



Cabinet agenda supplement

Date: Monday 13 September 2021

Time: 10.00 am

Venue: The Oculus, Buckinghamshire Council, Gatehouse Road, HP19 8FF

Agenda Item	Time	Page No
5 Question Time Question from Councillor Robin Stuchbury to Councillor Gareth Williams (Deputy Leader and Cabinet Member for Planning and Regeneration)		3 - 4

As you are aware a number of bodies were uncovered during excavations ahead of work at West End Farm, on Brackley Road in Buckingham for a planned care home. This included skeletons of 80 bodies with hands tied behind their backs. I would be grateful if the Cabinet Member for Planning and Regeneration could provide an interim report of the basic analysis of this major historic site to provide clarification of what took place and in what date period for local residents. I understand that some of the investigations have been halted due to financial issues between the developer and Network Archaeology, which have been ongoing for some considerable time, and if this is the case what action can be taken by the Council to bring this to a quick resolution ?

7 Adoption of the Vale of Aylesbury Local Plan		5 - 22
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For further information please contact: Craig Saunders -
democracy@buckinghamshire.gov.uk on 01296 585043, email
democracy@buckinghamshire.gov.uk.

Question from Councillor Alison Wheelhouse to Councillor Gareth Williams, Deputy Leader and Cabinet Member for Planning and Regeneration

“Given recent multiple Permitted Development “prior notification” applications for 15m high mobile phone masts across the county, and in view of the recently completed Government consultation on this topic, please will the Cabinet Member for Planning and the Leader ensure that: **1.** a new Electronic Communications Supplementary Planning Document be implemented as soon as possible; and **2.** that an Article 4 Direction be made without delay in relation to permitted development rights for electronic communications masts and cabinets, so that these will require planning consent and can be called-in to planning committee. The SPD and Art.4 Directions are needed for the following reasons:

- To avoid piecemeal applications for masts and associated cabinets from multiple carriers and to implement a strategic overview.
- The need for a clear policy on mast sharing, site sharing and a requirement for submission of data on existing availability and sharing facilities in any given area.
- To maximise the use of existing sites and masts.
- Much distress is being caused to communities by carriers making unsuitable prior notification applications under the current permitted development rules, leaving communities with limited voice on the matter. This issue will be further aggravated if proposals are implemented as set out in the Government’s recently completed technical consultation, which would allow masts up to 15m as permitted development without need for prior approval.

In summary, could the Cabinet Member please confirm what steps the Council intends to take to address the points raised above at 1. and 2.?”

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Supplementary Report to Cabinet

Date:	13 September 2021
Reference number:	NA
Title:	Adoption of the Vale of Aylesbury Local Plan (VALP)
Cabinet Member(s):	Gareth Williams, Deputy Leader and Cabinet Member for Planning and Regeneration
Contact officer:	Peter Williams
Ward(s) affected:	Buckingham East, Buckingham West, Winslow, Grendon Underwood, Great Brickhill, Stone and Waddesdon, Wing, Ivinghoe, Bernwood, Aston Clinton and Berton, Wendover, Aylesbury East, Aylesbury South East, Aylesbury South West, Aylesbury West, Aylesbury North West and Aylesbury North.
Recommendations:	<p>That, in addition to the recommendations in the substantive report, Cabinet is asked to recommend to full Council to:</p> <ul style="list-style-type: none"> i) Amend a minor error regarding a site area referred to in paragraph 2.1 of this supplemental report, ii) Delegate authority to make further minor amendments that will not alter the implementation of the plan to the Cabinet Member for Planning and Regeneration in consultation with the Service Director Planning and Environment and iii) note the final Sustainability Assessment Report (as attached)
Reason for decision:	To address minor errors in the VALP and ensure that the Sustainability Appraisal Report is taken into account at the point of adoption

1. Executive summary

- 1.1 The council has been made aware of a minor error in the Vale of Aylesbury Local Plan (VALP) regarding a site area which needs to be amended to reflect the correct area as shown on the Proposals Map. To address any further such minor errors in the document as may come light it is also recommended that delegated authority be given as described to allow for their correction without resort to Council.
- 1.2 The final Sustainability Appraisal (SA) Report is also being circulated with this supplementary report so that it can be so taken into account at the point of adoption.

2. Content of report

- 2.1 The Vale of Aylesbury Local Plan (VALP) 2013-2033 allocates a site at Fremantle Court to the south of Stoke Mandeville for C2 development or Extra Care Housing. The site area shown on the Aylesbury Inset Map is correct, but the area of the site is not correctly stipulated in the associated text of policy H6b. The policy indicates that the site area is 0.38ha when the actual site area equates to 4.8 hectares. It is therefore necessary to correct this figure for accuracy. This will not affect the implementation of the policy or the allocation as the site are is correctly shown on the relevant inset map.
- 2.2 It is permissible for the Council to make amendments to minor errors post-adoption where those amendments will not affect the implementation of the plan. It is therefore suggested that the power to make such changes should be delegated to the Cabinet Member for Planning and Regeneration in consultation with the Service Director Planning and Environment.
- 2.3 The VALP has been subject to a Sustainability Assessment process during its production and in his report the Inspector has confirmed that the council has met the legal requirement to carry out such an assessment. When the plan is to be adopted it is a legislative requirement that a final Sustainability Assessment (SA) Report is published alongside the plan. The final SA Report for VALP is therefore attached for member's consideration as part of the VALP adoption process.

3. Other options considered

- 3.1 It is not considered that there are other options besides those covered in the report and its recommendations

4. Legal and financial implications

- 4.1 Proceeding with minor inaccuracies in the VALP would be unlikely to have legal implications, but the change will ensure the small risk from such a situation is negated. The same can be said of the recommendation for a delegation. Adherence to the Regulations associated with the SA report is essential to avoid the risk of legal challenge on the basis of improper process.
- 4.2 There are no financial implications arising from the recommendations.

5. Corporate implications

- 5.1 There are no corporate implications apart from those already set out in the main report.

6. Local councillors & community boards consultation & views

- 6.1 No consultation has been carried out with local Councillors or Community Boards on this final stage because of the nature of the decision required. However local Councillors have been closely involved in the preparation of the Plan at earlier stages.

7. Communication, engagement & further consultation

- 7.1 No further consultation or engagement has been carried out on this matter.

8. Next steps and review

- 8.1 Following adoption, the VALP will form the basis for planning decisions in the plan area. It will also serve as the strategic policy context for neighbourhood plans. It will be replaced by the new Buckinghamshire Local Plan once it is finalised. It should be noted that the Buckinghamshire Local Plan is still in its early stages and is projected to be adopted in 2025.

9. Background papers

- 9.1 The documentation associated with the preparation of VALP and its Examination can be seen via the following link: [Vale of Aylesbury Local Plan \(VALP\) 2013-2033 | Buckinghamshire Council | Aylesbury Vale Area \(aylesburyvaledc.gov.uk\)](https://www.aylesburyvaledc.gov.uk/valp-2013-2033)
- 9.2 The full text of the SA Report is out at Appendix A of this report.

10. Your questions and views (for key decisions)

- 10.1 If you have any questions about the matters contained in this report please get in touch with the author of this report. If you have any views that you would like the cabinet member to consider please inform the democratic services team. This can be done by telephone 01296 382343 or email democracy@buckinghamshire.gov.uk.

Sustainability Appraisal (SA) of the Vale of Aylesbury Local Plan (VALP)

SA Statement

September 2021

REVISION SCHEDULE					
Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	Sept 2021	SA Statement published alongside the adopted version of VALP	Mark Fessey Associate Director	Steve Smith Technical Director	Steve Smith Technical Director

Limitations

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TABLE OF CONTENTS

1	INTRODUCTION.....	1
2	THE PLAN-MAKING / SA ‘STORY’	2
	2.1 Introduction	2
	2.2 Early plan-making / SA stages 2014 - 2016	2
	2.3 SA Report 2017.....	2
	2.4 SA Report Addendum 2019	4
	2.5 SA Report Addendum 2020	6
	2.6 Plan finalisation 2021	8
3	MEASURES DECIDED CONCERNING MONITORING.....	9
4	CONCLUSIONS ON THE SA PROCESS.....	9

1 INTRODUCTION

Background

- 1.1.1 Aylesbury Vale District Council (now subsumed within Buckinghamshire Council) submitted the Vale of Aylesbury Local Plan (VALP) to the Secretary of State for Housing, Communities and Local Government on 28th February 2018 for examination by an appointed Planning Inspector.
- 1.1.2 The Planning Inspector issued his final report to the Council in September 2021, finding the Plan ‘sound’ subject to certain modifications. The next stage will be for the Council to formally adopt the Local Plan.
- 1.1.3 A parallel process of Sustainability Appraisal (SA) was undertaken alongside plan-making. SA is a mechanism for considering and communicating the likely effects of an emerging plan, and reasonable alternatives, with a view minimising negative impacts and maximising positives.
- 1.1.4 Also, at this point there is a need to briefly note the **Habitats Regulations Assessment (HRA)** undertaken alongside plan-making, the conclusion of which is reported in Box 1.1.

A note on the Local Plan HRA

VALP was subject to HRA, with reports produced at key junctures. Reports are available at: www.aylesburyvaledc.gov.uk/habitats-regulations-assessment.

The HRA concludes that no adverse effects on the integrity of the protected site network will result from VALP, either alone or in combination with other plans or projects. The Council consulted with Natural England who did not object to the findings. The Council is therefore satisfied that VALP complies with the requirements of The Conservation of Habitats and Species Regulations 2017 (as amended).

SA explained

- 1.1.5 It is a requirement that SA involves a series of procedural steps. The final step in the SA process involves preparing a ‘statement’ at the time of plan adoption. This SA Statement presents:
- 1) The ‘story’ of plan-making / SA up to the point of adoption.
Specifically, there is requirement¹ to: *“summaris[e] how environmental considerations have been integrated into the plan....and how the environmental report... the opinions expressed... and the results of consultations... have been taken into account... and the reasons for choosing the plan... as adopted, in the light of the other reasonable alternatives dealt with.”*
 - 2) Measures decided concerning the monitoring of plan implementation.
Specifically, there is a need to explain *“the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.”*

This SA Statement

- 1.1.6 This is the VALP SA Statement, and considers **(1)** and **(2)** in turn.
- 1.1.7 This Statement concludes by presenting a checklist of legal requirements, with a view to demonstrating the legal compliance of the SA process undertaken with the SEA Regulations.

¹ The information to be provided in the Statement is listed in Article 9 of the Strategic Environmental Assessment (SEA) Directive (2001/42/EC) and Regulation 16 of the Environmental Assessment of Plans and Programmes (SEA) Regulations.

2 THE PLAN-MAKING / SA 'STORY'

2.1 Introduction

2.1.1 Key steps in the SA process were as follows:

- 1) Early plan-making / SA stages **2015 - 2016**
- 2) The SA Report was published alongside the Proposed Submission Plan in **2017**
- 3) An SA Report Addendum was published alongside proposed modifications in **2019**
- 4) An SA Report Addendum was published alongside further proposed modifications in **2020**
- 5) The Inspector's Report was published confirming required modifications in **2021**

2.1.2 Each step in the process is discussed, in turn, below. All SA documents are available at:
<https://www.aylesburyvaldc.gov.uk/sustainability-appraisal-sa>

2.2 Early plan-making / SA stages 2014 - 2016

2.2.1 An SA Scoping Report was published for consultation in **September 2015**. This presented a review of evidence leading to identification of key sustainability issues and a draft SA Framework, in the form of a list of sustainability objectives. The SA scope was then a focus of discussion within Section 3 of the SA Report (2017), and within Appendix 2 of the report.

2.2.2 Interim SA Reports were then published alongside the VALP Issues and Options consultation document in 2015 and the VALP Draft Plan consultation document in 2015. Both Interim SA Reports presented useful analysis, albeit analysis that is now very dated. Analysis from both reports was discussed in Section 6 of the SA Report (2017), which dealt with establishing reasonable alternatives. For example, see [pages 18-19](#) of the report.

2.3 SA Report 2017

2.3.1 AECOM was commissioned to lead on the SA process in late 2016, and then worked closely with officers over the course of 2017, leading to publication of the SA Report in September 2017.

2.3.2 The SA Report was structured in three parts in order to answer the following questions:

1. What has plan-making / SA involved **up to this point?**
 - Including in relation to 'reasonable alternatives'.
2. What are the SA findings **at this stage?**
 - i.e. in relation to the draft plan.
3. What happens **next?**

2.3.3 Each part of the SA Report is considered in turn below.

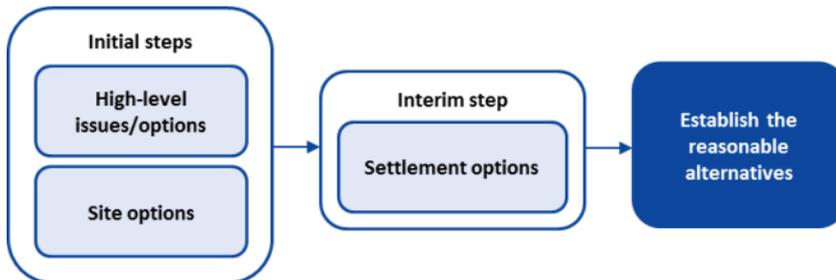
Part 1: What has plan-making / SA involved up to this point?

2.3.4 In summary (and as explained on [page 3](#) of the SA Report Non-technical Summary), the primary aim was to explain a three stage process of giving consideration to reasonable alternatives:

- 1) Defining reasonable alternatives
- 2) Appraising reasonable alternatives
- 3) Selecting the preferred option

2.3.5 The task of **defining reasonable alternatives** is invariably challenging in the context of Local Plans, and the VALP was no exception. The process of defining reasonable alternatives was reported across Sections 5 and 6 of the SA Report (49 pages in total) and a technical annex (134 pages). The process was summarised in a flow diagram, which is shown below.

Figure 2.1: The process of establishing reasonable alternatives in 2017



2.3.6 As part of the process, consideration was given to consultation responses previously received, in-line with the spirit of the SA process. For example, paragraph 6.3.14 of the report (also see the discussion of ‘screening settlements’ in the technical annex) explains that consultation responses from 2016 informed thinking on reasonable growth options for villages.

2.3.7 The process ultimately led to definition of nine reasonable alternatives, essentially in the form of alternative key diagrams. These were presented in tabular and graphic form across pages 46 – 56 of the SA Report, as well as within the Non-technical Summary.

2.3.8 The **appraisal of reasonable alternatives** was then presented in detail in Appendix 3 of the SA Report, and in summary within Section 7. As is invariably the case, all options were found to have pros and cons, although an overall message highlighted by the appraisal was that:

“Options involving a concentration of growth, and in particular options involving a new settlement, are notable for performing best in terms of a several sustainability topics; however, the appraisal also serves to indicate draw-backs.”

2.3.9 As part of the appraisal, consideration was given to consultation responses previously received, in-line with the spirit of the SA process. For example, on page 142, as part of the appraisal discussion under the ‘communities’ heading, the report explains:

“Quite a clear message received through consultation in 2016 - notably from Buckinghamshire County Council and Chiltern, Aylesbury Vale and Milton Keynes Clinical Commissioning Groups (NHS) - was that there is merit to concentrating growth in such a way that critical mass is achieved, thereby enabling infrastructure delivery.”

2.3.10 The reasons for **selecting the preferred option**, in light of the alternatives appraisal, were then presented in Section 8 of the report. The text here, which was naturally prepared by officers as opposed to AECOM, set out reasons under ten headings, and concluded:

“Whilst the alternatives appraisal has highlighted some drawbacks with Option 3 it is considered the most sustainable of the options. Option 3 also reflects the findings from other evidence documents and takes account of feedback from the previous public consultations...”

Part 2: What are the SA findings at this stage?

2.3.11 Section 10 of the SA Report presented an appraisal of the Proposed Submission Plan under the SA framework, with a final section (Section 10.14) presenting overall conclusions (which were also presented in the Non-technical Summary) as well as a short summary discussion of cumulative (or ‘in combination’) effects, namely the effects of VALP in combination with other plans, strategies etc, including other adopted and emerging Local Plans.

2.3.12 In brief, the appraisal found the plan to perform well in many respects, but raised concerns in respect of loss of best and most versatile agricultural land, flood risk and water quality.

2.3.13 As part of the appraisal, consideration was given to consultation responses previously received. For example, paragraph 10.7.1 discussed concerns raised by Historic England in respect of the South West Aylesbury allocation.

Part 3: What happens next?

2.3.14 Sections 12 and 13 of the SA Report explained next steps including eventual monitoring of the adopted Local Plan. Matters that might be a focus of monitoring were suggested, drawing upon the appraisal presented in Section 10.

2.4 SA Report Addendum 2019

2.4.1 Following submission of VALP and supporting documentation (including the SA Report) in early 2018 there was a series of examination hearings in summer 2018, before the Inspector then set out his interim findings.

2.4.2 AECOM then worked closely with officers over the course of approximately one year, leading to publication of an SA Report Addendum alongside a schedule of Proposed Modifications (to the plan as previously submitted) in October 2019.

2.4.3 The SA Report Addendum was structured in three parts (as per the SA Report):

1. What has plan-making / SA involved **up to this point?**
 - Including in relation to 'reasonable alternatives'.
2. What are the SA findings **at this stage?**
 - i.e. in relation to the draft plan.
3. What happens **next?**

2.4.4 Each part of the SA Report Addendum is considered in turn below.

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

2.4.5 As per Part 1 of the SA Report, the task was to explain a three stage process of giving consideration to reasonable alternatives:

- 1) Defining reasonable alternatives
- 2) Appraising reasonable alternatives
- 3) Selecting the preferred option

2.4.6 The process of **defining reasonable alternatives** was reported across Sections 4 and 5 of the report, across approximately five pages. Efforts were made to keep the discussion relatively brief (in comparison to the equivalent discussion within the SA Report), in the knowledge that readers would be likely to have a good understanding of the context, particularly given the Inspector's interim findings and subsequent correspondence with the Council.

2.4.7 The first step was to explore the question: "Reasonable alternatives in relation to what?" As part of this, consideration was given to the possibility of exploring reasonable alternatives in relation to the matter of C2 older persons accommodation; however, ultimately the decision was made to focus on the 'spatial strategy', as per the SA Report.

2.4.8 In order to arrive at reasonable spatial strategy alternatives, the first step was to consider the strategic context, including the guidance provided by the Inspector – see Section 5.2. This led to a conclusion that the task was to allocate land to deliver around 1,150 homes on the edge of Milton Keynes.

- 2.4.9 The next step was to consider each of the site options available and potentially in contention for allocation – see Section 5.3. As part of this process, weight was given to the objective of avoiding “piecemeal” urban extension. In turn, sites and site combinations with clear potential to deliver a strategic urban extension were favoured.
- 2.4.10 Finally, Section 5.4 arrived at the conclusion that were three reasonable alternative approaches to delivering an additional c.1,150 homes on the edge of Milton Keynes.
- 2.4.11 The **appraisal of reasonable alternatives** was then presented in detail in Appendix 1 of the SA Report, and in summary within Section 6. As is invariably the case, all options were found to have pros and cons, although an overall message highlighted by the appraisal was that:
- “The appraisal serves to highlight Shenley Park as performing relatively well in respect of several objectives; however, it does not necessarily follow that this site is the most suitable or sustainable overall, as the various objectives are not assigned any weighting. For example, the appraisal serves to highlight Shenley Park as performing relatively poorly in respect of heritage objectives, and the Council - as decision-makers - might assign particular weight to this matter. Equally, Shenley Park is judged to perform less well than Salden Chase Extension in respect of ‘Communities’ objectives, due to uncertainties in respect of secondary school delivery, and the Council might assign particular weight to this.”*
- 2.4.12 As part of the appraisal, consideration was given to consultation responses previously received, in particular the representations received from the respective site promoters. This meant that the appraisal was undertaken with a good understanding of what each site might deliver, by way of infrastructure, albeit noting that proposals could well be subject to change.
- 2.4.13 The reasons for **selecting the preferred option**, in light of the alternatives appraisal, were then presented in Section 7 of the report. The text here, which was naturally prepared by officers as opposed to AECOM, sought to emphasise that a wide range of detailed technical evidence gathering was undertaken to inform the decision on a preferred option, reflecting the difficult nature of the choice at hand. The preferred option was, and remains, Shenley Park.

Part 2: What are the SA findings at this stage?

- 2.4.14 Section 9 of the SA Report Addendum presented an appraisal of those Proposed Modifications deemed to have the potential to result in a significant effect, following a ‘screening’ process set out in Section 8. Efforts were made to draw a distinction between A) the effects of the Proposed Modifications (recognising the scope of the consultation); and B) the effects of ‘the Submission VALP in combination with Proposed Modifications’.
- 2.4.15 Focusing on the Proposed Modifications, the appraisal concluded broadly positive effects in respect of most SA objectives, but raised a concern in respect of
- Flood risk – given a risk of C2 development being directed to Flood Zone 2.
 - Landscape – given the proposed Shenley Park allocation, making the following recommendation: *“It is noted that development of this site will be guided by an SPD; however, it is nonetheless recommended that this policy might ‘go further’ by specifying broad areas within the site that are more sensitive, from a landscape perspective.”*
 - Agricultural land – explaining that *“whilst the new proposed allocation at Shenley Park will avoid the loss of ‘best and most versatile’ (BMV) agricultural land, the (much smaller) new proposed allocation of WIN020 does comprise BMV land. This site is an existing allocation within the Winslow Neighbourhood Plan; however, it is unimplemented and the Neighbourhood Plan is set for review.”*

Part 3: What happens next?

- 2.4.16 Sections 10 and 11 of the SA Report Addendum explained next steps including eventual monitoring of the adopted Local Plan. Matters that might be a focus of monitoring were suggested, drawing upon the appraisal presented in Section 9.

2.5 SA Report Addendum 2020

2.5.1 Following consultation on Proposed Modifications officers reviewed consultation responses received, alongside other new sources of evidence, and determined that there was a need for a further consultation on Further Proposed Modifications.

2.5.2 AECOM then worked closely with officers in late 2020, leading to publication of an SA Report Addendum alongside a schedule of Further Proposed Modifications in December 2020.

2.5.3 The SA Report Addendum was structured in three parts (as per the two previous reports):

1. What has plan-making / SA involved **up to this point?**

- Including in relation to 'reasonable alternatives'.

2. What are the SA findings **at this stage?**

- i.e. in relation to the draft plan.

3. What happens **next?**

2.5.4 Each part of the SA Report Addendum is considered in turn below.

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

2.5.5 As per Part 1 of the two previous reports, the task was to explain a three stage process of giving consideration to reasonable alternatives:

- 1) Defining reasonable alternatives
- 2) Appraising reasonable alternatives
- 3) Selecting the preferred option

2.5.6 The process of **defining reasonable alternatives** was reported across Sections 4 and 5 of the report, across approximately seven pages. The first step was to explore the question "reasonable alternatives in relation to what?", which led to a conclusion that efforts should focus on the approach to modifying Policy H6B, which deals with C2 older persons accommodation.

2.5.7 In order to arrive at reasonable spatial strategy alternatives, the first step was to consider the strategic context – see Section 5.2. This led to high-level conclusions on:

- Quanta – *"Policy H6b allocations must ideally provide for 465 units over the period 2020 to 2025 (93 home annual requirement x five years)."*
- Distribution – the report explained that, whilst there is limited guidance on broad distribution and site selection principles for C2 older persons accommodation, it is possible to cautiously make several points, for example in respect of public transport accessibility.

2.5.8 The next step was to consider each of the site options available and potentially in contention for allocation – see Section 5.3. As part of this process, Appendix 1 presented a comparative discussion of each of the competing site options under each of the SA framework headings.

2.5.9 Finally, Section 5.4 concluded that were four reasonable alternative approaches to modifying Policy H6b so as to provide for additional C2 older persons accommodation. The alternatives were presented in a table alongside a supporting map, showing the location of the component sites. The table of reasonable alternatives is reproduced below, as Figure 2.2.

Figure 2.2: C2 older persons accommodation reasonable alternatives (2020)

Source of supply		# units			
		Option 1	Option 2	Option 3	Option 4
Allocations published within the Modified VALP (2019)		168	168	168	168
New allocations	Land north of Aston Clinton Road, Weston Turville (care home)	5	5	5	5
	Bartletts Residential Home, Peverel Court, Portway Road, Stone	12	12	12	12
	Mandeville Grange Nursing Home, Wendover Road, Stoke Mandeville	16	16	16	16
	Land at the Winslow Centre, Winslow	53	53	53	53
	Land adjacent to Martin Dalby Way/Paradise Orchard, Berryfields	60	60	60	60
	Leys House, Whaddon Road, Newton Longville	-	60	-	60
	Fremantle Court, Risborough Rd, Stoke Mandeville	-	-	100+	100+
Total supply		314	374	414+	474+
# units above/below requirement (465 units)		-151	-91	-51	+9

2.5.10 The **appraisal of reasonable alternatives** was then presented in detail in Section 6. As is invariably the case, all options were found to have pros and cons, although an overall message highlighted by the appraisal was that:

“Option 1 stands out as performing well in respect of greatest number of topics; however, it does not necessarily follow that it performs best overall, noting that it performs poorly in respect of three topics (and given that this appraisal does not assign weight to the topics, nor assume that the topics have equal weight)”

2.5.11 As part of the appraisal, consideration was given to consultation responses previously received, in particular the representations received from the respective site promoters. This meant that the appraisal was undertaken with a good understanding of what each site might deliver, by way of infrastructure, albeit noting that proposals could well be subject to change.

2.5.12 The reasons for **selecting the preferred option**, in light of the alternatives appraisal, were then presented in Section 7 of the report. The text here, which was naturally prepared by officers as opposed to AECOM, sought to emphasise the difficult nature of the choice of hand. Amongst other things, the statement explained:

“Although Fremantle Court performs relatively poorly against some indicators, particularly climate change, landscape and transport, it is considered that the need for C2 accommodation weighs strongly in favour of option 3. Also, the negative effects of including Fremantle Court can be offset by specific requirements in the policy which will limit the negative impacts.”

Part 2: What are the SA findings at this stage?

- 2.5.13 Section 9 of the SA Report Addendum presented an appraisal of those Further Proposed Modifications deemed to have the potential to result in a significant effect, following a ‘screening’ process set out in Section 8. Efforts were made to draw a distinction between A) the effects of the Further Proposed Modifications (recognising the scope of the consultation); and B) the effects of ‘the Submission VALP in combination with Further Proposed Modifications’.
- 2.5.14 Focusing on the Proposed Modifications, the appraisal concluded broadly positive effects in respect of most SA objectives, but raised a concern in respect of:
- Climate change mitigation – because one of the new allocations for C2 older persons accommodation is located in an isolated location, potentially leading to car dependency;
 - Housing – because the combined capacity of the new proposed allocations for C2 older persons accommodation falls short of the established need / target figure).

Part 3: What happens next?

- 2.5.15 Sections 11 and 12 of the SA Report Addendum explained next steps including eventual monitoring of the adopted Local Plan. Matters that might be a focus of monitoring were suggested, drawing upon the appraisal presented in Section 9.

2.6 Plan finalisation 2021

- 2.6.1 Resumed hearings were held in summer 2021, to discuss specific key matters still outstanding, following the two consultations on Proposed Modifications.
- 2.6.2 The Inspectors Report was then published in September 2021, setting out conclusions on Modifications necessary to enable the plan to be adopted, and reasons for finding the plan, as modified, to be ‘sound’, having regard to the tests of soundness set out in the NPPF.
- 2.6.3 The Inspectors Report discusses many of the same issues that have been a focus of the SA process, over the years. For example:
- Spatial strategy – Issue 1 within the Inspector’s Report deals with “whether the Spatial Distribution Strategy is sound”, whilst Issue 3 deals with “whether housing needs would be effectively met”. These two matters – distribution and growth quantum – were a focus of detailed alternatives appraisal work in 2017, as reported in the SA Report (2017).
 - Edge of Milton Keynes – paragraph 174 of the Inspector’s Report discusses the pros and cons of the three competing site options on the edge of Milton Keynes that were a focus of the alternatives appraisal presented in the 2019 SA Report Addendum.
 - Shenley Park – this site was a focus of appraisal within the 2019 SA Report Addendum. Importantly, the Inspector clarifies that the site can, and likely will, be developed in full, and that this would not lead to unacceptable landscape impacts, given site-specific policy criteria.
 - Land to the east of Great Horwood Road, Winslow – this site was a ‘variable’ within the reasonable alternatives that were a focus of the SA Report (2017), and hence was a particular focus of appraisal within that report.
 - Land east of Walnut Drive and west of Foscombe Road, Maids Moreton – whilst not a ‘variable’ within the reasonable alternatives that were a focus of the SA Report (2017), this site was a variable within the Maids Moreton specific reasonable alternatives that were appraised as part of the process of arriving at overall, district-wide reasonable alternatives. Subsequently, in June 2020, a note was prepared by AECOM and submitted to the [examination library](#) (document ED264) to present a stand-alone discussion of this site, from an SA perspective.
 - Housing for older people – this matter was a focus of alternatives appraisal work within the 2020 SA Report Addendum. The Inspector’s Report concludes that the preferred approach, as published for consultation as a Proposed Modification in 2020, is sound.

3 MEASURES DECIDED CONCERNING MONITORING

- 3.1.1 As discussed above, Part 3 of the SA Report (2017) included a discussion of ‘measures envisaged concerning monitoring’. That discussion was then updated in the two subsequent SA Report Addenda, with the second Addenda (2020), explaining:

“The submitted SA Report (2018) suggested the need to consider an increased focus on flood risk, waste-water treatment upgrades (and water quality more generally), delivery of low carbon infrastructure; and travel patterns associated with residents of new garden communities. These recommendations broadly hold-true in light of the 2019 proposed modifications and 2020 further proposed modifications.

The 2019 SA Report Addendum reported that the 2019 proposed modifications potentially give rise to a need to consider closely monitoring low carbon measures at the new proposed Shenley Park strategic allocation.

At the current time, the further proposed modifications potentially give rise to a need to consider closely monitoring C2 accommodation provision, with a view to identifying any deliverability issues at the earliest opportunity. There is also a need to closely monitor changes to uses in town centres.”

- 3.1.2 The discussion under Issue 7 within the Inspector’s Report deals with the Council’s proposed approach to monitoring, with a focus on monitoring so as to ensure measures are taken to rectify any issues with the housing supply trajectory, including triggering a review of the Local Plan.
- 3.1.3 The Council will reflect the Inspector’s conclusions in its Annual Monitoring Report.

4 CONCLUSIONS ON THE SA PROCESS

- 4.1.1 This SA Statement demonstrates a robust SA process progressed alongside plan-making, with appraisal findings and consultation responses feeding in to decision-making at key junctures.
- 4.1.2 Most importantly, in terms of compliance with both the SEA Regulations² and Local Planning Regulations,³ the SA Report was published alongside the proposed submission version of the Local Plan in September 2017, presenting an appraisal of “the plan and reasonable alternatives” and “an outline of the reasons for selecting the alternatives dealt with”. The report served to inform representations on the plan, and then served to inform plan finalisation.
- 4.1.3 This SA Statement is the final step in the SA process. Its aim is to explain the ‘story’ of the plan-making / SA process, and also present measures decided concerning monitoring. **Table 4.1** serves to demonstrate that this report presents the required information.

² Environmental Assessment of Plans and Programmes Regulations 2004

³ Town and Country Planning (Local Planning) (England) Regulations 2012

Regulatory checklist

The SA Statement must...	How has this Statement presented the required information?
Summarise how environmental (and wider sustainability) considerations have been integrated into the plan	<p>This Statement has sought to provide examples of key sustainability considerations that have been highlighted through appraisal and consultation and, in turn, integrated into the plan.</p> <p>First and foremost, the relative merits of reasonable alternatives were appraised in terms of a range of sustainability issues/objectives, with a view to informing decision-making.</p>
Summarise how the SA Report and consultation responses received, as part of the Draft Plan / SA Report consultation, have been taken into account when finalising the plan.	<p>This statement seeks to explain a step-wise process over time. It was naturally the case, at each step in the process, that account was taken of earlier consultation responses, alongside wider evidence. This report has sought to provide examples to demonstrate that this was the case.</p> <p>More generally, AECOM worked closely with officers following all three of the consultations held between 2017 and 2020, to set out a clear response to those consultation responses referencing SA, or reasonable alternatives. The Consultation Statement (submission document CD/SUB/011) deals with responses to representations received at the Regulation 19 publication stage, whilst the Council's responses to the two consultations on Proposed Modifications are set out in documents ED261, ED262, ED263, ED266 and ED267. Additionally, document ED264, which was prepared by AECOM, sought to give particular attention to proposed allocation MMO006, to reflect concerns raised through the consultation.</p>
Summarise the reasons for choosing the plan as adopted, in the light of reasonable alternatives.	<p>Reasonable alternatives were appraised at three key points in the process in order to inform decision-making ahead of consultation. In each instance officers provided a response to the appraisal, amounting to their reasons for supporting the preferred option.</p> <p>The Inspector's Report also sets out reasons in support of his conclusion on plan soundness, referencing reasonable alternatives.</p>
Summarise the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan	See Section 3

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