

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

Environmental Report

July 2023

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Non-technical summary

AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging Shenley Park Supplementary Planning Document (SPD).

Shenley Park, near Whaddon, is one of the allocated sites for growth within the former district of Aylesbury Vale, located at the edge of Milton Keynes. This site, together with other allocations within the adopted Vale of Aylesbury Local Plan 2011-2031 (VALP, adopted 2021), is required to fulfil the level of growth for Aylesbury Vale as set out in VALP Policy S2 Spatial Strategy for Growth.

The aim of the SPD is to build upon the statutory development plan (VALP and other SPDs), expanding upon the VALP site allocation policy (WHA001), with a view to guiding work at the planning application / development management stage and ultimately ensuring sustainable development. The scale of the site (99ha) and allocation (at least 1,150 homes) is such that an SPD is warranted. However, it is important to be clear that <u>SPDs cannot change or add new policy</u> (see <u>guidance</u>).

SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to minimising negative effects and maximising positive effects. Central to the SEA process is publication of an Environmental Report for consultation alongside the Draft Plan that essentially presents an assessment of "the plan and reasonable alternatives".

This Environmental Report / NTS

At the current time the Draft Shenley Park SPD is published for consultation and the Environmental Report is published alongside, in order to inform the consultation. This is the Non-Technical Summary (NTS) of the Environmental Report.

Both the Environmental Report and this NTS sets out to answer three questions:

- 1) What has plan-making / SEA involved up to this point?
 - including in relation to 'reasonable alternatives'.
- 2) What are the SEA findings at this stage?
 - i.e. in relation to the Draft Plan.
- 3) What happens **next**

Firstly, there is a need to set the scene by answering: What's the scope of the SEA?

What is the scope of the SEA?

The scope of the SEA is reflected in a list of topics and objectives, which, taken together indicate the parameters of the SEA and provide a methodological 'framework' for assessment. The following topics form the core of the framework:

- Biodiversity
- Climate change
- Communities, health and wellbeing
- Historic environment

- Landscape
- Land and water resources
- Transport

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Plan making/SEA up to this point

An important element of the required SEA process involves assessing **reasonable alternatives** in time to inform development of the Draft Plan, and then publishing assessment findings in the Environmental Report to be benefit of consultees. As such, Part 1 of this report explains how work was undertaken to develop and assess a 'reasonable' range of **concept masterplan alternatives**.

Work on concept masterplan alternatives has been undertaken over a period around one year and has involved extensive engagement with stakeholder organisations as well as a range of technical evidence gathering workstreams. The 'design evolution' is explained in detail within a report available at the current time entitled *Shenley Park SPD Baseline Evidence and Design Analysis* (DLA, June 2023).

The report considers a wide range of issues and options before concluding that the key choice, at the current time, is in respect of "access + movement" – see **Figure A**. For other masterplanning issues the report concludes that there is a clear preferred approach at the current time (i.e. for consultation), in light of the available evidence.

However, for the purposes of this Environmental Report, it is considered appropriate to 'take a step back' and consider more high-level concept masterplan alternatives – see **Figure B**. Whilst there is a clear argument in support of Option 1, which forms the basis for DLA 'access + movement' scenarios', on balance it is considered reasonable to explore the four concept masterplan alternatives in detail here.

The reasonable concept masterplan alternatives are defined with a view to enabling particular consideration of / discussion around the following key issues:

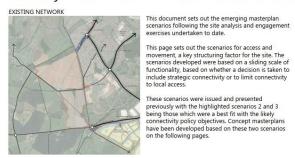
- Archaeology extensive work has been undertaken to consider a key archaeological constraint affecting the central-eastern part of the site, namely evidence of a Roman settlement. This culminated in a Cultural Heritage Impact Assessment (CHIA, Oxford Archaeology, 2023) which confirmed that the settlement is of local significance and, in turn, recommended that it does not necessitate preservation in situ (i.e. it can be excavated, recorded etc). However, in order to further bolster the evidence-base behind this approach, it is considered necessary to test the option of avoiding development over the archaeological site.
- Southern half of the site Shenley Park is "a site of two halves", with fewer constraints to development in the northern half (a plateau) relative to the southern half (a valley). There are clear arguments in favour of at least some development in the southern half, including mindful of the road connectivity, with the VALP policy requiring a new link road passing from the A421 (at the southern edge of the site) northeast through the site to join the MK grid road network (H6 and/or H7); however, there is also feasibly the option of nil growth. The assumed implication is a need for commensurately higher growth in the north (see below).
- **Green infrastructure** numerous elements of the green infrastructure strategy are now very well established (or even a 'given'); however, a key matter potentially remaining open to consideration is in respect of the size of the landscape / greenspace buffer between the site and the historic hilltop village of Whaddon.

Finally, all options are assumed to deliver at least **1,150 homes** in line with VALP Policy WHA001, and mindful of the importance of delivering on the committed VALP land supply. Further context is that the site promoter submitted an EIA Scoping Report for up to 1,650 home scheme in 2022, although the latest developer proposal is for a 1,265 home scheme (see shenleypark.consultationonline.co.uk).

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Figure A: Tightly bounded concept masterplan alternatives varying only in respect of approach to 'access and movement', as defined within the DLA Study (June 2023)

Shenley Park - Access + Movement Scenarios



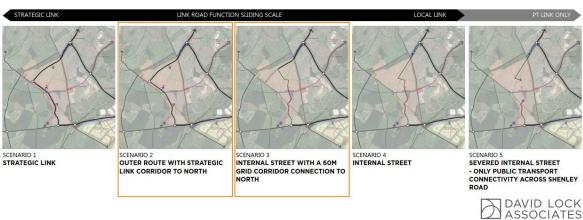


Figure B: The high-level concept masterplan 'reasonable alternatives'



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Table A presents an assessment of the high-level concept masterplan alternatives introduced above (Figure B). Presented subsequently is Buckinghamshire Council's response to the assessment / explanation of the preferred approach.

With regards to assessment methodology:

Within each row (i.e. for each of the topics that comprise the SEA framework) the columns to the right hand firstly rank the alternatives in order of preference and then, secondly, highlight instances of a predicted significant positive effects (green), moderate or uncertain positive effects (light green), moderate or uncertain negative effects (amber) and significant negative effects (red) significant effect on the baseline (mindful of established objectives). Also, '=' is used where it is not possible to confidently differentiate between the alternatives.

Table A: Reasonable alternatives assessment findings

	Option 1 Emerging preferred option	Option 2 Archaeology in situ	Option 3 Avoid the south	Option 4 Whaddon buffer	
Topic	Rank (number) and significant effects (shading)				
Biodiversity	2	3	1	3	
Climate change	71	2	2	2	
Communities	1	2	2	1	
Historic env	=	=	=	=	
Landscape	2	3	1	3	
Land and water	=	=	=	=,	
Transport	1	2	2	2	

Discussion

The assessment shows a mixed picture, with each option associated with a degree of relative merit. Option 1 performs well in a number of respects; however, it is important to be clear that it is not for SEA to arrive at an overall conclusion on which of the options is 'best'. That is because SEA is undertaken without any assumptions made in respect of the degree of importance, or 'weight', that should be assigned to each of the topics that make up the SEA framework. It is for the plan-maker to assign weight and *then* decide which option is preferred *on balance*.

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Having made these initial points, the following bullets consider each topic in turn:

• **Biodiversity** – the key consideration here is Whaddon Chase, which is a collection of woodlands associated with a former royal hunting forest. Key components of Whaddon Chase surround the southern part of the site. Also, within the southern part of the site is the Tattenhoe Brook corridor along with several linked areas of woodland that likely contribute to ecological functioning within the Whaddon Chase landscape (a <u>Biodiversity Opportunity Area</u>).

On the face of things, the Whaddon Chase constraint / opportunity might serve to indicate a preference for **Option 3**, which would avoid development in the sensitive southern part of the site. However, under this scenario there would still need to be a road corridor through the southern parcel, and the landowner might well still continue to promote the southern parcel for development, as opposed to making the land available for green infrastructure in perpetuity.

With regards to **Options 2 and 4**, there is limited biodiversity argument for a new area of parkland over the archaeological site (Option 2) or larger landscape gap to Whaddon (Option 4) at the expense of increased housing delivery in the southwest of the site, including in proximity to Whaddon Chase woodlands.

In **conclusion**, it is fair to highlight Option 3 as having a degree of merit in theory; however, in practice, and with a long-term perspective, this is less clear. Option 1 also performs well given that this approach to broad layout within the site has formed the basis for recent work to consider link road options (see Figure A above, also discussion below) as part of a wider effort to ensure that the SPD is suitably 'future-proofed', including mindful of long-term strategic planning for Whaddon Chase, including the possibility of woodland creation (see Appendix 9 of the DLA Evidence Study, also Section 9 of the main report).

• Climate change – beginning with the matter of climate change adaptation / resilience, flood risk is typically a primary consideration, and this is the case for Shenley Park, where a small brook passes through the southern half of the site. There might be a theoretical argument in support of Option 3, with a view to extensively buffering the river corridor; however, in practice, and with a long-term perspective, it is not clear that this is the case, for the reasons discussed above, under 'Biodiversity. The assumption under all of the alternatives is that the brook would be integrated within an extended Tattenhoe Valley Park.

Moving onto **climate change mitigation** / decarbonisation, the primary consideration is minimising per capita greenhouse gas emissions from **transport**, which primarily means minimising the need to travel and supporting a modal shift away from the private car towards public and active transport.

In this respect, key considerations are: A) all options can deliver a new public transport route through H7 (with a link to the local centre); B) Option 2 would not align well with a desire to make best use of Shenley Road as an active travel route, nor weight growth in proximity to the MK-edge (particularly the nearby Westcroft District Centre); and C) Option 1 has formed the basis for detailed work to consider link road options (as discussed above), including work around future-proofing for a possible Mass Rapid Transit system for MK and/or a Park and Ride to the SW of the City (potentially west of the Bottledump roundabout).

Finally, with regards to the objective of minimising per capita greenhouse gas emissions from the **built environment**, the scale of Shenley Park gives rise to a theoretical opportunity, as does the potential to support fairly high-density development and a mix of uses in the northern half of the site (i.e. housing alongside a community centre). Specifically, there could be an opportunity in respect of achieving a standard of regulated operational emissions that exceeds the requirements of Building Regulations, and feasibly even achievement of net zero emissions (ideally without offsetting, i.e. 'onsite net zero'). Also, there might be an opportunity in respect of non-operational emissions, which are unregulated, e.g. embodied carbon in building materials.

In this light, a consideration is whether any of the alternatives would necessitate a higher density local centre / higher density scheme in the northern half of the site; however, it is not clear that this is a significant consideration.

Another consideration is development viability, with a need to ensure that funding is available for decarbonisation / net zero focused measures. There is a viability argument for supporting growth across the site (Option 1), including within the southern area where new homes would need to be lower density (reflecting the sensitivities) and hence would have strong viability credentials. Furthermore, in the absence of support for new homes in the southern part of the site there could well continue to be pressure for growth here in the future, leading to a risk of 'piecemeal' growth with opportunities missed for securing developer contributions and investment in zero carbon focused measures.

In **conclusion**, Option 1 is supported from a perspective of both transport and built environment decarbonisation and does not give rise to any significant concerns from an adaptation perspective. Under Option 1 the effect of the SPD would certainly be to secure an improvement on the baseline, but it is not clear that this benefit would be 'significant' in the context of a climate emergency.

• Communities, health and wellbeing – focusing on Option 4, this would see a much larger landscape gap to Whaddon, which is a historic and by all accounts thriving village community. However, there is a clear argument for a buffer that is 'the right size' in terms of both ensuring separation and enabling good integration between the communities either side. In this light, there is thought to be a widespread understanding that, whilst the Whaddon buffer must be of a good size, what is of equal or similar importance is that it is of a high quality, including via investment in landscaping and measures to support active use.

Also, under Option 4 the effect would also be that a major emphasis of open space delivery within the site would be at the northwest extent, with a very strong concentration in this one area, potentially at the expense of open space elsewhere within the site (in terms of land availability and potentially also investment), including locations accessible from the existing MK edge. In this respect **Option 2** potentially has a degree of merit, as there would be a new strategic open space adjacent to the current MK edge. However, in practice, it is not clear that there is a particular need for this (albeit it could be high quality including with measures around archaeological interpretation). The primary green infrastructure opportunity is around the Tatternhoe Valley Park extension.

Finally, under Option 4, there is a need to consider possible issues around road and public transport connectivity, including from a future-proofing perspective, and mindful of the importance of avoiding problematic levels of traffic through Shenley Park (with resulting 'communities' impacts).

In **conclusion**, it is fair to highlight theoretical support for Option 4, mindful of the views of Whaddon Parish Council around ensuring a good-sized landscape buffer. However, it is important to recognise potential drawbacks / challenges.

• **Historic environment** – as discussed, the archaeological constraint affecting the central eastern part of the site (a Roman settlement, associated with the Shenley Road, which was a minor Roman road) was a key focus of discussion and technical work over the period 2022 to 2023. This culminated in a CHIA (2023) recommending that it is not necessary to preserve the site in situ, as it is of only local significance. Also, there is a need to consider the benefits of excavation (in terms of research etc), and also an understanding that the remains could be at risk of damage under a baseline scenario involving continued agricultural use of the land. In this light, it would not be appropriate to conclude a preference for **Option 2**, mindful of knock on implications for planning within the other land parcels within Shenley Park as well as, feasibly, implications for futureproofing, terms of strategic planning for the Whaddon area, Bottlehouse Farm (locally significant) and the Whaddon Chase landscape.

In **conclusion**, it is not possible to differentiate between the alternatives with any certainty. With regards to significant effects, neutral effects are predicted; however, there is an argument for predicting positive effects on the baseline, which is a 'no SPD' scenario. There is an urgent need for the SPD to be in place so that it can inform and guide the forthcoming planning application.

• Landscape – there is a clear theoretical argument in support of Option 3. However, in practice, and with a long-term perspective, this theoretical argument can be questioned, as has been discussed. It is crucially important that the SPD supports comprehensive and future-proofed growth, as opposed to risking piecemeal growth, which might even be described as 'sprawl'. It is hard to imagine the southern part of Shenley Park being left undeveloped in the long term and, in this light, there is a need to ensure a strategic approach is taken to sympathetic development, potentially to include strategic infrastructure, within what is a sensitive landscape including Tattenhoe Brook and Whaddon Chase.

Under **Option 1** there would be the potential for lower density and high-quality housing growth in the southern part of the site. For example, the DLA Report (2023) discusses "opportunities for development running along, not across, the contours, using the south facing slopes and the linear park as key design influences, resulting in more varied and bespoke design responses…"

In **conclusion**, it is fair to highlight theoretical support for Option 3; however, in practice, there is an argument to suggest that Option 1 could be preferable. With regards to significant effects, there is a need to recall that there are no nationally designated landscapes in the area, albeit there is a case for 'larger-than-local' significance in the context of committed and possible further strategic growth elsewhere to the south / southwest of MK.

• Land and water – the majority of the site has been surveyed in detail and found to comprise land that is not of 'best and most versatile' (BMV) quality, as defined by the NPPF. Specifically, the land is of Grade 3b quality, whilst the NPPF defines BMV as land that is of Grade 1, 2 or 3a quality. In this light, there is limited argument for leaving the southern part of the site undeveloped and in continued use of agriculture, given that the effect could be to increase pressure for growth at locations elsewhere associated with higher quality land. There are some parts of the MK-edge known to be associated with Grade 2 quality land.

With regards to water, the only matter for consideration (recalling the scope of the SPD) is water quality within the brook that bisects the southern part of the site. However, there is no reason to suggest a particular concern, or any particular opportunity, under any of the reasonable alternatives. It is fair to assume high quality Sustainable Drainage Systems (SuDS) under all scenarios.

In **conclusion**, the alternatives perform on a par with neutral effects predicted.

• Transport – this is a key issue, and one that has already been explored above. Detailed work has been undertaken to explore options for road connectivity (see Figure A), with this work assuming a broad approach in line with Option 1. This preferred approach involves an inner 'street', but also land reserved for a new strategic link / grid road. A final decision on the most appropriate approach will need to be made in light of future transport modelling. Also, there may be a need to account for proposals in the early stages of development for a Mass Rapid Transit system for MK and/or the potential for a Park and Ride to the SW of the City (which may be sited to the west of the Bottledump roundabout).

It is difficult to conclude with certainty that options other than Option 1 would conflict with strategic transport objectives, including from a future-proofing perspective. However, issues could arise, for example under: Option 4, including due to pressure for housing growth at the southwest extent of the site; and Option 3, where there would be a need for a new road link – strategic or otherwise – through the southern parcel without housing growth alongside.

Aside from the configuration of road / public transport links within the site and the wider area, the other key consideration is active travel links to key destinations including Westcroft District Centre, Salden Chase (where there is an approved reserve site for a new secondary school) and Central MK. Matters have already been discussed above, under the 'Climate change' heading.

In **conclusion**, Option 1 preferred and differential effects are judged to be of some significance, albeit there is uncertainty ahead of further work. There is a need to recall the baseline ('no SPD') situation, which could involve pressure for higher growth within the site without suitably strategic infrastructure planning.

The Shenley Park team at Buckinghamshire Council responded to the assessment as follows (N.B. the following text does not comprise an assessment):

"Option 1 is supported on balance, in light of the assessment. It performs well in a number of respects, although it is recognised that the assessment serves to highlight certain arguments for an alternative approach.

Option 1 best balances the objectives while supporting a policy compliant scheme. It seeks to ensure sufficient land is within the developable area of the site to deliver at least 1,150 homes and the other policy requirements of the site. It supports a landscape led approach with a clear western edge defensible boundary, recognises and responds to the 'on the ground' constraints of the site, including the more sensitive and topographically complex southern half, the archaeological remains, the trees and hedges and the existing communities.

Development on the southern part of the site allows the site to deliver on its policy objectives including the provision of a link road. Furthermore, the CHIA indicates that development is possible on the parcel containing the Roman settlement. The evidence shows that a larger buffer between Whaddon and Shenley Park is not

necessary to provide appropriate separation, furthermore a larger buffer here would make the new facilities at Shenley Park less accessible to the residents of Whaddon and would put pressure on the more sensitive southern part of the site to accommodate more development."

Assessment findings at this stage

Part 2 of this report presents an assessment of the Draft SPD as a whole. In practice the assessment builds upon the assessment of Option 1 presented above.

Assessment findings are presented as a series of narratives under the SEA framework. The assessment concludes:

- Moderate or uncertain positive effects in respect of 'Transport'. There is an
 argument for predicting 'significant' positive effects, but there remains some
 uncertainty regarding implications of the SPD for strategic transport objectives for
 the A421 corridor / southwest MK area. Further transport modelling work and
 A421-related evidence is required ahead of a decision on a new link road.
- Moderate or uncertain positive under the 'Communities, health and wellbeing' heading. There is a carefully considered approach to creating a high-quality new community, ensuring good access to key services and facilities as well as green infrastructure, and careful consideration is also being given to the existing community at Whaddon. There remains a degree of uncertainty around the communities implications of a potential future strategic outer link / grid road, but the SPD has sought to accommodate these considerations as far as possible. Transport modelling that will support the planning application will inform a decision on the road requirements.
- Broadly neutral effects are predicted under other headings, as per the conclusion reached for concept masterplan Option 1. As is inevitably the case, there are a range of tensions with sustainability objectives, but there is a need to recall that the baseline situation is one whereby a planning application will be forthcoming in the absence of an SPD. On the matter of climate change mitigation, it is noted that a number of similar SPDs nationally require net zero development; however, in the Shenley Park context it is not clear that there is potential to set this requirement, recalling that SPDs cannot change or introduce policy.

Next steps

This Environmental Report is published for consultation Draft SPD. Subsequent to the consultation the intention is to finalise the SPD in light of consultation responses received. The next step will then be to formally adopt the SPD.

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1. Introduction

Background

1.1 AECOM is leading on Strategic Environmental Assessment (SEA) in support of the emerging Shenley Park Supplementary Planning Document (SPD).

- 1.2 Shenley Park, near Whaddon, is one of the allocated sites for growth within the former district of Aylesbury Vale, located at the edge of Milton Keynes. This site together with other allocations within the adopted Vale of Aylesbury Local Plan 2011-2031 (VALP, 2021) is required to fulfil the level of growth for Aylesbury Vale as set out in VALP Policy S2 Spatial Strategy for Growth. The aim of the SPD is to build upon the statutory development plan (VALP and other SPDs), expanding upon the VALP site allocation policy (WHA001), with a view to guiding work at the planning application stage and ultimately ensuring sustainable development. The scale of the site (99ha) and allocation (at least 1,150 homes) is such that an SPD is warranted. However, it is important to be clear that SPDs cannot change or add new policy (see guidance).
- 1.3 SEA is a process for exploring the likely effects of a draft plan and alternatives with a view to minimising negative effects and maximising the positives.¹

SEA explained

- 1.4 It is a requirement that the SEA process is undertaken in-line with the Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.5 In-line with the Regulations, a report (known as the Environmental Report) must be published for consultation alongside the draft plan that assesses "the plan, and reasonable alternatives".² The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 1.6 More specifically, the report must answer the following three questions:
 - 1. What has plan-making / SEA involved up to this point?
 - including in relation to 'reasonable alternatives'.
 - 2. What are the SEA findings at this stage?
 - i.e. in relation to the draft plan.
 - 3. What happens <u>next</u>?

This Environmental Report

- 1.7 This report is the Environmental Report for the Shenley Park SPD. It is published for consultation alongside the Draft SPD.
- 1.8 This report answers each of the three questions introduced above in turn.³ Each question is answered within a discrete 'part' of the report.
- 1.9 Before answering question 1, there are two further introductory sections.

¹ SEA is not an automatic requirement for SPDS (unlike Local Plans). Rather, SPDs must be 'screened' to determined whether or not SEA is required. In the case of the Shenley Park SPD screening led to a conclusion that SEA is required.

² Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004.

³ See **Appendix** A for further explanation of the report structure including its regulatory basis.

2. What is the SPD seeking to achieve?

Overview

- 2.1 Once adopted, the SPD will set out a clear framework and principles of what is expected from the development at the site-wide level, with flexibility to ensure detailed approaches are established through the planning application process.
 - N.B. with regards to the planning application process, an outline application is expected soon; see shenleypark.consultationonline.co.uk/the-site/next-steps.
- 2.2 More specifically, the SPD will identify in-principle support for a specific spatial disposition of land uses and infrastructure within the site that accords with VALP policy WHA001 along with a series of overarching design parameters to ensure a high quality, distinctive, sustainable, and well-integrated development.
- 2.3 In short, whilst the Council's overarching vision and objective for the site is signposted in Policy WHA001, the purpose of the SPD is to translate that high level objective into a site specific and spatial vision and design concept.
- 2.4 The vision for Shenley Park set out in the VALP involves "... an exemplar development, of regional significance, which will be a great place to live, work and grow. Built to a high sustainable design and construction standards, the development will provide a balanced mix of facilities to ensure that it meets the needs and aspirations of new and existing residents."

The site

- 2.5 The site red line boundary can be seen in Figure 2.1, which also shows the Buckinghamshire / Milton Keynes (MK) boundary. The MK urban area is readily apparent, alongside the village of Whaddon to the west of the site. Adjacent to the south is the A421, a key artery that connects MK to the M40 corridor and other key locations to the west, with the Bottledump roundabout located at the southeast corner of the site. Shenley Road bisects the site and currently provides access between Whaddon and Milton Keynes, although the firm proposal is to downgrade the road to avoid traffic through Whaddon.
- 2.6 It is important to note that the MK urban area provides a wide variety of services, onward connections and amenities, with Central MK lying around 6.5km to the northeast, Bletchley Town Centre around 5.5km to the east and Westcroft District Centre around 1.5km to the northeast. Also, to the southeast of the site is a committed 1,855 home scheme called Salden Chase, which is set to deliver a new secondary school as well as employment land. Furthermore, Tattenhoe Park adjacent to the east of the site is under construction for 1,310 homes along with a range of community facilities. Figure 2.2 shows the location of these two committed schemes.

Supplementary information

2.7 A Baseline Evidence and Design Analysis Report (DLA, 2023) has been prepared to underpin the preparation of the SPD. It sets out key issues and opportunities, summarises the outcomes of engagement and technical work undertaken to date, details the key masterplanning and design considerations and presents the rationale for the preferred approach.

Figure 2.1: The site red line boundary, also showing woodlands in the area

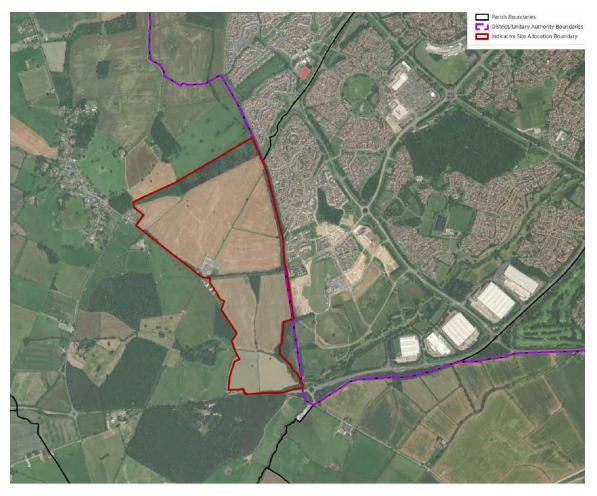
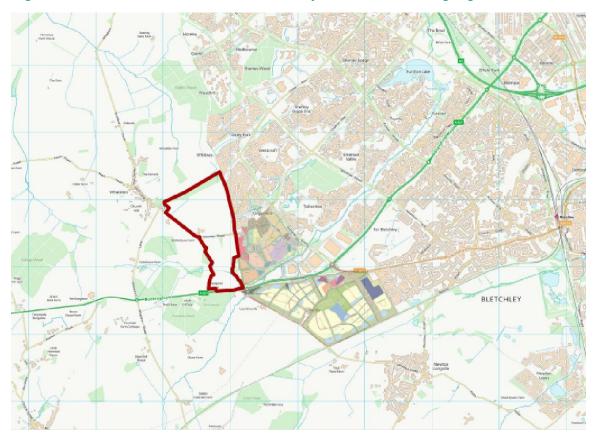


Figure 2.2: The site in the context of nearby committed strategic growth locations



3. What is the scope of the SEA?

Introduction

3.1 The aim here is to introduce the reader to the broad scope of the SEA, i.e. the sustainability topics and objectives that should be a focus of the assessment of the plan and reasonable alternatives. Appendix B presents further information.

Consultation

3.2 The requirement is that "when deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies". As such, the Environment Agency, Historic England, and Natural England were consulted in early 2023.

The SEA framework

3.3 Through the scoping process an SEA framework was established. Its purpose is to structure the appraisal of the plan and reasonable alternatives.

Table 3.1: The SEA framework

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

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

4. Introduction (to Part 1)

Overview

4.1 Work on the SPD has been underway since 2022, with a range of key milestones along the way, including engagement events with stakeholders.

- 4.2 This is important context; however, the aim here is not to provide a comprehensive explanation, or audit trail, of work to date. Rather, the aim is to explain work undertaken to develop and appraise **reasonable alternatives** in early 2023 ahead of finalising the Draft SPD for consultation.
- 4.3 More specifically, this part of the report presents information on the consideration given to reasonable alternative approaches to addressing a particular issue that is of central importance to the SDP, namely the distribution of housing, infrastructure and other land uses within the site. The decision was taken to refer to 'concept masterplan alternatives'.

Why focus on concept masterplan alternatives?

- 4.4 The decision was taken to focus on concept masterplan alternatives in light of the legal requirement, which is to define reasonable alternatives "taking into account the objectives and geographical scope of the plan."
- 4.5 Also, the decision was taken due to the likelihood of being able to differentiate between the merits of concept masterplan alternatives in respect of 'significant effects', mindful of the Government's Planning Practice Guidance (PPG), which is clear that SEA should focus only on significant effects.
- 4.6 Finally, whilst the SPD must deal with a wide range of detailed matters, there is known to be particular interest amongst stakeholder groups regarding the approach taken to distributing growth, infrastructure and other land uses within the site, i.e. concept masterplan alternatives.

Who's responsibility?

- 4.7 It is important to be clear that:
 - **Defining alternatives** is ultimately the responsibility of the plan-maker, although the SEA consultant (AECOM) is well placed to advise.
 - Assessing alternatives is the responsibility of the SEA consultant.
 - Deciding a preferred option is the responsibility of the plan-maker.

Structure of this part of the report

- 4.8 This part of the report is structured as follows:
 - Chapter 5 explains the process of defining alternatives.
 - **Chapter 6** presents the outcomes of assessing alternatives.
 - Chapter 7 explains reasons for supporting the preferred option.

5. Defining reasonable alternatives

Background

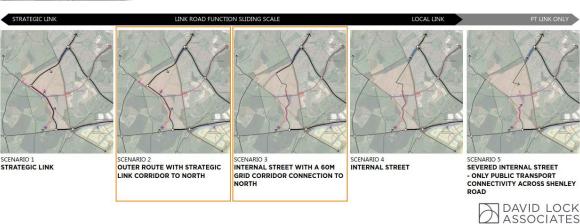
5.1 Work on concept masterplan alternatives has been undertaken over a period around one year and has involved extensive engagement with stakeholder organisations as well as a range of technical evidence gathering workstreams.

- The 'design evolution' is explained in detail within the *Baseline Evidence and Design Analysis* (DLA, June 2023), which considers a wide range of issues and options before concluding that the key choice, at the current time, is in respect of "access + movement" see **Figure A**. In particular, the key choice is judged to be in respect of the required link road through the site. More specifically, the key choice is regarding whether there should be: A) an external road link that acts as a strategic link; or B) an internal link road that acts as a 'street'. With regards to (B), there is then a supplementary question in respect of whether there is additionally land reserved for a future strategic / grid road connection. The conclusion of the DLA work is that attention focuses on Scenarios 2 and 3, but that Scenario 3 is ultimately preferable.
- 5.3 For other masterplanning issues the report concludes that there is a clear preferred approach at the current time (i.e. for consultation), in light of the available evidence. However, for the purposes of the SEA process / this Environmental Report, it is considered appropriate to 'take a step back' and consider more high-level concept masterplan alternatives, as discussed.

Figure 5.1: Tightly bounded concept masterplan alternatives varying only in respect of approach to 'access and movement', as defined within the DLA Study (June 2023)

Shenley Park - Access + Movement Scenarios





Reasonable concept masterplan alternatives

5.4 The reasonable concept masterplan alternatives were defined following a stakeholder workshop held in April 2023. The decision was taken to define concept masterplan alternatives with a view to enabling particular consideration of / discussion around the following key issues:

- Archaeology extensive work has been undertaken to consider a key archaeological constraint affecting the central-eastern part of the site, namely evidence of a Roman settlement. This culminated in a Cultural Heritage Impact Assessment (CHIA, Oxford Archaeology, 2023) which confirmed that the settlement is of local significance and, in turn, recommended that it does not necessitate preservation in situ (i.e. it can be excavated, recorded etc). However, in order to further bolster the evidence-base behind this approach, it is considered necessary to test the option of avoiding development over the archaeological site.
- Southern half of the site Shenley Park is "a site of two halves", with fewer constraints to development in the northern half (a fairly uniform plateau landscape) relative to the southern half (a more varied / intricate valley landscape). There are clear arguments in favour of at least some development in the southern half, including mindful of the road connectivity, with the VALP policy requiring a new link road passing from the A421 (at the southern edge of the site) northeast through the site to join the MK grid road network (H6 and/or H7). However, there is also feasibly the option of nil growth. The assumed implication is a need for commensurately higher growth in the north, as opposed to lower growth overall (see below).
- Green infrastructure numerous elements of the green infrastructure strategy are now very well established (or even a 'given'). Notably, and as shown in Figure 5.2, it is well established that there is a need to: protect existing green infrastructure around the edge of the site and along Shenley Road; deliver a landscape / greenspace buffer to Whaddon and deliver an extension to Tattenhoe Valley Park along the valley bottom within the southern part of the site. However, a key matter potentially remaining open to consideration is in respect of the size of the landscape / greenspace buffer between the site and the historic hilltop village of Whaddon.
- 5.5 The above considerations led to the definition of **four reasonable concept masterplan alternatives**, namely:
 - 1. The emerging preferred option (the basis for the DLA scenarios)
 - 2. As per Option 1, but with the Roman settlement area left undeveloped
 - 3. As per Option 1, but with the southern part of the site left undeveloped
 - 4. As per Option 1, but with a much larger Whaddon buffer and, in turn, an additional residential parcel in the south (west of the link road).
- 5.6 Finally, with regards to growth quantum, all options are assumed to deliver at least **1,150 homes** in line with VALP Policy WHA001, and mindful of the importance of delivering on the committed VALP land supply. Further context is that the site promoter submitted an EIA Scoping Report for an up to 1,650 home scheme in 2022, although the latest developer proposal is for a 1,265 home scheme (see shenleypark.consultationonline.co.uk).

Figure 5.2: An early sketch of key masterplanning priorities / parameters

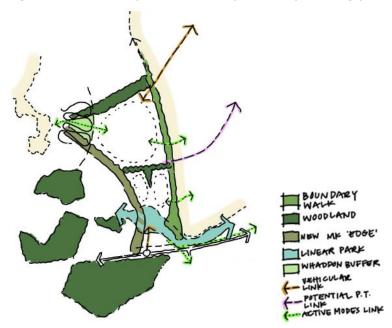
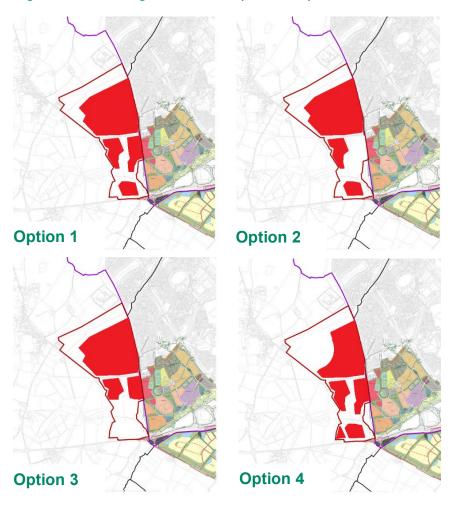


Figure 5.3: The high-level concept masterplan 'reasonable alternatives'



6. Reasonable alternatives assessment

Introduction

6.1 The aim of this section is to present assessment findings in relation to the concept masterplan reasonable alternatives introduced above.

N.B. the assessment is as per that presented in the **Non-technical Summary**.

Assessment findings

- 6.2 Table 6.1 presents the assessment.
- 6.3 With regards to assessment methodology:

Within each row (i.e. for each of the SEA framework topics) the columns to the right hand firstly rank the alternatives in order of preference and then, secondly, highlight instances of a predicted significant positive effects (green), moderate or uncertain positive effects (light green), moderate or uncertain negative effects (amber) and significant negative effects (red) significant effect on the baseline (mindful of established objectives). Also, '=' is used where it is not possible to confidently differentiate between the alternatives.

Table 6.1: Reasonable alternatives assessment findings

	Option 1 Emerging preferred option	Option 2 Archaeology in situ	Option 3 Avoid the south	Option 4 Whaddon buffer	
Topic	Rank (number) and significant effects (shading)				
Biodiversity	2	3	1	3	
Climate change	1	2	2	2	
Communities	1	2	2	1	
Historic env	=	=	=	=	
Landscape	2	3	1	3	
Land and water	=	=	=	=	
Transport		2	2	2	

Discussion

The assessment shows a mixed picture, with each option associated with a degree of relative merit. Option 1 performs well in a number of respects; however, it is important to be clear that it is not for SEA to arrive at an overall conclusion on which of the options is 'best'. That is because SEA is undertaken without any assumptions made in respect of the degree of importance, or 'weight', that should be assigned to each of the topics that make up the SEA framework. It is for the plan-maker to assign weight and *then* decide which option is preferred *on balance*.

Having made these initial points, the following bullets consider each topic in turn:

Biodiversity – the key consideration here is Whaddon Chase, which is a
collection of woodlands associated with a former royal hunting forest. Key
components of Whaddon Chase surround the southern part of the site. Also,
within the southern part of the site is the Tattenhoe Brook corridor along with
several linked areas of woodland that likely contribute to ecological functioning
within the Whaddon Chase landscape (a <u>Biodiversity Opportunity Area</u>).

On the face of things, the Whaddon Chase constraint / opportunity might serve to indicate a preference for **Option 3**, which would avoid development in the sensitive southern part of the site. However, under this scenario there would still need to be a road corridor through the southern parcel, and the landowner might well still continue to promote the southern parcel for development, as opposed to making the land available for green infrastructure in perpetuity.

With regards to **Options 2 and 4**, there is limited biodiversity argument for a new area of parkland over the archaeological site (Option 2) or larger landscape gap to Whaddon (Option 4) at the expense of increased housing delivery in the southwest of the site, including in proximity to Whaddon Chase woodlands.

In **conclusion**, it is fair to highlight Option 3 as having a degree of merit in theory; however, in practice, and with a long-term perspective, this is less clear. Option 1 also performs well given that this approach to broad layout within the site has formed the basis for recent work to consider link road options (see Figure A above, also discussion below) as part of a wider effort to ensure that the SPD is suitably 'future-proofed', including mindful of long-term strategic planning for Whaddon Chase, including the possibility of woodland creation (see Appendix 9 of the DLA Evidence Study, also Section 9 of the main report).

Climate change – beginning with the matter of climate change adaptation / resilience, flood risk is typically a primary consideration, and this is the case for Shenley Park, where a small brook passes through the southern half of the site. There might be a theoretical argument in support of Option 3, with a view to extensively buffering the river corridor; however, in practice, and with a long-term perspective, it is not clear that this is the case, for the reasons discussed above, under 'Biodiversity. The assumption under all of the alternatives is that the brook would be integrated within an extended Tattenhoe Valley Park.

Moving onto **climate change mitigation** / decarbonisation, the primary consideration is minimising per capita greenhouse gas emissions from **transport**, which primarily means minimising the need to travel and supporting a modal shift away from the private car towards public and active transport.

In this respect, key considerations are: A) all options can deliver a new public transport route through H7 (with a link to the local centre); B) Option 2 would not align well with a desire to make best use of Shenley Road as an active travel route, nor weight growth in proximity to the MK-edge (particularly the nearby Westcroft District Centre); and C) Option 1 has formed the basis for detailed work to consider link road options (as discussed above), including work around future-proofing for a possible Mass Rapid Transit system for MK and/or a Park and Ride to the SW of the City (potentially west of the Bottledump roundabout).

Finally, with regards to the objective of minimising per capita greenhouse gas emissions from the **built environment**, the scale of Shenley Park gives rise to a theoretical opportunity, as does the potential to support fairly high-density development and a mix of uses in the northern half of the site (i.e. housing alongside a community centre). Specifically, there could be an opportunity in respect of achieving a standard of regulated operational emissions that exceeds the requirements of Building Regulations, and feasibly even achievement of net zero emissions (ideally without offsetting, i.e. 'onsite net zero'). Also, there might be an opportunity in respect of non-operational emissions, which are unregulated, e.g. embodied carbon in building materials.

In this light, a consideration is whether any of the alternatives would necessitate a higher density local centre / higher density scheme in the northern half of the site; however, it is not clear that this is a significant consideration.

Another consideration is development viability, with a need to ensure that funding is available for decarbonisation / net zero focused measures. There is a viability argument for supporting growth across the site (Option 1), including within the southern area where new homes would need to be lower density (reflecting the sensitivities) and hence would have strong viability credentials. Furthermore, in the absence of support for new homes in the southern part of the site there could well continue to be pressure for growth here in the future, leading to a risk of 'piecemeal' growth with opportunities missed for securing developer contributions and investment in zero carbon focused measures.

In **conclusion**, Option 1 is supported from a perspective of both transport and built environment decarbonisation and does not give rise to any significant concerns from an adaptation perspective. Under Option 1 the effect of the SPD would certainly be to secure an improvement on the baseline, but it is not clear that this benefit would be 'significant' in the context of a climate emergency.

• Communities, health and wellbeing – focusing on Option 4, this would see a much larger landscape gap to Whaddon, which is a historic and by all accounts thriving village community. However, there is a clear argument for a buffer that is 'the right size' in terms of both ensuring separation and enabling good integration between the communities either side. In this light, there is thought to be a widespread understanding that, whilst the Whaddon buffer must be of a good size, what is of equal or similar importance is that it is of a high quality, including via investment in landscaping and measures to support active use.

Also, under Option 4 the effect would also be that a major emphasis of open space delivery within the site would be at the northwest extent, with a very strong concentration in this one area, potentially at the expense of open space elsewhere within the site (in terms of land availability and potentially also investment), including locations accessible from the existing MK edge. In this respect **Option 2** potentially has a degree of merit, as there would be a new strategic open space adjacent to the current MK edge. However, in practice, it is not clear that there is a particular need for this (albeit it could be high quality including with measures around archaeological interpretation). The primary green infrastructure opportunity is around the Tatternhoe Valley Park extension.

Finally, under Option 4, there is a need to consider possible issues around road and public transport connectivity, including from a future-proofing perspective, and mindful of the importance of avoiding problematic levels of traffic through Shenley Park (with resulting 'communities' impacts).

In **conclusion**, it is fair to highlight theoretical support for Option 4, mindful of the views of Whaddon Parish Council around ensuring a good-sized landscape buffer. However, it is important to recognise potential drawbacks / challenges.

• **Historic environment** – as discussed, the archaeological constraint affecting the central eastern part of the site (a Roman settlement, associated with the Shenley Road, which was a minor Roman road) was a key focus of discussion and technical work over the period 2022 to 2023. This culminated in a CHIA (2023) recommending that it is not necessary to preserve the site in situ, as it is of only local significance. Also, there is a need to consider the benefits of excavation (in terms of research etc), and also an understanding that the remains could be at risk of damage under a baseline scenario involving continued agricultural use of the land. In this light, it would not be appropriate to conclude a preference for **Option 2**, mindful of knock on implications for planning within the other land parcels within Shenley Park as well as, feasibly, implications for futureproofing, terms of strategic planning for the Whaddon area, Bottlehouse Farm (locally significant) and the Whaddon Chase landscape.

In **conclusion**, it is not possible to differentiate between the alternatives with any certainty. With regards to significant effects, neutral effects are predicted; however, there is an argument for predicting positive effects on the baseline, which is a 'no SPD' scenario. There is an urgent need for the SPD to be in place so that it can inform and guide the forthcoming planning application.

• Landscape – there is a clear theoretical argument in support of Option 3. However, in practice, and with a long-term perspective, this theoretical argument can be questioned, as has been discussed. It is crucially important that the SPD supports comprehensive and future-proofed growth, as opposed to risking piecemeal growth, which might even be described as 'sprawl'. It is hard to imagine the southern part of Shenley Park being left undeveloped in the long term and, in this light, there is a need to ensure a strategic approach is taken to sympathetic development, potentially to include strategic infrastructure, within what is a sensitive landscape including Tattenhoe Brook and Whaddon Chase.

Under **Option 1** there would be the potential for lower density and high-quality housing growth in the southern part of the site. For example, the DLA Report (2023) discusses "opportunities for development running along, not across, the contours, using the south facing slopes and the linear park as key design influences, resulting in more varied and bespoke design responses…"

In **conclusion**, it is fair to highlight theoretical support for Option 3; however, in practice, there is an argument to suggest that Option 1 could be preferable. With regards to significant effects, there is a need to recall that there are no nationally designated landscapes in the area, albeit there is a case for 'larger-than-local' significance in the context of committed and possible further strategic growth elsewhere to the south / southwest of MK.

• Land and water – the majority of the site has been surveyed in detail and found to comprise land that is not of 'best and most versatile' (BMV) quality, as defined by the NPPF. Specifically, the land is of Grade 3b quality, whilst the NPPF defines BMV as land that is of Grade 1, 2 or 3a quality. In this light, there is limited argument for leaving the southern part of the site undeveloped and in continued use of agriculture, given that the effect could be to increase pressure for growth at locations elsewhere associated with higher quality land. There are some parts of the MK-edge known to be associated with Grade 2 quality land.

With regards to water, the only matter for consideration (recalling the scope of the SPD) is water quality within the brook that bisects the southern part of the site. However, there is no reason to suggest a particular concern, or any particular opportunity, under any of the reasonable alternatives. It is fair to assume high quality Sustainable Drainage Systems (SuDS) under all scenarios.

In **conclusion**, the alternatives perform on a par with neutral effects predicted.

• Transport – this is a key issue, and one that has already been explored above. Detailed work has been undertaken to explore options for road connectivity (see Figure A), with this work assuming a broad approach in line with Option 1. This preferred approach involves an inner 'street', but also land reserved for a new strategic link / grid road. A final decision on the most appropriate approach will need to be made in light of future transport modelling. Also, there may be a need to account for proposals in the early stages of development for a Mass Rapid Transit system for MK and/or the potential for a Park and Ride to the SW of the City (which may be sited to the west of the Bottledump roundabout).

It is difficult to conclude with certainty that options other than Option 1 would conflict with strategic transport objectives, including from a future-proofing perspective. However, issues could arise, for example under: Option 4, including due to pressure for housing growth at the southwest extent of the site; and Option 3, where there would be a need for a new road link – strategic or otherwise – through the southern parcel without housing growth alongside.

Aside from the configuration of road / public transport links within the site and the wider area, the other key consideration is active travel links to key destinations including Westcroft District Centre, Salden Chase (where there is an approved reserve site for a new secondary school) and Central MK. Matters have already been discussed above, under the 'Climate change' heading.

In **conclusion**, Option 1 preferred and differential effects are judged to be of some significance, albeit there is uncertainty ahead of further work. There is a need to recall the baseline ('no SPD') situation, which could involve pressure for higher growth within the site without suitably strategic infrastructure planning.

7. The preferred approach

Introduction

7.1 The aim of this section is to present the response of the plan-maker to the assessment of reasonable alternatives presented above.

Reasons for supporting Scenario 1

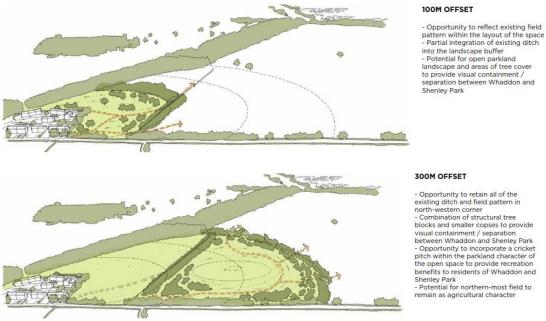
7.2 The Shenley Park team at Buckinghamshire Council responded to the assessment as follows (N.B. this does not comprise an assessment):

"Option 1 is supported on balance, in light of the assessment. It performs well in a number of respects, although it is recognised that the assessment serves to highlight certain arguments for an alternative approach.

Option 1 best balances the objectives while supporting a policy compliant scheme. It seeks to ensure sufficient land is within the developable area of the site to deliver at least 1,150 homes and the other policy requirements of the site. It supports a landscape led approach with a clear western edge defensible boundary, recognises and responds to the 'on the ground' constraints of the site, including the more sensitive and topographically complex southern half, the archaeological remains, the trees / hedges and the existing communities.

Development on the southern part of the site allows the site to deliver on its policy objectives including the provision of a link road. Furthermore, the CHIA indicates that development is possible on the parcel containing the Roman settlement. The evidence shows that a larger buffer between Whaddon and Shenley Park is not necessary to provide appropriate separation, furthermore a larger buffer here would make the new facilities at Shenley Park less accessible to the residents of Whaddon and would put pressure on the more sensitive southern part of the site to accommodate more development."

Figure 7.1: An example detailed work undertaken for one specific issue



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

8. Introduction (to Part 2)

8.1 The aim here is to present an assessment of the Draft SPD as a whole. In practice the assessment here builds upon the assessment of Option 1 above.

Assessment methodology

8.2 Under each of the SEA framework headings (see Table 3.1) the assessment identifies and evaluates 'likely significant effects' on the baseline, mindful of established objectives. Every effort is made to predict effects accurately; however, this is inherently challenging given the strategic nature of the SPD. Finally, it is important to note that effects are predicted taking account Schedule 1 of the SEA Regulations. As part of this consideration is given to cumulative effects, i.e. effects in combination with other plans, programmes and projects.

Tattenhoe Park Existing bridleway Underpass connection School / playing fields / MUGA Safeguarded 60m corridor for potential grid road extension Existing woodland / hedgerow Existing ditch / brook Local access only Local Area of Equipped Play Public transport & stops Neighbourhood Area of Equipped Play - Primary street BMX track - - Secondary street access Redways Proposed bridleway

Figure 8.1: The preferred concept masterplan (or 'framework plan')

9. Assessment of the Draft SPD

Introduction

9.1 The assessment is presented as a series of narratives under the SEA framework. Each narrative leads to a conclusion on the Draft SPD as a whole.

Biodiversity

- 9.2 The assessment of concept masterplan reasonable alternatives presented in Section 6 broadly supports the preferred option. A key matter for discussion, as part of that appraisal, is around ensuring strategic, long-term consideration is given to Whaddon Chase woodlands.
- 9.3 From Figures 9.1 and 9.2, which are taken from the Draft SPD, it can be seen that a carefully targeted approach is proposed in respect of green (and blue) infrastructure within the site. A key point to note is that the extension to Tattenhoe Valley Park will give rise to an opportunity for strategic habitat enhancement / creation, recognising that the Tattenhoe Brook, within the site, currently passes bisects a series of agricultural fields that have been under arable production in the recent past (according to historic satellite imagery).
- 9.4 Another key point to note, from the two figures below, is that 'public open space' to adjacent to the southeast of the Whaddon buffer is reserved for a potential strategic grid road, which would then pass to the south, close-by to two of the Whaddon Chase component woodlands, before joining the A421. In turn, this could potentially lead to further housing development that, in turn, supports strategic woodland creation and/or a further expansion of Tattenhoe Valley Park, beyond Shenley Park as far as the small woodland patch to the west. The new grid road would have the effect of fragmenting habitat networks in the area to some extent, but there is overall support, from a biodiversity perspective, for taking a strategic approach to managing the expansion of MK with Whaddon Chase (and the Tattenhoe Brook corridor) firmly in mind. Figure 9.3 is taken from Appendix 9 of the DLA Evidence Study, which deals with 'future proofing'.
- 9.5 Geodiversity is another consideration, but no significant issues are known.
- 9.6 In conclusion, broadly neutral effects the baseline are predicted, accounting for established objectives. It is important to recall that the baseline ('no SPD') situation could see higher growth with less strategic coordination.

Figure 9.1: The preferred approach to green infrastructure (high level)

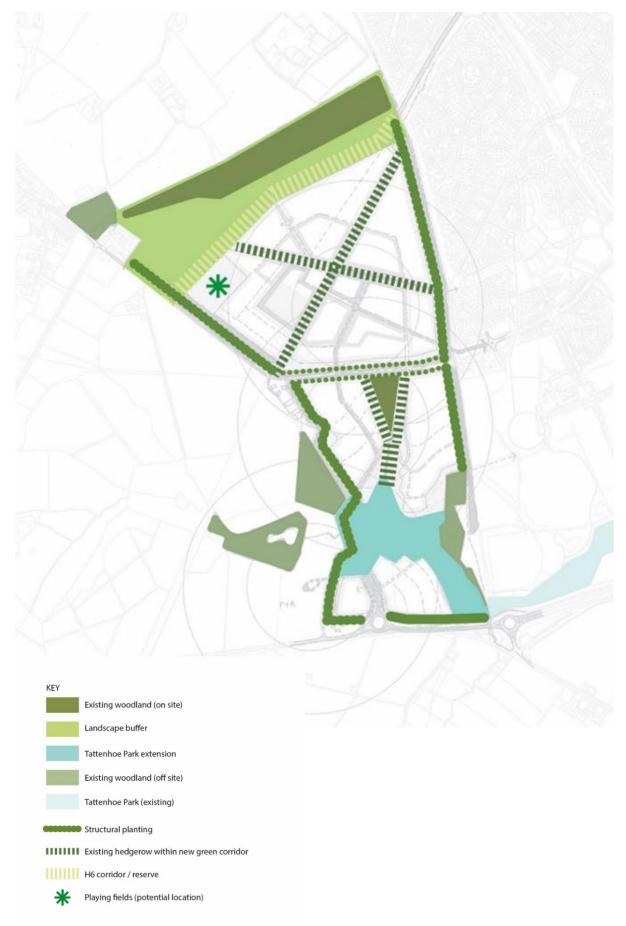


Figure 9.2: The preferred approach to green infrastructure (with added detail)

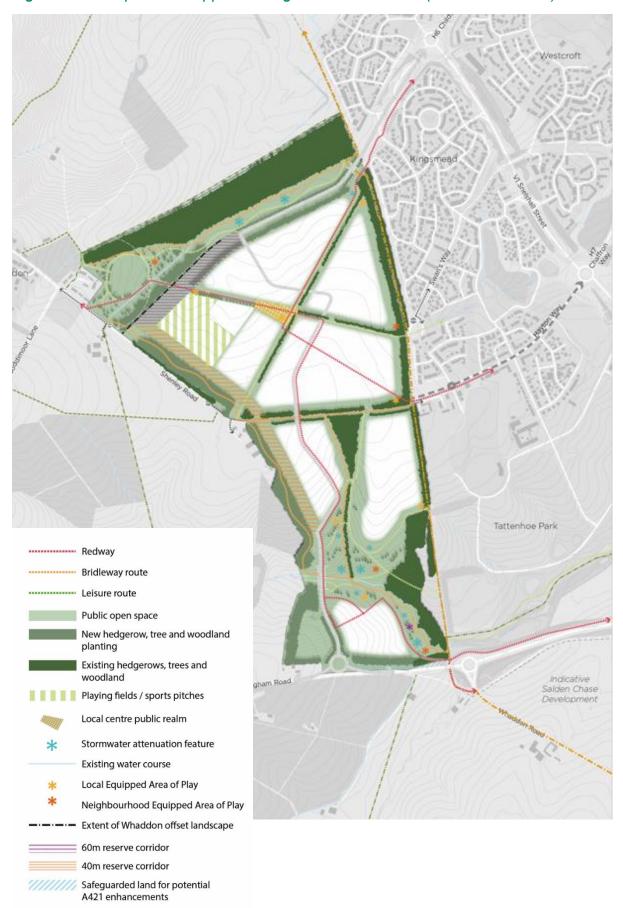


Figure 9.3: Long term future proofing considerations (DLA, 2023)



Climate change

- 9.7 The assessment of concept masterplan reasonable alternatives presented in Section 6 supports the preferred option, particularly from a perspective of seeking to minimise per capita greenhouse gas emissions from transport.
 - N.B. see further discussion under the 'Transport' heading below.
- 9.8 The assessment in Section 6 also gives consideration to built environment decarbonisation and climate change adaptation / resilience. However, it is difficult to suggest any significant issues or opportunities. It is noted that a number of similar SPDs nationally require net zero development; however, in the Shenley Park context it is not clear that there is potential to set this requirement, recalling that SPDs cannot change or introduce policy.
- 9.9 In conclusion, broadly neutral effects on the baseline are predicted, accounting for established objectives. The effect of the SPD would certainly be to secure an improvement on the baseline, but it is not clear that this benefit would be 'significant' in the context of a climate emergency.

Communities, health and wellbeing

- 9.10 The assessment of concept masterplan reasonable alternatives presented in Section 6 supports the preferred option.
- 9.11 There remains a degree of uncertainty around the communities implications of a potential future strategic outer link / grid road, but the SPD has sought to accommodate these considerations as far as possible in the absence of Transport Modelling evidence. One key point to note from Figures 9.1 and 9.2 is the proposal for a strong green infrastructure buffer along the western edge

- of the site. An outstanding question is in respect of land use the small parcel of land within the site to the west of the proposed new link road / street.
- 9.12 Aside from these high-level considerations, the Draft SPD proposes a range of detailed measures focused on the achievement of communities, health and wellbeing objectives. Beginning with the proposed vision, this states:
 - "The heart of the new community will be focused around a well-designed and human scaled local centre, with activities co-located to ensure short, linked trips can easily be made without using the car. Community facilities and services, including schools, shops and open spaces, will be provided in a timely manner alongside new homes to ensure that active travel habits within the site are established from the outset."
- 9.13 Detailed guidance is then provided on matters including:
 - Local centre for example: "The... local centre will be of a scale that
 provides sufficient goods, facilities and services to meet residents' day-today needs without creating competition with existing centres. Extensive
 walking and cycling connections extending across and through the site will
 create 'walkable neighbourhoods' meaning that the local centre will be
 easily accessed from all parts of the site, reducing the need to drive."
 - Shenley Square "... a central cluster of services around 'Shenley Square', with the potential to provide public realm with open space at its heart and a mix of uses including community facilities, foodstore/local retail and the policy-mandated care home. This will create a vibrant, local centre and annex 6 to the Baseline Report includes a series of precedent studies and best practice examples as design references for each of the components."
 - Health facility "Flexibility in the masterplanning of the local centre means that provision can be made on site for primary health care facilities if required. Further discussions with Buckinghamshire and Milton Keynes Integrated Care Boards would be required at the time of any application to confirm if this is required or the extent of off-site contribution required."
 - Densities "The use of varying intensities of development across the site could provide an increase in capacity of homes on the site and this would be appropriate in instances where densities can reinforce and support walkability within the neighbourhood and provide sufficient demand to promote sustainable travel options."
 - Whaddon "The northern neighbourhood of 'Briary Chase' will create a high quality transition between the Western Flank neighbourhoods and the village of Whaddon, enabling existing and new communities to interact harmoniously. Briary Park will create an extended parkland setting for the village of Whaddon, with homes to the south framing the new parkland..."
 - Housing mix "... will need to comply with the standards set out in VALP policies H6a/H6b (and respective supporting text)... A range of dwelling types and tenures will be provided for across the site, including a minimum of 25% affordable homes which will be 'pepper potted' across the site..."
 - Primary school "The new 2FE primary school and associated nursery, with opportunities for co-located sports pitches, are situated in an adjacent parcel to the west in close proximity to the proposed Shenley Square bus stop and with the main school building and entrance intended to be located

- where it can be easily accessible... The primary school should be open at the point in which admissions into reception year from the development reaches 15 pupils... This is estimated to be upon occupation of the 350th home or four years from the commencement of development..."
- Secondary school "It is anticipated that offsite contributions will be secured (at timing trigger points to be agreed) for secondary school provision and to provide for any further primary school capacity which cannot be accommodated by the 2FE on-site school, taking into account capacity in the primary schools in the surrounding catchment areas."
- School playing fields "... are shown provided adjacent to the school building but towards the outer edge of the northern parcel helping to retain the openness of the site towards the more sensitive countryside edges."
- MK Boundary Walk "...an underpass to be constructed west of the current Boundary Walk... ensuring priority for uninterrupted walking/cycling/riding along this important public right of way."
- 9.14 It is also important to note sections presenting detailed guidance on 'Key Spaces and Places' and 'Bespoke Design Responses'.
- 9.15 In conclusion, moderate or uncertain positive effects on the baseline are predicted, accounting for established objectives. The SPD is a key means of ensuring that the forthcoming planning application realises community, health and wellbeing objectives, albeit VALP policy also provides a good framework.

Historic environment

- 9.16 The assessment of concept masterplan reasonable alternatives presented in Section 6 broadly supports the preferred option. There is then a range of detailed guidance presented in the Draft SPD, for example:
 - Urban form "... will follow typical characteristics of nearby historic Buckinghamshire villages in the way they respond to their existing site levels and characteristics... As a general design principle, all development should seek to respond positively to and front edges where possible..."
 - Scheduled monument "Visual separation of Shenley Park from the Snelshall Priory Scheduled Ancient Monument will be maintained through the retention and enhancement of Briary Plantation Ancient Woodland and its protective buffer. The creation of a new link road connecting to H6 will be designed so as to minimise disturbance on the Ancient Woodland."
 - Roman Settlement and archaeological remains "Any excavation and recording of the Roman Settlement and other archaeological features present in and around the site will be reflected through the inclusion of interpretative boards at key locations as well as place signage. The archaeological and heritage assets within and around the site can also be used to inform the approach to and strategy for public art. Successful integration and interpretation can help instil a sense of ownership from the local community to the development and the nearby heritage assets and help create a distinctive development. This should be integrated into the layout for example as part of the play area design or local centre with consideration given to the long term management and maintenance.."

• Whaddon Hall – "Creation of an integrated and useable Whaddon buffer which is a sensitive extension to the parkland character to Whaddon Hall and which provides opportunities for informal recreation..."

- N.B. by way of background, the SPD explain: "Whaddon Hall, a Grade II Listed building, overlooking the remains of Whaddon Chase, a former medieval hunting forest is also located to the north of the site."
- Non-designated heritage assets (NDHAs) the key issue is the collection
 of buildings at Bottlehouse House Farm. If a strategic outer link road were
 required (Scenario 1 and also potentially Scenario 2 in Figure 5.1) then
 farm outbuildings would be impacted. The SPD states that "if the 'outer
 link' is to come forward on this alignment, and is sufficiently justified, a level
 3 recording of the buildings will be required."
- 9.17 In conclusion, **broadly neutral effects** on the baseline are predicted, accounting for established objectives. The effect of the SPD would certainly be to secure an improvement on the baseline, but it is not clear that this benefit would be 'significant' over-and-above the baseline situation involving a planning application coming forward under adopted VALP policy.

Landscape

- 9.18 The assessment of concept masterplan reasonable alternatives presented in Section 6 broadly supports the preferred option. The key issue is a need to take a balanced approach that recognises sensitivities to the south and also importance of a landscape buffer to Whaddon / Whaddon Park.
- 9.19 Aside from these high level considerations, the Draft SPD proposes a range of detailed measures focused on the achievement of landscape objectives.
- 9.20 Beginning with the proposed vision, it states:
 - "Taking a strong cue from its position within the wider Whaddon Chase landscape, a new community will be established at Shenley Park which blends effectively the best of 'town and country'."
- 9.21 There is then a range of detailed guidance presented in the Draft SPD, for example with a key distinction between:
 - Northern 'Plateau' Neighbourhood "... linear layout incorporating existing green infrastructure elements and orientated along lines of existing /enhanced hedgerows, with a higher density mixed use local centre at its heart, focusing public activity, community and education uses around high quality public realm / open spaces designed to foster a lively and welcoming sense of place. Development here could take its cues from more urban and contemporary styles of housing within Kingsmead and Tattenhoe Park in the west and in and around the local centre, transitioning to lower density and more rural edge typologies to the north-west..."
 - Southern 'Valley' Neighbourhood "... layout and character of buildings and public realm working with and heavily influenced by the topography. Predominantly residential, built development will run along, not across, the contours, using the south facing slopes, watercourse and the linear park as key design influences, resulting in more varied and bespoke design responses and housing styles (which could include self and custom build)"

9.22 Further detailed guidance is provided on matters including:

 Topography – "...starts with the premise that re-profiling, cut-and-fill, and engineering techniques will be minimised (if not avoided) and the Site's topography and resultant character will be preserved wherever possible to create a distinctive form of context driven development."

- Southern neighbourhood "The layout and design... will clearly reflect the existing topography with streets and development arranged accordingly, resulting in a more intimate and informal character."
- Green infrastructure buffers "Applying the landscape buffers stipulated by VALP policies NE2/NE8 to the existing on-site green / blue infrastructure hedgerows (10m); woodland (25m); ancient woodland (50m) and watercourses (10m) has been taken as a starting point..."
- Hedgerows and trees "Existing green infrastructure of woodlands, trees and hedgerows will be retained in their entirety with the exception of one hedgerow which runs perpendicular to the A421."
- Whaddon Chase Biodiversity Opportunity Area (BOA) "... design of landscape and green infrastructure will seek to protect, enhance, create and connect biodiversity to support coherent and resilient ecological networks as supported by Design Guidance."
- Whaddon Offset (Buffer) "A 'Whaddon offset' of a minimum width of 150m between the extent of build development edges is required, providing a balance between visual separation and functional integration and community connectivity. The Whaddon offset will have a parkland character, with trees and grass / wildflower meadow being the predominant features... The open space will reflect the historic parkland character which exists immediately north of Briary Plantation...
 - ... Leisure routes will be integrated into the design of the space and walking and cycling access and a connection to the MK redway network will be accommodated within this area providing connectivity between Whaddon, Shenley Park and MK. Bridleway access will be integrated providing connectivity eastwards towards the MK Boundary Walk and westwards towards Whaddon and the wider bridleway network."
- Outer Link reserve corridor "Whilst not forming part of the 'Whaddon offset' the creation of the Outer Link reserve corridor and arrangement of playing fields / sports pitches will set-back built development within Shenley Park further from the southern extent of Whaddon village, further increasing the physical and visual separation between the two settlements."
- Western defensible edge "A new defensible boundary to Milton Keynes will be created along the development's western edge using structural tree planting to be integrated with the site-wide green infrastructure.
 - ...At a site level, the western boundary of the site is already well-defined on the ground by field boundaries and Shenley Road and can be reinforced with a combination of a well-designed development edge and landscape design. Substantial areas of tree planting will be created..."
 - ... The design approach to landscape planting should reflect the 'plateau' characteristic of the northern part of the site and the 'valley' characteristic of the southern part. This will manifest in a consistent woodland block as

- edge treatment for the northern part (north of Shenley Road)... with a more flexible and organic width of woodland buffer along its length for the southern part of the site (south of Shenley Road to the A421)."
- Tattenhoe Valley Park extension "... will connect Milton Keynes to the open countryside through the site... create a high-quality public space with integrated active travel routes (including bridleways), green infrastructure and naturalistic stormwater attenuation features, replicating these elements of the design ethos for the wider... park."
 - ... Path connections will be made between the linear park and the adjacent streets and development parcels. Cross-park permeability will be provided... Lighting shall be limited to the Redways and primary paths with the linear park being generally a dark zone."
- SuDS "will be considered as an integral component of the development at all scales from individual building / plot to the attenuation basin. SuDS will be sensitively integrated across the development to provide stormwater attenuation functionality in streets (through elements such as swales) and development areas (such as formal ponds) as well as open spaces."
- 9.23 In conclusion, **broadly neutral effects** on the baseline are predicted, accounting for established objectives. A carefully considered approach is proposed for this "site of two halves" also accounting for the need to future-proof. The effect of the SPD would certainly be to secure an improvement on the baseline, but it is not clear that this benefit would be 'significant'.

Land and water

- 9.24 The assessment of concept masterplan reasonable alternatives presented in Section 6 broadly supports the preferred option, and there is little further to add here in respect of the Draft SPD as a whole. With regards to surface water drainage, the Draft SPD states:
 - "The drainage design solutions developed must respond sensitively and appropriately to the existing Site (including topography, vegetation, water bodies) to ensure the SuDS features can provide a wide range of benefits additional to the functional drainage including amenity, recreation, biodiversity and placemaking."
- 9.25 In **conclusion**, broadly neutral effects on the baseline are predicted, accounting for established objectives.

Transport

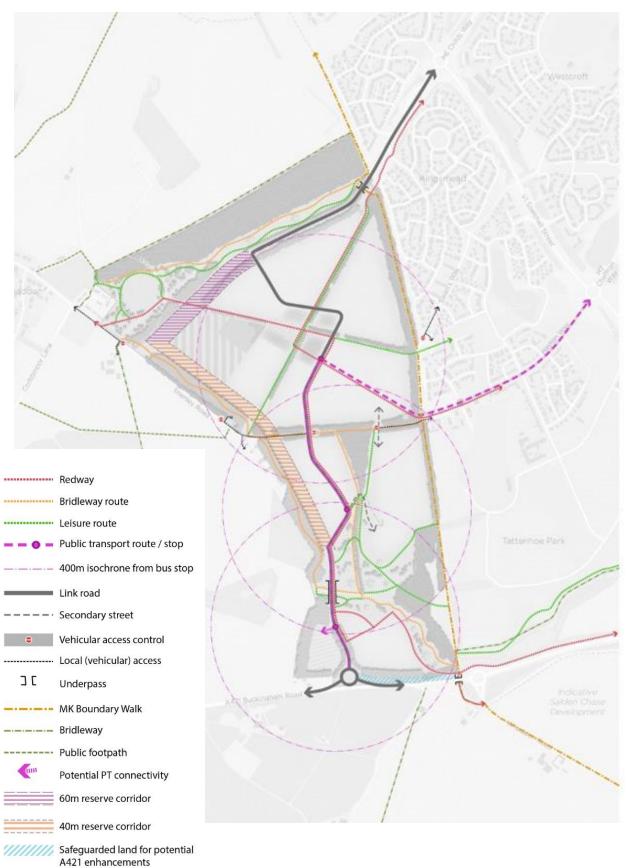
- 9.26 The assessment of concept masterplan reasonable alternatives presented in Section 6 broadly supports the preferred option (Option 1).
- 9.27 Aside from the configuration of road / public transport links within the site and the wider area, mindful of future-proofing, the other key consideration is active travel links to key destinations including Westcroft District Centre, Salden Chase (the likely location for a new secondary school) and Central MK. These are shown clearly in Figure 9.4.
- 9.28 In addition to a dedicated public transport corridor, there will be a series of Redway cycle links. Attention focuses on the southernmost community as

- being perhaps ~800 from the proposed local centre, but the community here will be well connected to Salden Chase, to the east, by a Redway.
- 9.29 On the matter of long term planning, the SPD explains: "Further, decisions on some of the strategic aspects of future connectivity and longer term function of the infrastructure network are not yet able to be made because they are at an early stage of planning or policy processes and need to be informed by more detailed transport modelling associated with a planning application as well as outputs from the strategic transport studies such as the A421 Capacity Study and development of proposals for a Mass Rapid Transit system for MK and/or the potential for a Park and Ride to the SW of the City (and which may likely be sited to the west of the Bottledump roundabout)."
- 9.30 In **conclusion**, Option 1 preferred and differential effects are judged to be of some significance, albeit there is uncertainty ahead of further work.

Conclusion on the Draft SPD

- 9.31 In conclusion, after having accounted for the baseline situation, which is one whereby a planning application would come forward in the absence of an SPD but in line with adopted VALP policy, the appraisal concludes:
 - Moderate or uncertain positive effects in respect of 'Transport'. There is an argument for predicting 'significant' positive effects, but there remains some uncertainty regarding implications of the SPD for strategic transport objectives for the A421 corridor / southwest MK area. Further transport modelling work and A421-related evidence is required ahead of a decision on a new link road.
 - Moderate or uncertain positive under the 'Communities, health and wellbeing' heading. There is a carefully considered approach to creating a high-quality new community, ensuring good access to key services and facilities as well as green infrastructure, and careful consideration is also being given to the existing community at Whaddon. There remains a degree of uncertainty around the communities implications of a potential future strategic outer link / grid road, but the SPD has sought to accommodate these considerations as far as possible. Transport modelling that will support the planning application will inform a decision on the road requirements.
 - Broadly neutral effects are predicted under other headings, as per the conclusion reached for concept masterplan Option 1. As is inevitably the case, there are a range of tensions with sustainability objectives, but there is a need to recall that the baseline situation is one whereby a planning application will be forthcoming in the absence of an SPD. On the matter of climate change mitigation, it is noted that a number of similar SPDs nationally require net zero development; however, in the Shenley Park context it is not clear that there is potential to set this requirement, recalling that SPDs cannot change or introduce policy.
- 9.32 No specific recommendations are made as part of the appraisal; however, the appraisal raises a number of issues that will need to be given further consideration prior to plan finalisation, alongside consultation responses.

Figure 9.4: Road, public travel and active travel links



Part 3: What are the next steps?

Part 3

10. Next steps

Plan finalisation

10.1 This Environmental Report is published for consultation alongside the Draft Shenley Park SPD. As discussed in Section 1, the aim of this report is to inform the consultation and subsequent plan finalisation.

- 10.2 Following the consultation the intention is for the SPD to be finalised and then adopted. It is important to note that there is no requirement for SPDs to be subject to an independent examination process prior to adoption (unlike Local Plans and Neighbourhood Plans).
- 10.3 At the time of adoption a brief SEA Statement will be published explaining the step of plan finalisation and also presenting a proposed monitoring framework.

Monitoring

10.4 The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report. The Draft SPD states the following:

"Policy S8 of the Vale of Aylesbury Local Plan sets out how the Council will monitor policies in the Vale of Aylesbury Local Plan annually through their Monitoring Report. The Council will monitor the content of and implementation of this Supplementary Planning Document in the same fashion to ensure the aims and objectives of this Supplementary Planning Document are being achieved. In the event delivery is not being achieved in accordance with the Supplementary Planning Document then it may be necessary for the Council to review the Supplementary Planning Document and propose remedial steps."

Part 3 30

Appendices

Appendix I: Legal checklist

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

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

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

Schedule 2

Interpretation of Schedule 2

The report must include...

(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;

- (b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan
- (c) the environmental characteristics of areas likely to be significantly affected;
- (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;
- (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;
- (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:
- (g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;
- (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
- (i) a description of the measures envisaged concerning monitoring.

The report must include...

An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes

i.e. answer - What's the plan seeking to achieve?

Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance

The relevant environmental

ticular i.e. answer - What's the 'context'?

The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'

protection objectives, established at

international or national level

The environmental characteristics of areas likely to be significantly affected

Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance

issues and objectives that should be

Key environmental problems /

a focus of appraisal

i.e. answer - What's the 'baseline'? What's the scope of the SA?

answer -

Φį

i.e. answer - What are the key issues & objectives?

An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach)

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. i.e. answer - What has Planmaking / SA involved up to this point?

[Part 1 of the Report]

The likely significant effects associated with the draft plan

The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan

i.e. answer - What are the assessment findings at this current stage?

[Part 2 of the Report]

A description of the measures envisaged concerning monitoring

i.e. answer - What happens next?

[Part 3 of the Report]

Table Al.3: 'Checklist' of how (throughout the SEA process) and where (within this report) regulatory requirements are met

Regulatory requirement How requirement is met A) The Environmental Report must present certain information 1. An outline of the contents, main Section 2 ('What is the plan seeking to objectives of the plan or programme, achieve') presents this information. and relationship with other relevant plans and programmes; 2. The relevant aspects of the current These matters have been considered in state of the environment and the likely detail through scoping work, which has evolution thereof without involved dedicated consultation on a implementation of the plan or Scoping Report. programme; The 'SEA framework' – the key outcome of scoping – is presented within Section The environmental characteristics of 3 ('What is the scope of the SEA?') and areas likely to be significantly affected; Appendix II discusses key issues. 4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.; The SEA framework is presented within 5. The environmental protection, objectives, established at international, Section 3. Community or national level, which are With regards to explaining relevant to the plan or programme and "how...considerations have been taken the way those objectives and any into account", Section 7 explains the environmental, considerations have plan-maker's reasons for supporting the been taken into account during its preferred approach', i.e. explains how/ preparation; why the preferred approach is justified in light of alternatives. 6. The likely significant effects on the Section 6 presents an assessment of environment, including on issues such reasonable alternatives, in the form of as biodiversity, population, human alternative concept masterplans. health, fauna, flora, soil, water, air, Section 9 presents an assessment of climatic factors, material assets, the Draft SPD. cultural heritage including architectural With regards to assessment and archaeological heritage, landscape methodology, Section 8 explains the role and the interrelationship between the of the SEA framework/scope, and the above factors. (Footnote: These effects need to consider the potential for should include secondary, cumulative, various effect characteristics/ synergistic, short, medium and longdimensions, e.g. timescale. term permanent and temporary, positive and negative effects);

Regulatory requirement	How requirement is met
7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	The assessment highlights certain tensions with environmental and wider sustainability objectives, which might potentially be actioned when finalising the plan.
8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Sections 4 and 5 deal with 'reasons for selecting the alternatives dealt with', in that there is an explanation of the reasons for focusing on particular issues and options/alternatives. Also, Section 7 explains the planmaker's reasons for selecting the preferred option (in-light of alternatives).
9. Description of measures envisaged concerning monitoring in accordance with Art. 10;	Section 11 presents measures envisaged concerning monitoring.
10. A non-technical summary of the information provided under the above headings	Presented at the start of this report.

B) The Report must be published for consultation alongside the draft plan

Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the Draft Plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)

At the current time, this report is published for consultation alongside the Draft SPD, in order to inform the consultation.

C) The report must be taken into account, alongside consultation responses, when finalising the plan

The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.

This report, and consultation responses received, will be taken into account when finalising the SPD.

Appendix II: SEA scope

The aim here is to summarise key issues / opportunities highlighted through the consultation responses on the SEA scope received by Historic England and Natural England in early 2023.

Historic England:

- Emphasised the importance of the SPD presenting: "Details of how archaeological remains of more than local importance shall be protected and how proposals will minimise harm to the setting of Snelshall Monastery Scheduled Monument."
- Supplementary assessment questions might include:
 - Are proposals likely to harm to the setting of adjacent heritage assets?
 - Are proposals likely to harm archaeological remains within the site boundary?
 - Do proposals respond positively to the location's history and heritage assets?

Natural England:

- The assessment should consider how options help to enhance designated assets/sites in line with good ecological practice, and any avoidance measures should be in line with the mitigation hierarchy (avoid, mitigate, compensate).
- Ancient woodland is a key issue. The site is fortunate to have a stand of ancient replanted woodland to the north. Ancient woodland takes hundreds of years to establish and is defined as an irreplaceable habitat.
- Multi-functional spaces and green infrastructure is key to the achievement of communities objectives; see Natural England's Green Infrastructure Framework.
- In addition to agricultural land, there is a need to consider the value of soils more widely. In order to safeguard soil resources as part of the overall sustainability of the development, it is important that the soil resource is able to retain as many of its important functions as possible. This can be achieved through careful soil management and appropriate, beneficial soil re-use, with consideration on how any adverse impacts on soils can be avoided or minimised. Defra has published a Construction Code of Practice for the Sustainable Use of Soils on Construction Sites. It provides advice on the use and protection of soil in construction projects, including the movement and management of soil resources. The British Society of Soil Science has published the Guidance Note Benefitting from Soil Management in Development and Construction which sets out measures for the protection of soils within the planning system and as part of construction.