “The strategic priorities for infrastructure are creating: a) A vision-led and sustainable transport network, prioritising walking, cycling and wheeling, public transport and rail-based movement, and supporting strategic transport corridors, mobility hubs and active travel infrastructure.”
 - “Development will be required to:
 - Demonstrate that adequate infrastructure capacity exists, or that necessary upgrades can be delivered in a timely and coordinated manner...
 - Be phased appropriately so that infrastructure is delivered alongside or in advance of development...
 - Avoid unacceptable cumulative impacts on transport networks, environmental assets or other infrastructure and services. The Council will identify critical infrastructure required to support strategic growth locations. Development will not be permitted where this infrastructure cannot be delivered in a timely manner.”
- 9.13.3. The implication is a need to be suitably confident that infrastructure is deliverable and will not result in problematic delays to the committed supply trajectory. This is a matter that has fed-in strongly to spatial strategy / site selection and work on site capacities, but planning for transport infrastructure alongside housing growth is inherently challenging at the scale of Buckinghamshire, such that this is a matter for ongoing scrutiny.

Site-specific policies

9.13.4. Transport requirements are a key focus of site-specific policy and supporting text, e.g.:

- NESS003 (Aylesbury NESS) – “A key element of this strategy is the delivery of the Northeast Aylesbury Link Road, which will provide a direct connection between the A413 and A418 and enable movement around the town. This will help to reduce pressure on the town centre and existing radial routes.”
- NESS004 (Cheddington NESS) – “Key components include the Horton Bypass, improvements to Station Road, and a new railway bridge to overcome existing constraints.”
- NESS005 (Haddenham NESS) – “Key measures include new site accesses, improvements to the A418 and surrounding junctions, and integration with the wider highway network.”
- NESS008 (Buckingham NESS) – “The Buckingham South Spine Road will provide a key route through the development and assist in distributing traffic... Improvements to key routes including the A413, A421 and local roads will be required to maintain safe and efficient operation. There is also a longstanding strategic aspiration for a Buckingham western relief road between the A421 and A422.”

N.B. there is a need for further scrutiny of deliverability, as discussed in Section 5.3.

- NESS010 (Princes Risborough NESS) – “... will deliver a Princes Risborough Infrastructure Package, to which smaller sites will need to make proportionate equitable contributions. This Infrastructure Package will include a Relief Road and various supporting network improvements. This will provide a complete new alternative route to the A4010... Developers will be required to coordinate the delivery...”
- NESS011 (Stoke Mandeville NESS) – “A comprehensive walking and cycling network will connect... to... the Aylesbury Gardenway and LCWIP routes.”
- NESS015 (Beachampton NESS) – “The transport strategy will include new strategic infrastructure, including spine roads and the Whaddon Bypass. Developers will be required to coordinate the delivery of these requirements.”
- NESS018 (Wing NESS) – “Connections will be provided to surrounding settlements including Leighton Buzzard.”

N.B. it appears that a cycle route to Leighton Buzzard could be challenging to deliver.

- CHE01 (Land at Horton, Cheddington) – “Proposals will be required to make proportionate contributions towards necessary transport and infrastructure improvements as identified in the Infrastructure Delivery Plan and future detailed assessments, to mitigate the cumulative impacts of development in the area. This will include, but is not limited to, provision of the Horton bypass, delivery of a westbound railway bridge and associated highway improvements to complement the existing level crossing, together with enhancements to bus services and active travel connections.”

9.13.5. A further key consideration is redevelopment impacting town centre car parking, e.g.:

- AYL07 (Friarscroft Car Park, Aylesbury) – “Friarscroft car park is in... Aylesbury town centre and close to the train station. The site is currently a multi-storey public car park, and any redevelopment of the site will need to demonstrate that parking can be re-provided, managed or offset at other town centre car parks...”
- HIW03 (Sword House and 11 Duke Street, Totteridge Road, High Wycombe) – “As Totteridge Road Car park is a town centre car park situated next to the High Wycombe train station, it is vital that any parking spaces lost are re-provided to maintain sufficient, easily accessible, public car parking... Development proposals should deliver a comprehensive redevelopment of the Totteridge Road car park and 11 Duke Street to provide new residential dwellings, while Sword House will be retained and continued in use for employment purposes. Proposals should demonstrate how delivery will be achieved including phasing and site assembly where relevant.”

- CHS01 (Star Yard, St Mary's Way, Old Town, Chesham) – “Given the site's role as a principal public car park serving Chesham Town Centre, proposals will need to demonstrate that adequate public parking provision remains available to support the vitality and viability of the town centre.”
 - CHS03 (Water Meadow Car Park, Chesham) – “The site is one of the main long stay car parks in Chesham... [used] by people who need to park all day to work in the town. As such it is vital that any parking spaces lost are re-provided to maintain sufficient, easily accessible, public car parking to maintain [the town's vitality].”
- 9.13.6. Overall, there are wide range of ambitious transport interventions but there is a need for ongoing scrutiny of deliverability / delivery risks, and there is a need to consider the extent to which re-provision of town centre car parking could lead to delivery risks.

DM policies

- 9.13.7. Supporting text to Policy TR1 (Transport requirements for new developments) explains:
- “All developments, excluding householder applications, will be required to demonstrate that they: a. Prioritise sustainable travel and integrate with existing sustainable transport infrastructure. d) provide access to a high quality, fully accessible, attractive public transport service. j) deliver mobility hubs in accessible locations which are close to community facilities on site and provide sustainable transport connections to wider services, in accordance with the Council's guidance.

A place-based approach to net zero transport should focus on solutions that create well-connected places and healthier, happier, more resilient communities. These objectives are critical to good planning, linking the imperative to reduce transport emissions with wider objectives related to decarbonisation, sustainable housing and employment growth and nature recovery.”

- 9.13.8. Policy TR2 (Transport improvements) is also a key policy. It sets out that the following schemes are safeguarded by the plan:
- Eastern Aylesbury Link Road (south) (between A41 and Mike Griffin Way).
 - Southern Aylesbury Link Road (between A41 and A413).
 - Southeast Aylesbury Link Road (between A413 and B4443).
 - Southwestern Aylesbury Link Road (between A4010 and A418).
 - Northeast Aylesbury Link Road (NESS Site) (between A413 and A418).
 - Wing West Link Road (between Cublington Road and Stewkley Road).
 - Buckingham South Link Road (between the A413 to the A421).
 - Princes Risborough Relief Road (between Shoot acre Lane junction with A4010 and Grove Lane junction with A4010 via the NESS site).
 - Whaddon bypass (between Coddimoor Lane and Nash Road).
 - Horton bypass (between B488 Horton Road / Station Road junction and B488 North via Land at Horton).
 - A421 capacity improvements (between Bottledump Roundabout and A421 / Coddimoor Road / Whaddon Road roundabout).
 - Winslow Link Roads (between A413 Buckingham Road and Great Horwood Road; and between Great Horwood Road and Little Horwood Road)
- 9.13.9. Finally, two policies of note are:
- TR7 (High Speed Two and East West Rail – delivery and restoration) – amongst other things, the supporting text explains:

“The Princes Risborough to Aylesbury line is currently a single-track line serving Monks Risborough and Kimble stations. Double tracking of this line was identified by Network Rail in their West Midlands and Chilterns Route Study 2017. This scheme would provide an increase in service capacity and therefore support the increased rail demand expected due the forecast housing and economic growth in Buckinghamshire.

The Council strongly supports the mid to long-term aspiration of Network Rail to double track the Princes Risborough to Aylesbury line. Albeit at an early stage of planning, it is appropriate to ensure that development adjoining the line does not prejudice the future implementation of this scheme.

In that context, applicants bringing forward proposals within 50 metres of the branch line are encouraged to consult Network Rail and operators at the earliest opportunity.”

- TR8 (Buckinghamshire Greenway) – the supporting text explains:

“The Buckinghamshire Greenway is the proposed flagship active travel route ‘spine’ running north-south across Buckinghamshire. The Greenway is identified in the Buckinghamshire LCWIP and will be an accessible, high quality active travel route that will connect people and communities.

.. To maximise the opportunities for walking, wheeling and cycling, the development of major sites (10 or more homes or employment equivalent) within 800 metres of the corridor will be required to make proportionate contributions to construction of the greenway and/or provide convenient links to the route, and sections of the route, where there is no obvious / overriding issues of topography, traffic or other severance and where it is practicable to create/deliver links and /or route sections.”

- 9.13.10. TR9 (Former Bourne End to High Wycombe to railway line) – “The development of major (10 or more homes or employment equivalent) sites within 800 metres of the corridor will be required to make proportionate contributions to construction of the route and/or provide convenient links to the route (and sections of the route where appropriate), in order to maximise the opportunities for walking, wheeling and cycling.”

Conclusion

- 9.13.11. In conclusion, a **‘moderate or uncertain’ negative effect** is predicted. The scale and ambition of the plan is very high, such that there is a need for further scrutiny through consultation, including with a view to building delivery certainty.

9.14. Water

Direct growth to minimise pressure on water resources and water quality, including accounting for wastewater treatment capacity and water quality hotspot areas (catchments and water resource zones). Realise opportunities for growth to support new / upgraded infrastructure.

Strategy / sites / supply

- 9.14.1. The appraisal in Section 6 flags a potential concern with growth scenario 1. There are inherent uncertainties regarding water resources and wastewater treatment, and it will be crucial to understand more through consultation with the Environment Agency and the water companies.

Strategic policies

- 9.14.2. SP13 (Natural environment and climate resilience) commits to:

“Working in partnership with the Environment Agency, Natural England and the water companies to protect, manage and improve water quality in Buckinghamshire, particularly the quality of water bodies which are currently failing to meet the Water Framework Directive (WFD) requirements...”

- 9.14.3. There is a need to make every effort to ensuring that the required partnership working feeds in as part of work to finalise the Local Plan.
- 9.14.4. Also, the Policy commits to: “Adopting higher water efficiency standards to contribute to alleviating water stress across the area.” This is a very positive step, including as water efficiency assists with minimising pressure on wastewater treatment works and the wastewater network. The associated DM policy is discussed below.

Site-specific policies

- 9.14.5. This is a matter covered by area-wide DM policy rather than site-specific policy.

DM policies

- 9.14.6. Policy CC3 (Water efficiency standards) is a key policy with development viability implications. It is clear that this is a matter that is being prioritised:

“All new dwellings are required to achieve a water efficiency standard of 85 litres per person per day – or future tighter national requirement. This is strongly supported by water companies in their responses since the Draft Plan stage and will help reduce water stress in the South East and preserve the Chalk Aquifer which supplies water to millions of people in Southeast England. It also supplies the surface waters and springs that flow into the Chilterns’ nine Chalk streams.”

- 9.14.7. Other policies of note:

- NE1 (Water quality) – “Development proposals will only be supported where they will not adversely affect the water quality of surface or underground water bodies (including rivers, canals, lakes, reservoirs, drinking water safeguard zones, source protection zones and groundwater aquifers).”
- NE2 (Watercourses and associated corridors) – “Development proposals for new development adjacent to or containing a watercourse are required to provide or retain at least a 10 metres natural buffer between the top of the watercourse bank and the development, with no lighting, and include a long-term landscape and ecological management plan (or habitat management and monitoring plan) for this buffer. Where the watercourse is a Chalk Stream or a ditch connected to a chalk stream, as listed in this policy, this natural buffer must be at least fifteen metres.”
- IN3 (Water infrastructure) – “Developments are required to demonstrate how they will be adequately served with foul drainage, wastewater and sewage treatment without leading to significant problems for existing users or contamination of waterbodies and water supply. Phasing conditions will be attached to planning permissions to ensure that new developments are not occupied until the required water supply, and wastewater capacity is in place.”
- Policy IN4 (Safeguarded strategic water services infrastructure) – “...safeguards two areas for regional water infrastructure needs. (a) Galley Lane near Stoke Hammond is safeguarded for water services infrastructure as part of the Grand Union Canal Water Transfer Project, as defined by Water Resources East Regional Plan 2025. (b) Land to the west of Iver WTW and the M25, as shown in the Policies Map, is safeguarded for drinking water treatment and water transfer infrastructure - Thames to Affinity Transfer (“T2AT”) is a proposed water transfer project from Thames Water to Affinity Water. It aims to deliver a resilient supply of drinking water to Affinity Water’s Central Region.”

Conclusion

- 9.14.8. In conclusion, a **‘moderate or uncertain’ negative effect** is predicted. There are significant risks and uncertainties in respect of both water supply and wastewater treatment, although there is support for the DM policy framework.

9.15. Conclusion

- 9.15.1. This section of the report has appraised the Proposed Submission Local Plan as a whole, which in practice involves recapping on the appraisal of Scenario 1 and layering on understanding of the development management (DM) policies that are proposed in order to ensure that growth is delivered effectively, in particular site-specific policies.
- 9.15.2. The appraisal finds that the plan as a whole performs as per Scenario 1, in summary: a **moderate or uncertain positive effect** under three topics (accessibility, economy / employment, homes); a **neutral effect** under one topic (biodiversity); and a **moderate or uncertain negative effect** under nine topics (air / env. quality, climate change adaptation, climate change mitigation, communities, historic environment, landscape, soils / resources, transport and water). The appraisal does not predict a significant negative effect under any of topic, but this is marginal in some cases.
- 9.15.3. With regards to DM policies, given forthcoming 'national development management policies' (as proposed by the draft NPPF, 2025) a key consideration is site-specific policies, which must respond to locationally specific issues and opportunities and be deliverable in light of viability parameters. It is clear that detailed work has gone into site-specific policies, but they are yet to be scrutinised by promoters and stakeholders.
- 9.15.4. There is support for concept masterplans having been prepared for the NESS sites, but there is a need to avoid false comfort and unduly constraining delivery (i.e. there is a need for flexibility, given the delivery timescales and many uncertainties).
- 9.15.5. With regards to area-wide DM policies, it is noted that these have been tested through a Viability Study, which concludes that the plan is deliverable within viability parameters, but there is a need for ongoing scrutiny of the balance that has been struck between competing policy priorities with cost / viability implications; on matter that has been prioritised is water efficiency. There is a natural role for SA in terms of highlighting potential additional policy requirements to address specific issues / risks, but additional requirements typically come with a cost and, in turn, knock on implications. It can be noted that a range of DM policy recommendations were also made within the Interim SA Report published as part of the Regulation 18 consultation in 2025.
- 9.15.6. Overall the scale and challenge of the Buckinghamshire Local Plan is potentially unprecedented nationally, and identifying sites to deliver 91,000+ homes – in the knowledge that these sites are committed to the extent that failing to deliver risks the presumption in favour of sustainable development – is a major achievement. It is also important to note that a very large amount of high quality evidence has been prepared in support of the plan, despite the inherent challenge of twin-tracking evidence-gathering and work on spatial strategy / site selection. However, there is inevitably a need for further scrutiny of the plan and its evidence base through consultation ahead of considering adjustments through the Examination in Public (see discussion below).

Cumulative effects

- 9.15.7. It is appropriate to end by presenting a summary discussion of 'larger-than-local' considerations relating to the Buckinghamshire Local Plan in combination with other local plans and wider plans and strategies:
- Accessibility – there are important cross-border considerations in respect of strategic community infrastructure, notably at the edge of Milton Keynes and Brackley.
 - Air / environmental quality – it is not clear that there are any major cross-border concerns, but traffic through Milton Keynes is one important consideration.
 - Biodiversity – given the proposed growth strategy, key cross-border considerations include the Greensand Ridge and Whaddon Chase (Milton Keynes), the River Great Ouse (West Northants) and the Chilterns Beechwoods (Dacorum).
 - Climate change adaptation – there are limited cross-border considerations, but one factor is River Great Ouse strategic flood water attention / catchment management.

- Climate change mitigation – this is clearly a headline ‘larger than local’ consideration, in that there is a need to deliver on national and global decarbonisation targets.
- Communities & health – the proposed growth strategy for Buckinghamshire could affect a number of neighbouring areas, notably Milton Keynes, Brackley, Leighton Buzzard, Thame, Tring and villages in the north of Dacorum.
- Economy & employment – the proposed employment land growth strategy is a proactive response to national objectives but this is a matter for ongoing scrutiny.
- Historic environment – one key matter is impacts to the setting of conservation areas and wider assets within and to the south east of Brackley (West Northants).
- Homes – the plan does not generate unmet need but neither does it provide for unmet need from elsewhere (notably Slough). The plan generates an unmet need for Gypsy and Traveller pitches, which was flagged as an issue at past consultation stages.
- Landscape – planning for the Chilterns National Landscape is a primary larger-than-local consideration, but there are also wider key national character areas that cross into neighbouring authorities, including the Greensand Ridge and Mid-Vale Ridge.
- Land / resources – protecting best and most versatile agricultural land is a national issue, and consideration can be given to the recent National Land Use Framework.
- Transport – this is a key larger-than-local consideration for ongoing scrutiny. There is a need to realise the EWR opportunity in full (with consideration given to a southern spur to Aylesbury) and deliver on objectives for key road corridors, e.g. the A421 (which links the MK and the M1 to the M40) and the A418 (Aylesbury to Oxford).
- Water – this is a major larger-than-local consideration, particularly in terms of water supply given the need for major infrastructure to store and transfer water. The capacity of wastewater treatment works can also cross over borders, although this is more of an issue for the south of Buckinghamshire, which is proposed lower growth.

Part 3: Next steps

10. Plan finalisation

- 10.1.1. Following the receipt of representations on the Proposed Submission Local Plan the aim is to submit the plan for examination in public alongside a summary of the issues raised. The Council will need to remain confident that the plan as previously published is sound and so ready for submission, and there will not be the potential to make amendments to the plan (although suggested amendments might be submitted alongside the plan).
- 10.1.2. This SA Report will also be submitted alongside the Local Plan.
- 10.1.3. Following submission the Local Plan will be subject to an Examination in Public overseen by one or more Planning Inspectors, and there will invariably be a consultation on proposed Main Modifications in order to address matters of plan soundness.
- 10.1.4. Once found to be sound following examination the Local Plan will be adopted, at which time an SA 'Statement' will present prescribed information including "measures decided concerning monitoring".

11. Monitoring

- 11.1.1. It will be important to monitor delivery of the plan, with a view to not only flagging where sites are not coming forward in accordance with the anticipated trajectory (i.e. sites are delayed or are not delivering to the anticipated capacity), but also where sites are coming forward with compromises made in terms of policy objectives. It could feasibly be the case that a selection of key sites are identified to be a focus of monitoring.
- 11.1.2. Considerations for future monitoring might include:
 - Accessibility – are sites delivering community infrastructure as anticipated?
 - Biodiversity – are sites delivering identified area-wide and site-specific requirements?
 - Climate change adaptation – is flood risk affecting the delivery of urban allocations and what steps are being taken avoid and mitigate risk accounting for climate change?
 - Climate change mitigation – are sites voluntarily proposing to exceed the requirements of Building Regulations such that they deliver as net zero developments?
 - Communities & health – are new sites delivering on key place-making priorities and are impacts to existing communities being avoided/minimised as anticipated?
 - Economy & employment – are key sites delivering or progressing towards delivery as anticipated? In general, employment land needs warrant regular monitoring as this will be an important consideration for a future local plan review, e.g. data centre needs.
 - Historic environment – are sites able to avoid and mitigate impacts to key assets in the manner envisaged by site-specific policies?
 - Homes – are sites delivering as anticipated alongside the full policy quota of affordable and specialist housing? Are Gypsy and Traveller allocations delivering and what is the rate at which windfall sites are coming forward in line with Policy HO7?
 - Landscape – are sites able to avoid and mitigate impacts to key assets in the manner envisaged by site-specific policies?
 - Transport – are sites able to deliver the transport upgrades envisaged by policies?
 - Water – is site delivery being impacted by uncertainties in respect of water supply / resources or capacity at wastewater treatment works?

Appendix I: Regulatory requirements

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

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

Questions answered		As per regulations... the SA Report must include...
Introduction	What's the plan seeking to achieve?	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
	What's the sustainability 'context'?	- Relevant environmental protection objectives, established at international or national level - Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
	What's the SA scope?	- Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan - The environmental characteristics of areas likely to be significantly affected - Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
	What's the sustainability 'baseline'?	Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
Part 1	What has plan-making / SA involved up to this point?	- Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) - The likely significant effects associated with alternatives - Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan
Part 2	What are the SA findings at this current stage?	- 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?	A description of the monitoring measures envisaged

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

<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>	i.e. answer - <i>What's the scope of the SA?</i>
(c) the environmental characteristics of areas likely to be significantly affected;	The relevant environmental protection objectives, established at international or national level		
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	i.e. answer - <i>What's the 'baseline'?</i>	
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The environmental characteristics of areas likely to be significantly affected		
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	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 C: 'Checklist' of how and where (within this report) regulatory requirements are reflected.

Regulatory requirement	Information presented in this report
Schedule 2 of the regulations lists the information to be provided within the SA Report	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 2 discusses the plan scope.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report. The outcome of scoping was an 'SA framework', which is presented within Section 3. The SA scope – in terms of key sustainability issues and objectives, including accounting for evolution of the baseline without the plan, and locationally specific issues – is then discussed throughout the report as appropriate, i.e. in light of the scope of the plan/alternatives.
c) The environmental characteristics of areas likely to be significantly affected;	
d) ... environmental problems which are relevant... ...areas of a particular environmental importance...;	
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	The Scoping Report presented a detailed context review and explained how key messages from this (and baseline review) fed into the 'SA framework', which is presented within Section 3. Also, policy context is discussed throughout this report. With regards to explaining “<i>how... considerations have been taken into account</i>”, Section 7 explains reasons for supporting the preferred option, i.e. how/why the preferred option is justified in-light of alternatives appraisal.
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	Section 6 presents alternatives appraisal findings in respect of reasonable alternative growth scenarios, whilst Section 9 presents an appraisal of the Local Plan as a whole. All appraisal work naturally involved giving consideration to the SA scope and the various effect characteristics.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan...	Section 9 presents recommendations but perhaps more importantly flags 'tensions' that can be a focus of further work ahead of plan finalisation.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Sections 4 and 5 deal with 'reasons for selecting the alternatives dealt with', with an explanation of reasons for focusing on growth scenarios / certain growth scenarios. Sections 7 explains reasons for supporting the preferred growth scenario, i.e. explains why supporting the preferred scenario is justified in-light of the appraisal of alternatives. Methodology is discussed at various places, ahead of presenting appraisal findings.
i) ... measures envisaged concerning monitoring;	Section 11 presents this information.
j) a non-technical summary... under the above headings	The NTS is presented at the start of the report.
The SA Report must be published alongside the draft plan, in-line with the following regulations	
Authorities... 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...	This SA Report is published alongside the Proposed Submission Local Plan in order to inform representations and then subsequent plan-making stages. Specifically, the next stage is expected to be examination in public.
The SA Report must be taken into account, alongside consultation responses, when finalising the plan.	
The environmental report prepared pursuant to Article 5 [and] the opinions expressed pursuant to Article 6... shall be taken into account during the preparation of the plan... and before its adoption or submission to the legislative procedure.	This SA Report will be taken into account when finalising the plan as part of the examination in public. It should also be noted that an Interim SA Report was published as part of a Regulation 18 consultation held in 2025, and then an SA Note was published at the site engagements stage in early 2026.

