



Wycombe District Council

**Sustainability Appraisal (SA) of the
Proposed Submission (Regulation 19) Draft of the
Wycombe District Local Plan**

Non-Technical Summary

September 2017



people place pounds
getting our priorities right

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1. Introduction

This Sustainability Appraisal (SA) has been produced by officers at Wycombe District Council; with support from AECOM who have acted both as a critical friend and who have also produced parts of the report on behalf of the Council.

SA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating adverse effects and maximising the positives. SA for Local Plans is a legal requirement, in-line with the EU Strategic Environmental Assessment (SEA) Directive.

At the current time, the 'Proposed Submission Draft' version of the Local Plan is published in-line with Regulation 19 of the Local Planning Regulations, and the 'SA Report' is published alongside. The SA Report aims to inform representations, and subsequent plan-making work (see the discussion of 'next steps', below).

This is a Non-technical Summary (NTS) of the SA Report.

1.1 Structure of the SA Report/ this NTS

SA reporting essentially involves answering the following questions in turn:

1. What has plan-making / SA involved up to this point?
 - i.e. in the run-up to preparing the Proposed Submission Draft Local Plan.
2. What are the appraisal findings at this current stage?
 - i.e. in relation to the Proposed Submission Draft Plan.
3. What are the next steps?

Each of these questions is answered in turn below. Firstly though there is a need to set the scene further by answering the questions 'What is the plan seeking to achieve?' and 'What's the scope of the SA?'

1.2 What is the plan seeking to achieve?

Wycombe District Council is preparing a new Local Plan, the Wycombe District Local Plan (WDLP), sets out policies and proposals to address the District's growth needs for the period 2013-33. The plan is being prepared under the Planning and Compulsory Purchase Act (2004, as amended) and the Town and Country Planning (Local Planning) (England) Regulations 2012, and once adopted will have the status of a Local Plan.

The new Wycombe District Local Plan will review and replace the existing Wycombe Core Strategy (adopted 2008) and remaining saved policies from the current Wycombe District Local Plan (adopted 2004). It will also address a range of detailed development management policy issues.

The only area which the WDLP will not cover is that covered by the Delivery and Site Allocations (DSA) Plan, which has a particular focus on delivering regeneration and improvement to High Wycombe District Centre as well as proposals aimed at supporting and improving Marlow and Princes Risborough town centres and some other development management policies. The DSA Plan was adopted by Wycombe District Council in July 2013. It is intended that the Wycombe District Local Plan will sit alongside the Delivery and Site Allocation Plan when adopted.

1.2.1 Plan vision and objectives

The Local Plan vision is, “Wycombe District: economically strong and the place to live work and visit.”

The eight strategic objectives are to:

1. Cherish the Chilterns

Cherish the Chilterns by conserving and enhancing the natural beauty of the landscape of the Chilterns Hills.

2. Strengthen the Sense of Place

Strengthen the sense of place throughout Wycombe District by:

- protecting and enhancing the District’s natural and built environment, including landscape, biodiversity, green and blue infrastructure, historic and cultural assets;
- maintaining place identity by using Green Belt to keep main settlements separate;
- securing high quality, bespoke responses in the design of new development.

3. Foster economic growth

Foster the economic strength of the M40/A404 location and that of the rural economy.

4. Improve strategic connectivity

Improve strategic transport connectivity within Buckinghamshire by road and rail; this includes strategic connectivity between the South East Midlands, Aylesbury, Princes Risborough, High Wycombe, London as well as the Thames Valley.

5. Facilitate local infrastructure

Facilitate timely improvements to local infrastructure by focused investment and by securing appropriate benefits from new development.

6. Deliver housing

Contribute our fair share towards tackling the need for more housing including for affordable housing and other specific housing needs of the community, including catering for a growing aging population.

7. Champion town centres

Champion thriving town and business centres to provide the focus of our social and economic activity.

8. Mitigate Climate Change

Reduce CO2 emissions by reducing the need for travel by private car, and aid public transport viability, through intensifying existing urban areas by re-use of brownfield sites, locating development in settlements with the widest range of services and facilities, and by clustering development to achieve high quality walking, cycling and public transport provision.

1.3 What's the plan not trying to achieve?

It is important to emphasise that the plan will be strategic in nature. Even the allocation of sites should be considered a strategic undertaking, i.e. a process that omits consideration of some detailed issues in the knowledge that these can be addressed further down the line (through the planning application process). The strategic nature of the plan is reflected in the scope of the SA.

1.4 What's the scope of the SA?

The scope of the SA is essentially reflected in a list of sustainability objectives. Taken together, these objectives (which are grouped under ten topic headings) indicate the parameters of SA, and provide a methodological 'framework' for appraisal.

Table 1: SA objectives and topics

SA Objective	SA Topic
1. To conserve and enhance biodiversity	Biodiversity and Geodiversity
2. To conserve and enhance the District's landscape and, in particular, those areas designated for their landscape value.	Landscape
3. To conserve and enhance the District's townscapes and historic environment, and, in particular, those areas designated for their heritage importance:	Historic Environment
4. To maintain and enhance the quality and quantity of the District's water sources, achieve sustainable water resources management and reduce the risk of flooding	Natural Resources and Climate Change
5. To reduce contributions to climate change, through (a) sustainable building practices, (b) maximising the potential for renewable energy and energy conservation and (c) promoting sustainable management of waste	Natural Resources and Climate Change
6. To improve efficiency in land use through the re-use of previously development land and existing buildings	Natural Resources
7. To deliver transport improvements, improve travel choice and connectivity, reduce the need for travel by car and reduce the negative impact of transport on the environment	Transport and Traffic
8. To ensure that existing and future residents have the opportunity to live in a decent home	Housing
9. To improve accessibility for everyone to health, education, recreational, cultural and community facilities and services	Community and Wellbeing
10. To create and sustain vibrant and sustainable communities and to ensure that new development is of a high quality design and reinforces local distinctiveness	Community and Wellbeing
11. To maintain and improve the health, well-being and community cohesion of the population and reduce social deprivation	Community and Wellbeing
12. To promote a strong, balanced and sustainable economy	Economy and Employment
13. To maintain high and stable levels of employment so that everyone can benefit from economic growth	Economy and Employment
14. To raise educational attainment and develop and maintain a skilled workforce to support long-term competitiveness	Economy and Employment
15. To retain existing businesses while having a sector focus to develop new business in the area	Economy and Employment

2. Plan-making/ SA up to this point

An important element of the required SA process involves appraising 'reasonable alternatives' in time to inform development of the draft plan, and then presenting information on reasonable alternatives within the report published alongside the draft plan.

As such, Part 1 of the SA Report explains how work was undertaken to develop and appraise alternative approaches to housing and employment growth ('alternative spatial strategies'). Specifically, Part 1 of the report:

- Explains the process of establishing reasonable alternatives;
- Presents the appraisal of the reasonable alternatives; and then
- Gives the Council's response to the alternatives appraisal findings.

2.1 Developing reasonable alternatives

Plan-making has been underway since 2012, with a wide range of evidence produced to inform the development of the draft plan. Prior to this current consultation (Local Planning Regulation 19¹), an options consultation document was published in January 2014 and draft consultation document published in June 2016. SA has been carried out iteratively alongside plan-making. Table 2 sets out the timeline for the main phases of work in the preparation of the Local Plan. It includes the phases of work, Local Plan and SA Documents published along with dates for consultation.

Table 2: Local Plan and SA stages

Phases of work and Dates	Local Plan Documents & Consultation	SA Documents & Consultation
Phase1 End 2012 - Summer 2013	Initial Reg 18 invitation for stakeholders to identify issues and community conversations on issues.	SA Scoping Report Prepared by the Council Sent to statutory consultees for comment in October 2013.
Phase 2 Feb - Apr 2014	Options Consultation Document Public consultation from Feb to Mar 2014	Initial Sustainability Appraisal Report Prepared by the Council Public consultation from Feb to Mar 2014
Phase 3a May 2014 - Jun 2016	Engagement on specific pieces of evidence work as appropriate.	None
Phase 3b Summer 2014 - Mar 2016	Princes Risborough Town Plan Public consultation from Feb to March 2016	SA of the Princes Risborough Town Plan Report Prepared by Lepus Consulting Public consultation from Mar to Apr 2016

¹ The Town and Country Planning (Local Planning) (England) Regulations 2012

Phase 4 Jun - Aug 2016	Draft Consultation Document Public consultation from Jun to Aug 2016	Draft SA Report Prepared by the Council Public consultation from 04 Aug to 22 Aug 2016
Phase 5 Sept 2016 - August 2017	Reg 19 Publication Version Public consultation from Oct to Nov 2017	Reg 19 SA Report (this report) Prepared by the Council and AECOM Public consultation from Oct to Nov 2017

Rather than recap the entire ‘story’ in detail, the intention here is to explain the work undertaken in 2016 and 2017, which led to the development of the draft plan that is currently the focus of appraisal and currently published under Local Planning Regulation 19. Specifically, in-line with regulatory requirements (Schedule 2 of the SEA Regulations), there is a need to explain how work was undertaken to develop and then appraise reasonable alternatives, and how the Council then took into account appraisal findings when finalising the draft plan for publication.

Whilst the plan objectives (see Chapter 1, above) are numerous and cover a range of issues, it is clear that an overarching objectives² relates to the identification of land to meet housing and employment needs. Determining an approach to housing and employment growth is the primary means by which the plan seeks to achieve wide ranging objectives. It is the matter at the heart of the plan. Hence it is considered reasonable³ that alternatives appraisal should focus on this matter.

Since the Draft Consultation Document was published in June 2016, the evidence base and further technical work has progressed. It was therefore recognised that further work was needed to refine understanding of spatial strategy alternatives (i.e. continue the process of refinement discussed above)⁴ and ultimately arrive at reasonable alternatives for appraisal/ consultation. The task involved giving consideration to ‘top-down’ factors and ‘bottom-up’ factors, before finally ‘pulling things together’ and establishing reasonable alternative spatial strategies.

² In line with the Environmental Assessment of Plans and Programmes Regulations (2004), a decision on what ‘reasonably’ should be the focus of alternatives appraisal should be made in-light of the plan objectives. In the case of the Wycombe Local Plan, it is suggested that plan objectives which relate to meeting objectively assessed housing and employment needs, are somewhat overarching.

³ Recent case-law (most notably Friends of the Earth Vs. Welsh Ministers, 2015) has established that planning authorities may apply discretion and planning judgement when determining what should reasonably be the focus of alternatives appraisal, recognising the need to apply a proportionate approach and ensure an SA process / report that is focused and accessible.

⁴ National Planning Practice Guidance is clear that understanding of alternatives should be ‘refined’ over time through the SA process.

2.1.1 'Top-down' considerations

Aylesbury Vale, Chiltern and Wycombe District Councils jointly commissioned Housing and Economic Development Needs Assessment (HEDNA) to identify housing and economic needs for the Housing Market Areas (HMA) and their Districts. The Buckinghamshire HEDNA was published in January 2016⁵. An updated version of the Housing and HEDNA was published in December 2016 in order to take account of new population and household projection data being released as well as consultation feedback received by all four authorities when they consulted on their Local plans in 2015 and 2016. The HEDNA was then supplemented by an addendum (September 2017), which was jointly commissioned by the Bucks Districts and the Bucks Thames Valley Local Enterprise Partnership.

The Bucks HEDNA Addendum (September 2017) identified the following objectively assessed housing need for the HMA for the Local Plan period (2013-33):

Table 3: Bucks HEDNA Housing OAN 2017

Authority/Plan area	Objectively assessed housing need (dwellings)
Aylesbury Vale (2014-33)	19,400
Chiltern and South Bucks (2014-33)	12,900 ⁶
Wycombe (2014-33)	13,200
Bucks HMA	45,500

The Bucks HEDNA (December 2016) identified the following employment OAN for Wycombe District for the Local Plan period (2013-33):

Table 4: Bucks HEDNA employment OAN 2017

	Demand (sqms)	hectares
B1a/b Office	+ 68,000	+ 14
B1c/ B2 Industrial	- 48,000	- 12
B8 Warehousing	+ 34,000	+ 7
Total	+ 54,000	+ 8

The OAN for employment in the HEDNA, which is based on the Oxford Economics projections, as set out in the table above, suggests that there is scope for further growth in office and warehousing jobs and hence floorspace, but a further decline in industrial space. (Positive figures indicate a growth whereas negative figures indicate a projected decline).

The housing and employment need figures, set out in the HEDNA, is the starting point against which an assessment of physical and environmental constraints must be made to determine whether the needs can be met or, if not, what the capacity of the District might be.

⁵ Buckinghamshire Housing and Economic Development Needs Assessment 2015 (Jan 2016). Available [online]: <https://www.wycombe.gov.uk/uploads/public/documents/2016-01-13-Buckinghamshire-HEDNA-FINAL.pdf>

⁶ Note that the Chiltern and South Bucks plan period is 2014-36 but figure shown are 2014-33 for consistency purposes in relation to the end date of the Wycombe and Aylesbury vale plan periods.

2.1.2 'Bottom-up' considerations

One of the key pieces of evidence used to help determine whether the identified housing and employment needs for the District can be met is the Housing and Economic Land Availability Assessment (HELAA). This identifies the availability and suitability of sites across the District with the potential to accommodate housing and employment as well as other uses.

The methodology for the Wycombe District Council HELAA is based on a joint methodology⁷ that has been agreed between the other Buckinghamshire Districts which make up the 'Housing Market Area'⁸. This sets out a 5 stage process:

Stage 1: Site / broad location identification (desk top and site surveys);

Stage 2: Site / broad location assessment (suitability, availability and achievability);

Stage 3: Windfall Assessment;

Stage 4: Assessment Review; and

Stage 5: Final evidence base (5 year housing land supply).

Updates to the technical evidence published in 2016 (including Green Belt and AONB assessments) have been carried out and these have informed the identification of sites through the HELAA as well as their potential capacity to accommodate development. The updated HELAA (September 2017) assessed that there is the potential to deliver 10,927 dwellings in the District up to 2033. This includes ten Green Belt sites identified as having 'exceptional circumstances' to be released from the Green Belt and provide 1,139 dwellings.

A Neighbourhood Plan is being prepared for Longwick-cum-Ilmer. In recent times there has been a significant amount of new development permitted in Longwick. The Neighbourhood Plan is looking to allocate six housing sites for development which could potentially deliver around 300 new homes.

A Landscape Appraisal for Great Kimble was completed in September 2017⁹. This assessed the development potential of land around Little Kimble, Great Kimble and Smokey Row, but outside of the AONB and the Green Belt. The appraisal found that there is the potential to accommodate around 137 dwellings without significant harm to the character of the landscape and setting of the AONB.

The table below sets out the sources of the housing supply and how they have changed since the Draft HELAA was published in 2015.

⁷ Central Buckinghamshire Housing and Economic Land Availability Assessment Methodology (May 2015)

⁸ Buckinghamshire housing market areas (HMA) and functional economic areas (FEMA) (March 2015)

⁹ Landscape Sensitivity & Capacity Study, Wycombe District Council (2017)

Table 5: HELAA sources of housing supply

Source of Housing Supply	Draft HELAA 2015 (Net Dwellings)	Publication HELAA 2017 (Net Dwellings)	Change in supply (Net Dwellings)
Reserve Sites	1,500	1,755	255
Green Belt review sites	900	1,139	281
Princes Risborough expansion area ^[1]	2,200	1,662	-538
Longwick	0	300	300
Kimble	0	160	160
Windfall	495	559	64
Other existing supply	3,988	5,310	1,322
Total	9,083	10,927	1,844

The table below sets out the sources of the employment supply identified through the HELAA against the employment need set out in the HEDNA.

Table 6: Employment supply against demand

	Demand	Potential Supply	Demand/Supply balance (+ = surplus supply against demand)		Potential new allocations		Balance taking account of potential allocations	
			Sq m	ha	Sqm	ha	Sqm	ha
B1a office	68,000	-1,000	-69,000	-14	14,000	3	-55,000	-11
B1c/B2 industrial	-48,000	-81,000	-33,000	- 8	50,000	13	17,000	4
B8 warehousing	34,000	-15,000	-49,000	- 10	30,000	6	-19,000	-4
Total	54,000	-97,000	-151,000	- 32	95,000	21	-57,000	-10

^[1] This is just the housing delivered up to April 2033 and excludes the Leo Labs site which is included in the "other existing supply" because it has a planning permission

2.1.3 Establishing the reasonable alternatives

Housing

The HELAA assessed that there is the potential to deliver 10,927 homes in the District up to 2033, which is below the identified need identified in the HEDNA Addendum. This results in a shortfall of 2,273 dwellings during the life of the Local Plan. This means that further consideration was given to whether there are any options that can result in meeting the objectively assessed need (OAN) in full within the District.

The emerging findings of the HELAA, HEDNA and wider assessments were discussed at a number of meetings between Council Officers and AECOM in 2017. This, along with the wider evidence and consultation responses received on the Draft Consultation Document (2016), informed the identification of a number of strategic options ('reasonable alternatives') at settlements and at the District level to be explored through the SA process for the Wycombe Local Plan at this stage.

In line with the National Planning Policy Framework (NPPF), it was decided that major growth within the AONB would not be appropriate and that there are no exceptional circumstances to justify it at this stage. Taking the constraints of the District into account and guidance from the NPPF (in particular Para 14), it was considered appropriate to once again consider potential options for delivering additional growth within those areas of the District that fall outside the AONB and Green Belt.

A new settlement in the north of the District was considered previously through plan-making and the SA process at the options and draft plan stages in 2014 and 2016 respectively. It was rejected at each stage as there were no available or suitable sites that could deliver the level of growth required and there is a limited amount of infrastructure in the area. There is no new evidence to suggest that the situation has changed so the reasons for rejecting this option are still considered valid.

The HELAA identifies the potential to deliver 2,500 dwellings during the life of the Local Plan at Princes Risborough through development in the existing urban area as well as through an urban extension. Alternatives for the expansion of Princes Risborough, including options for a new relief road, were considered at previous stages of plan-making. Most recently, options were developed and appraised through the SA Report that accompanied the Princes Risborough Town Plan on consultation in June 2016. Since the consultation ended there have been updates to the evidence base, which includes a landscape sensitivity and capacity study for Princes Risborough.¹⁰ It was therefore considered appropriate to reconsider alternatives for expansion at Princes Risborough to determine if there is the potential for additional growth to help meet OAN.

¹⁰ Wycombe District Council (2017) Landscape Sensitivity and Capacity Study for Princes Risborough.

Another alternative previously considered through plan-making was major expansion at other key locations on the transport network, which includes Kimble outside of the Green Belt and AONB. A recent Landscape Sensitivity and Capacity Study for the Kimble Area identified a number of sites with the potential to accommodate development.¹¹ As a result of this new evidence it was considered appropriate to reconsider potential growth options at Kimble.

Longwick village also sits outside the Green Belt and AONB; however, it has a limited range of services and facilities and poor public transport provision. A number of sites have been assessed and identified around the village, including through the Neighbourhood Plan process. Whilst little development was permitted at the base date of the Plan's housing supply information (April 2016) several schemes have come through to receive planning permission since then, limiting the choice for the Neighbourhood Plan. It is therefore not considered realistic and therefore reasonable to propose a higher level of growth for this village.

Taking the above into account, the two areas/ settlements identified as realistically having the potential to be able to deliver additional growth in the north of the District during the Life of the Plan and outside of the AONB and Green Belt are Princes Risborough and Kimble.

Princes Risborough

The following four growth options were identified in relation to Princes Risborough:

- **Option 1 - low growth scenario** (500 homes) Maximises brownfield development making efficient use of land within urban area and Park Mill Farm is an existing allocation in the 2004 local plan, close to the town centre subject to improvement of existing links.
- **Option 2 - moderate growth scenario** (1,400 homes) Includes option 1, develops an area of land between the railway line and the Crowbrook Stream which could form a natural boundary to an expansion, makes a significant contribution towards meeting OAN.
- **Option 3 - moderate to high growth** (2,400 homes) Option 1 plus Option 2, develops significant area of land towards the A4009, makes a very significant contribution towards meeting the OAN whilst offering potential to creating a compact form of development for the town, supports the delivery of a new road creating opportunity to relieve traffic through town centre.
- **Option 4 - high growth** (4,000 homes) Combination of options 1 - 3, makes greater contribution towards meeting the OAN.

Alongside the growth options a number of alternatives were identified for the delivery of the northern and southern sections of the proposed relief road to accompany

¹¹ Wycombe District Council (2017) Landscape Sensitivity and Capacity Study Kimble area.

development. The main SA Report (available separately) contains figures to illustrate all of the options.

Kimble

The basis for developing growth options at Kimble is the site options identified through the HELAA as well as other sites identified as being able to accommodate development through a Landscape Sensitivity and Capacity Study for the Kimble area.¹² Based on the evidence five growth options for Kimble were identified:

- **Option 1** - Expand Smokey Row (Approx 164 dwellings);
- **Option 2** - Expand Little Kimble (Approx 125 dwellings);
- **Option 3** - Promoted development between Smokey Row and Little Kimble (Approx 210 dwellings);
- **Option 4** - Sites with lowest landscape impact¹³ (Approx. 137 dwellings); and
- **Option 5** - Combination of one or more of the above.

The main SA Report (available separately) contains figures to illustrate all of the options.

District-wide spatial strategy options

Further to the consideration of additional growth at Princes Risborough and Kimble outlined above, it was also considered appropriate to explore the potential for increasing the density of housing to be delivered at sites across the District.

In addition, it was also considered appropriate to revisit the findings of the updated Green Belt assessment and include sites identified as performing more strongly against the Green belt purposes.

Taking the above into account, five alternative spatial strategy options were considered to be 'reasonable alternatives' and these are set out in more detail below, recognising that often they are extremely challenging in nature.

A large proportion of development proposed under each of the options is comprised of committed development, which includes completions (1,065 dwellings) and sites with existing planning permission (2,456 dwellings). Therefore, the variation between options reflects the following:

- the density of development to be delivered at sites,
- faster delivery at Princes Risborough expansion area;
- higher growth at Kimble; and
- additional Green Belt release.

¹² Wycombe District Council (2017) Landscape Sensitivity and Capacity Study Kimble area.

¹³ According to the Landscape Sensitivity and Capacity Study for the Kimble area (2017).

Table 7: The reasonable spatial strategy alternatives

	Option A - No GB release (9,800)	Option B - HELAA (10,927)	Option C - OAN with no additional GB release (13,200) Higher density + Faster delivery at Princes Risborough expansion area + higher growth at Kimble c20% uplift to density at Tiers 1 and 2. 10% uplift at Tiers 3-6	Option D - OAN with additional GB release (13,200) Plus c10% uplift to density across all tiers.	Option E - OAN Plus (15,000) additional Green Belt release and higher density + Faster delivery at Princes Risborough expansion area + higher growth at Kimble c20% uplift to density at Tiers 1 and 2. 10% uplift at Tiers 3-6 combined.
“Givens”					
Completions 2013-16	1,065	1,065	1,065	1,065	1,065
Permissions @ 1/4/16	2,456	2,456	2,456	2,456	2,456
Allocations in Delivery and Site Allocations Plan	569	569	569	569	569
Allocations in a 'made' neighbourhood plan	20	20	20	20	20
Windfall	559	559	559	559	559
Sub Total	4,669	4,669	4,669	4,669	4,669
High Wycombe					
Urban/PDL	862	862	1,034	948	1,034
Reserve Sites	1,605	1,605	1,926	1,766	1,926
Green Belt	0	520	624	1,349 Additional GB sites include: • Site SWC010 (48 dwellings) • Site SLW0025 (570 dwellings) • Site SWG0026 (88 dwellings)	1,471 Additional GB sites include: • Site SWC010 (48 dwellings) • Site SLW0025 (570 dwellings) • Site SWG0026 (88 dwellings)
Princes Risborough	1,739	1,797	2,572	1,977	2,572
Marlow	39	48	58	53	58
Bourne End	168	635	762	1,194 Additional GB sites include: • Site SWB0018 (450 dwellings)	1,302 Additional GB sites include: • Site SWB0018 (450 dwellings)
Tier 3 Settlements Flackwell Heath, Stokenchurch,	205	289	318	767 Additional GB sites include: • Site SLE0010 (82 dwellings)	767 Additional GB sites include: • Site SLE0010 (82 dwellings)

	Option A - No GB release (9,800)	Option B - HELAA (10,927)	Option C - OAN with no additional GB release (13,200) Higher density + Faster delivery at Princes Risborough expansion area + higher growth at Kimble c20% uplift to density at Tiers 1 and 2. 10% uplift at Tiers 3-6	Option D - OAN with additional GB release (13,200) Plus c10% uplift to density across all tiers.	Option E - OAN Plus (15,000) additional Green Belt release and higher density + Faster delivery at Princes Risborough expansion area + higher growth at Kimble c20% uplift to density at Tiers 1 and 2. 10% uplift at Tiers 3-6 combined.
Marlow Bottom, Naphill/Walter's Ash, Lane End,				<ul style="list-style-type: none"> • SMB0010 (33 dwellings) • Site SWC0070 (284 dwellings) • Site SLE0019 (9 dwellings) 	<ul style="list-style-type: none"> • SMB0010 (33 dwellings) • Site SWC0070 (284 dwellings) • Site SLE0019 (9 dwellings)
Tier 4 Settlements Hughenden Valley, Lacey Green Loosely Row, West Wycombe, Great Kingshill (including Heath End*), Longwick	425	425	1,054	468	1,054
Tier 5 Settlements	71	71	78	78	78
Tier 6 Settlements	6	6	7	7	7
Sub Total	5,120	6,258	8,560	8,604	10,396
Total	9,789	10,927	13,207	13,273	15,043

Employment

The scope for identifying options for the location of new employment land is limited by a number of factors - the same constraints that apply to housing i.e. the Green Belt, the Chilterns AONB and other environmental constraints as well as commercial market constraints, whereby there are a limited number of locations where commercial property would be delivered by the development industry. These locations are characterised as being close to existing centres of economic activity and an educated labour supply, well related and connected to the strategic road network and with accessibility to a range of supporting services. It should be noted that unlike housing, where a wide range of sites were promoted to the Council by landowners/developers as part of the preparation of the Local Plan, very few sites were promoted to the Council by landowners/developers for employment land.

The Council has explored all potential opportunities for delivering new employment land within the District based on the different levels in the settlement hierarchy, the evidence documents, the consultation responses and the earlier stages of the SA.

In considering employment land supply in the District over the Local Plan period, the HELAA considers the supply of employment sites but also takes account of potential losses of employment land, particularly as a result of office to residential conversions. This results in an overall shortfall of supply against demand forecasts. However this shortfall is effectively focused in one sector, namely the office sector. The surplus in industrial supply and shortfall in warehousing broadly balance out and indeed making slightly different assumptions about the split between industrial and warehousing on individual sites would even out the differences between the two, and a flexible approach to allocations would enable this to happen at the planning application stage.

The emerging findings of the HELAA, HEDNA and wider assessments were discussed at a number of meetings between Council Officers and AECOM in 2017. Further options, outside of those already considered by the Council, were discussed around how the shortfall in the office provision against the forecasts might be made up.

The NPPF¹⁴ requires that the plan should seek to meet the full OAN for employment needs. However, the scale of growth identified and the availability of potential sites presents the Council with a significant challenge. The constraints that have resulted in identifying insufficient sites to meet the OAN for housing namely the Green Belt, the Chilterns AONB and other environmental constraints apply to meeting the OAN for employment. In addition, in relation to employment land, and specifically land for offices, there is the additional constraint of the commercial property market.

¹⁴ Para 156 and 157

The Bucks Districts and Bucks Thames Valley LEP have commissioned evidence¹⁵ that suggests that the market is not strong enough to deliver more offices and that there is potential longer term structural change in the office market depressing the demand for office space. The HEDNA addendum recommends that the Council takes a cautious approach to allocating employment land to meet B class uses, to avoid planning for growth that ultimately does not materialise. It is further recommended that the strategy should be flexible in terms of allocating employment sites where the land is suitable for a range of B class uses. A separate report commissioned by the Council in relation to the High Wycombe Town Centre Office market¹⁶ also confirms the market constraints in the context of High Wycombe town centre, indicating that there is currently no development activity for new offices and, in addition to those sites that are already allocated in the Delivery and Site Allocations Plan where allowances are made in the HELAA for offices and the Staples site, there are no opportunities for new office floorspace in the town centre. In addition, there are sites that are permitted where there is currently no development activity and in some locations significant vacancies.

As such the evidence suggests that the inclusion of additional sites for offices that meet the OAN would result in allocating land for growth that may not materialise.

The allocation of rejected employment site options has been considered together with a consideration of re-focusing of proposed employment allocations to provide more offices and less other employment land. There were only a very limited number of rejected employment sites. The main one is the Westhorpe site at Marlow. In the light of market conditions, there is the possibility that additional provision of offices at rejected sites such as Westhorpe may undermine the take up of vacant floorspace elsewhere, such as in Globe Park, and potentially the take up of existing commitments (e.g. Handy Cross Hub), not ultimately resulting in an increase in floorspace or land developed.

In relation to re-focusing proposed employment sites to provide more offices, the floorspace assumptions included in the HELAA take account of what the market is likely to deliver on the site from a commercial perspective. As such assuming more offices will be provided on certain sites when the likelihood is that the market will not deliver offices is not considered to be a reasonable alternative.

The Green Belt review has identified that there are exceptional circumstances to release some sites from the Green Belt to meet employment needs; however, this is still insufficient to meet the full OAN.

A further option would be to re-allocate some housing land for offices. However, this risks jeopardising the housing strategy of the plan, increasing the shortfall that the plan has against the housing OAN. In addition many of those housing sites may not

¹⁵ Buckinghamshire HEDNA Addendum (September 2017)

¹⁶ An Assessment of the Office Market in High Wycombe Town Centre (March 2017)

be in commercially suitable locations for offices. As such this is not considered to be a reasonable alternative.

The allocation of rejected housing sites for offices will not only be the subject of the same site specific constraints for offices as for housing but will often also be in commercial unsuitable locations for offices meaning these are not reasonable alternatives.

Taking all of this into consideration, it would not be a reasonable alternative to assess meeting the full OAN for employment needs. In addition, given the existing shortfall of employment land it would not be a reasonable alternative to seek to deliver less than the supply identified in the HELAA.

At the FEMA level, the demand/ supply analysis included as part of the HEDNA Addendum (September 2017), concludes that there is sufficient employment land available to meet demand, as there are significant employment allocations and commitments in Aylesbury Vale District, including three new Enterprise Zones. However, these allocations/commitments are currently not in the sectors where the forecasts predict that there will be a shortfall in supply i.e. office and warehousing and consequently a flexible approach needs to be taken to allocating land for employment across the FEMA. If sectoral demand changes there is sufficient land available to meet the labour demand forecast.

As with the housing land supply position when considered against the housing OAN, as part of the Duty to Cooperate, the Council has been discussing with the other authorities in Bucks which make up the Functional Economic Market Area (FEMA), and with the Bucks Thames Valley LEP how employment land needs might be met across the FEMA.

A Memorandum of Understanding has been agreed with Wycombe, Aylesbury Vale, Chiltern and South Bucks Districts and the Buckinghamshire Thames Valley LEP. This sets out a flexible approach to the provision of employment land but recognises that the overall approach across the FEMA broadly delivers sufficient land for economic growth, taking into account a range of factors including an element of redistribution of growth from the three southern districts into Aylesbury Vale, to take account of their shortfalls due to their constrained nature.

2.2 Summary alternatives appraisal findings

For each of the options identified above, the assessment examines likely significant effects on the baseline, drawing on the sustainability objectives identified through scoping (see Table 1) as a methodological framework. The nature and significance of effects are categorised according to the symbols set out in the table below.

Finally, it should be noted that the appraisal for growth options and spatial strategy options is carried out against SA topics (which are linked to the SA Objectives), whereas the appraisal for the relief road options is carried out against individual SA Objectives. This approach reflects the higher level nature of the growth and spatial strategy options compared to the more site specific relief road options.

Table 8: Significance Key

Major positive	++
Minor Positive	+
Neutral	0
Uncertain	?
Minor Negative	-
Major Negative	--

2.2.1 Princes Risborough growth options

Table 9: Summary of appraisal findings for the Princes Risborough growth options

Options	SA Topics & Objectives								
	Biodiversity & Geodiversity (SA objective 1)	Landscape (SA objective 2)	Historic Environment (SA objective 3)	Natural Resources (SA objective s 4, 5 & 6)	Climate change (SA objective 4 & 5)	Housing (SA objective 8)	Transport and traffic (SA objective 7)	Community and wellbeing (SA objectives 9, 10 & 11)	Economy and employment (SA objectives 12, 13, 14 & 15)
Option 1 – Low growth	0 ?	0 ?	0 ?	-	0	+	?	+	+
Option 2 - Moderate growth	?	-	-	-	0	+	?	+	+
Option 3 - Moderate to high growth	- ?	--	--	--	+	++	+	++	++
Option 4 - High growth	-	--	--	--	?	++	+ ?	++	++

2.2.2 Princes Risborough relief road options

Table 10: Summary of appraisal findings for the Princes Risborough relief road options

Options	SA Objectives														
	1. Biodiversity	2. Landscape	3. Heritage	4. Water	5. Climate change	6. Best use of land	7. Transport	8. Population & Housing	9. Accessibility	10. Place-making	11. Health	12. Economy	13. Employment	14. Education	15. Economy
Northern relief road options															
Option 1 - through development area	-	-	-	-	0?	-	+	0	+	0	-?	0	0	0	0
Option 2 - wider bypass	-	--	-	-	-	--	+	0	+	-	-?	0	0	0	0
Option 3 - hybrid	-	-	-	-	-?	--	+	0	+	-	-?	0	0	0	0
Southern relief road options															
Option 1 - Picts Lane to A4010	0	-?	0	0	0?	-	+	0	+	0	0?	0	0	0	0
Option 2 - Picts Lane to A4010	0	-?	0	0	-?	-	+	0	+	0	0?	0	0	0	0
Option 3 - Picts Lane via Shootacre Lane to A4010	-	-?	0	0	-?	-	?	0	+	-	-?	0	0	0	0

2.2.3 Kimble Growth Options

Table 11: Summary of appraisal findings for the Kimble growth options

Options	SA Topics & Objectives								
	Biodiversity & Geodiversity (SA objective 1)	Landscape (SA objective 2)	Historic Environment (SA objective 3)	Natural Resources (SA objectives 4, 5 & 6)	Climate change (SA objective 4 & 5)	Housing (SA objective 8)	Transport and traffic (SA objective 7)	Community and wellbeing (SA objectives 9, 10 & 11)	Economy and employment (SA objectives 12, 13, 14 & 15)
Option 1 - Expand Smokey Row	0	0	-	--	+	+	-	?	?
Option 2 - Expand Little Kimble	0	0	-	--	--	+	-	?	?
Option 3 - development between Smokey Row and Little Kimble	0	--	-	--	-	+	?	?	?
Option 4 - Combination of one or more of the above	?	--?	--?	--	-?	++	?	?	?

2.2.4 Spatial strategy options

Table 12: Summary of appraisal findings for the spatial strategy options

Options	SA Topics & Objectives								
	Biodiversity & Geodiversity (SA objective 1)	Landscape (SA objective 2)	Historic Environment (SA objective 3)	Natural Resources (SA objectives 4, 5 & 6)	Climate change (SA objectives 4 & 5)	Housing (SA objective 8)	Transport and traffic (SA objective 7)	Community and wellbeing (SA objectives 9, 10 & 11)	Economy and employment (SA objectives 12, 13, 14 & 15)
Option A - No GB release (9,800 dwellings)	0	-	-	-	?	+	-	+	+
Option B - HELAA (10,927 dwellings)	0	-	-	-	?	+	- ?	+	+
Option C - OAN no additional GB release (13,200 dwellings)	-	-- ?	-- ?	--	+ ?	++ ?	--	+	+
Option D - OAN additional GB release (13,200 dwellings)	-	-- ?	-- ?	--	?	++	--	+	+
Option E - OAN Plus (15,000 dwellings)	-	--	--	--	+ ?	++ ?	--	+	+

All of the options seek to direct development towards existing settlements and focus on previously developed land where possible; however, ultimately they will all result in the loss of some greenfield and agricultural land. The appraisal found that as the level of growth increases, as a result of higher densities and the release of additional Green Belt sites, so does the likelihood and significance of negative effects in relation to biodiversity, landscape, historic environment, natural resources and transport and traffic.

It is recognised that all of the options will result in some development within and in close proximity to the Chilterns Area of Outstanding Natural Beauty (AONB). The increased density proposed through Options C, D and E is likely to result in a residual negative effect of greater significance on landscape and the historic environment compared to Options A and B. Increased density on sites within and in close proximity to the AONB reduces the likelihood that mitigation will be able to reduce the significance of residual effects. Mitigation is likely to be more difficult and/or expensive and could result in a development that is not in keeping with the surrounding local character and historic environment.

Emerging evidence suggests that even once mitigation is taking into account the growth proposed through Option B and the wider HMA has the potential to significantly affect travel time across High Wycombe and Bourne End at the Thames

River crossing as well as moderately impact travel time in Marlow and the A404¹⁷. Taking this into account it is considered that Option A is likely to have a reduced residual negative effect compared to the other options given the lower level of proposed growth. Options C, D and E are likely to have a residual negative effect of greater significance compared to Options A and B.

The increased density of development and additional Green Belt sites proposed through these options are likely to increase travel times further, particularly in High Wycombe and Borne End, and it is uncertain at this stage if there is suitable mitigation available. The increased rate of development at Princes Risborough and greater growth at Kimble could also increase the likelihood that there will be a greater impact on travel times in the Princes Risborough area even once mitigation is taken into account. It is recognised that a higher level of growth could provide further opportunities to improve transport infrastructure but this is uncertain at this stage. While there is reasonable public transport at Kimble, a greater level of growth in this area could increase the need to travel by private vehicle given the lack of facilities/ services on offer.

As the level of housing growth increases so does the significance of the positive effect in relation to the housing topic. Whilst Options A and B won't meet the identified OAHN for the District they will still have a long term positive effect on the housing objective by helping to meet some of the identified needs. Options C and D will meet the identified OAHN of the District and Option E will help to meet needs of the District as well as the wider HMA with a significant long term positive effect against the housing SA topic for all of these options.

It is difficult to accurately predict any significant differences between the options in terms of the community and wellbeing or economy and employment. All are likely to support existing as well as new services/ facilities and employment opportunities across the District with the potential for positive effects at the District scale. There is no evidence to suggest that increased density or additional development at Green Belt sites proposed through Options C, D and E would result in significant additional opportunities or improvements to the significance of positive effects predicted for these topics. Similarly, there is no evidence to suggest that faster delivery at Princes Risborough or additional growth at Kimble would deliver additional opportunities. Consequently, it is considered that all of the options have the potential for a long term minor positive effect on the economy and employment.

¹⁷ Buckinghamshire County Council (2017) Countywide Local Plan Modelling Phase 3 Technical Note, Final Draft.

2.3 The Council's response / justification for the preferred approach

The following text is in the form of a general discussion of the reasoning and justification behind the preferred approach.

2.3.1 Princes Risborough preferred approach

The preferred approach at Princes Risborough is for growth of up to 2,500 homes together with business and other related development. Key factors considered included ensuring the scale of growth was compact enough to maintain accessibility to main services and facilities in the town and to minimise the impact on the setting of the adjoining Chilterns AONB, particularly when viewed from the nearby Chilterns escarpment. Larger growth options increase environmental impact including landscape impact from the Chilterns AONB escarpment and increased flood risk in some areas. They also tend to result in greater travel distances to the main services and facilities increasing the risk of a higher proportion of journey by car rather than by more sustainable forms of transport. Lower levels of growth do not provide such a significant contribution to meet housing needs.

A further factor relates to the deliverability of the housing growth in terms of what is likely to be built in the local plan period to 2033, and hence contribute towards meeting the OAN up to 2033. A review of likely housing delivery rates suggests that not all of the 2,500 homes in the preferred scenario is likely to be delivered by 2033. Much higher allocated levels of growth in the expansion area are therefore unlikely to result in significantly higher build rates and hence will not significantly increase the contribution towards meeting the OAN up to 2033.¹⁸ Option 11b has been identified as the preferred option for the relief road, taking into account the appraisal and other more detailed and technical assessments including other factors such as the feasibility and deliverability of the road.

2.3.2 Kimble preferred approach

Great and Little Kimble (including Smokey Row) is a cluster of small villages with very limited local services and facilities but does benefit from reasonable public transport provision, due to the inter urban High Wycombe to Aylesbury bus service and a rail station with an infrequent service on the single track Aylesbury to Princes Risborough line. Some parts of the villages lie within the Green Belt and AONB and some lie immediately beyond. However they all lie within the setting of the AONB, immediately beneath the Chilterns escarpment.

Assessment of the landscape capacity identified scope for accommodating approximately 160 homes, this number is limited by the impact of development on the setting of the AONB. In addition however, it is considered that the level of

¹⁸ See Housing Delivery Study for Buckinghamshire, Wessex Economics, August 2017

services and facilities are extremely limited, lowering the sustainability credentials of this location. The Proposed Submission Draft Local Plan proposes the delivery of 160 homes in the Parish of Great and Little Kimble-cum-Marsh over the Plan period. No specific allocations are proposed as these will come forward through the emerging Neighbourhood Plan for the Parish.

2.3.3 Spatial strategy preferred approach

The preferred spatial strategy (Option B) is informed by identifying sites in the most sustainable locations in accordance with the Council's settlement hierarchy¹⁹. In addition to this it is based on an assessment of density and capacity at the site specific level, which aims to recognise both on-site and off-site constraints, reflecting the nature of the District, particularly its highly sensitive nature in landscape and topographical terms. This means that impacts are particularly sensitive to development capacities and densities.

The strategy seeks to maintain strong protection of the Green Belt (whilst fully exploring the potential for release of Green Belt land) by only proposing that sites that perform weakly/relatively weakly against the 5 Green Belt purposes (or do not perform any Green Belt purpose at all) are identified for development. The strategy also seeks to protect the Chilterns AONB by proposing sites that are not "major development in the AONB". This approach to both Green Belt and development in the AONB is consistent with national planning policy.

The higher growth options would result in a level of growth at Princes Risborough that would not be deliverable in the period the plan is covering. In relation to Kimble a higher level of growth would have an impact on the setting of the AONB and would not be supported by the infrastructure/ local services available.

Having already raised densities on a number of sites following the findings of a review of housing capacity after the consultation on the Local Plan Consultation Draft Document (2016) including in response to housing capacity issues raised by Aylesbury Vale District Council, it is considered that the densities being assumed for the preferred spatial strategy are already quite high, especially for urban sites. It is therefore considered that increasing the densities further would not be appropriate and could result in a greater adverse effect on the landscape and on the AONB and its setting.

In addition it is considered, given the continued strong national emphasis on the protection of the Green Belt that release of further land from the Green Belt, including sites that perform Green Belt purposes to a moderate or strong level would cause significant and demonstrable harm to the Green Belt that outweighs the benefit of delivering higher levels of housing.

¹⁹ Wycombe District Council (2016) Settlement Hierarchy Study. Available [online]: <https://www.wycombe.gov.uk/uploads/public/documents/Planning/New-local-plan/Settlement-heirarchy-study.pdf>

The Council considers that it has explored all the reasonable opportunities for delivering housing in the District and that process has involved consulting on a wide range of options and reviewing those options resulting in the identification of additional capacity as the process has progressed.

Similarly in relation to employment development all the reasonable alternatives have been explored in determining the preferred strategy. In addition to the constraints of the District that apply to considering the housing options, the nature of the commercial property market and in particular the weakness of the office market over a significant period of time places an additional constraint on the overall employment land strategy.

Given these constraints to meeting the full objectively assessed need for housing and employment land the Council has been working closely with the other councils in Buckinghamshire (i.e. in the housing market area/functional economic market area) and the Bucks Thames Valley LEP to address the issue of unmet needs. This has resulted in a Memorandum of Understanding being agreed that involves the Vale of Aylesbury Local Plan accommodating the 2,275 unmet housing need from Wycombe District and that also recognises that there will also be an element of re-distribution of employment land provision to Aylesbury Vale from Wycombe District (and from Chiltern and South Bucks districts) as a result of shortfalls in those southern districts and surpluses in Aylesbury Vale.

3. Appraisal findings at this stage

Part 2 of the SA Report answers the question - What are appraisal findings at this stage? - by presenting an appraisal of the Proposed Submission Draft Local Plan. Appraisal findings are presented under nine sustainability topic headings (see Table 1, above), with each narrative ending in concluding paragraphs, which are provided below.

3.1 Biodiversity

The appraisal has found that none of the proposed allocations alone are likely to result in a significant residual negative effect on biodiversity. There is sufficient mitigation provided through area based and other development management policies that seek to retain and manage important habitats and connectivity, minimise impacts and seek enhancements for biodiversity where possible.

The Habitats Regulations Assessment screening report concluded that the draft plan is not likely to have a significant effect on any internationally designated sites. The draft plan is not considered likely to have a significant residual negative effect on biodiversity as a result of increased recreation, reduced water quality or reduced water levels. There are sufficient alternative areas for recreational activity on offer within and surrounding the District and evidence suggests that the draft plan will not have a significant effect in terms of water quality and resources.

Given the findings of the appraisal under the transport and traffic and natural resources topics, there is the potential for the draft plan to have impacts on biodiversity as a result of increased traffic and associated atmospheric emissions. It is noted that this could be a particular issue for Ancient Woodlands that are within 200m of a major road that is likely to see a significant increase in traffic. The appraisal under the natural resources topic recommends that the draft plan includes stronger policy measures in relation to air quality.

Overall, a **residual minor negative effect** on biodiversity is predicted at this stage as a result of increased atmospheric emissions from traffic. There is an element of uncertainty as this will be dependent on the implementation of development/ infrastructure, including mitigation delivered.

3.2 Climate change

The draft plan positively addresses climate change given the support for on-site renewable energy generation and/or low-carbon, decentralised energy generation within the Princes Risborough Expansion Area. Whilst this is supported by Policy CP12 (Climate Change), further consideration should be given to the potential of the

rest of the plan to deliver sustainable design and construction above the standards set by Building Regulations where viable.

The draft plan directs the majority of development towards areas of low flood risk and seeks to ensure that it is appropriately flood resilient and resistant. All development within higher risk areas is to include the provision of integrated and maintainable SuDS, addressed through policy and site work. Additionally, adherence to the recommendations and guidance presented in the SFRA will help limit effects. On balance, a **residual neutral effect** is predicted at this stage for climate change.

3.3 Community and wellbeing

The draft plan directs growth to the most sustainable locations for development in the District.²⁰ The plan proposes development that will deliver improvements to and the provision of new community infrastructure, to benefit both new and existing communities.

With regards to site specific and District-wide thematic policy, a variety of measures are proposed that will seek to ensure that any negative impacts of growth on communities are minimised, and the potential positives realised. In a number of instances, site specific policy provides details for on-site and/or off-site community infrastructure that should be delivered as part of any development scheme, taking into consideration area specific limitations and opportunities.

Overall, it is predicted that the draft plan will have a **significant long term positive effect** on community and wellbeing.

3.4 Economy and employment

Evidence suggests that the scope for providing new employment within the District is limited as a result of constraints - topography (lack of flat land), AONB and Green Belt - and viability considerations. In response to this, the draft plan seeks to safeguard existing strategic and local employment areas from non-business development. It also proposes to deliver 21ha of new employment land to help meet the identified needs of the District. A Memorandum of Understanding has been signed for Buckinghamshire which will allow some of the surplus opportunities for employment land provision in Aylesbury Vale to meet some of the unmet employment needs as assessed against the forecasts for Wycombe District. Overall across the FEMA there is sufficient land to meet the forecast for jobs, but currently a mismatch within the B uses class sectors.

The draft plan supports opportunities to develop key employment sectors including industrial occupiers situated in Cressex Business Park, and the established office

²⁰ Wycombe District Council (2016) Wycombe District Local Plan Settlement Hierarchy Study: Final Report

locations at Old Staples, Queen Alexandra Road. It also seeks to regenerate and enhance the vitality and viability of existing town centres, and supports opportunities for development that will improve education skills and training. Furthermore, it also seeks to facilitate rural enterprise and diversification. Overall, it is predicted that the draft plan will have a **significant long term positive effect** on the District's economy and employment.

3.5 Historic environment

The spatial strategy directs the majority of development towards existing settlements and focuses on previously developed land where possible. While this has the potential for negative effects on heritage assets in these areas it also helps to reduce potential impacts on the character of the rural area and heritage assets found there. The strategy attaches great weight to conserving the landscape and scenic beauty of the AONB. The redevelopment of brownfield sites also provides an opportunity to remove existing development that is detracting from the significance of heritage assets and the wider historic environment. This coupled with improvements to accessibility and signage has the potential to enhance the historic environment with a long term positive effect.

There is the potential for negative effects on the historic environment as a result of development at a number of proposed allocations; however, policies including CP11 (Historic Environment) and DM31 (Development Affecting the Historic Environment) should reduce the significance of any residual negative effects for the majority of sites so they are not major. The major residential led expansion of Princes Risborough is likely to result in residual long term negative effects on the historic environment. The expansion area encompasses the Alscot Conservation Area as well as a number of listed buildings and development would result in the loss of large areas of greenfield and agricultural land which would alter the rural character of the area. The importance of the historic environment in and surrounding Princes Risborough is recognised through the draft plan and policies seek to minimise the impacts of proposed development and maximise opportunities for enhancement where possible. There is a clear strategy and vision for the historic environment of Princes Risborough, "In 2033, Princes Risborough will be a modern, green and accessible market town with a safe and vibrant community, which strongly reflects its historic roots, rich cultural heritage and special landscape setting."

It is difficult to conclude with any certainty if the draft plan as whole will have a residual positive, negative or neutral effect on the historic environment. There is the potential for residual positive effects through the redevelopment of brownfield land as well as negative effects in some localised areas, including Princes Risborough. The spatial strategy recognises the importance of the historic environment and that the character of heritage assets, including non-designated heritage assets, needs to be retained, particularly in areas where there is pressure from development. On

balance, it is considered that the **residual effect of the draft plan is uncertain** at this stage and will ultimately be dependent on the implementation of proposed development and policies.

3.6 Housing

The Buckinghamshire Housing and Economic Development Needs Assessment (HEDNA)²¹ identified that the Objectively Assessed Housing Need (OAHN) for the District is 13,200 homes from the period 2013-2033. The draft plan is not able to meet the identified OAHN, proposing the delivery of 10,925 dwellings during the life of the plan. This is primarily as a result of significant constraints in the District, which includes large areas of land designated as AONB and Green Belt. As part of the Duty to Co-operate and in line with national planning policy, Aylesbury Vale District Council has agreed to deliver 2,275 homes through their emerging Local Plan to address the unmet housing need within Wycombe District.

The draft plan focuses the majority of development at the larger settlements but also directs an appropriate number of new homes towards smaller settlements in more rural areas. This will help to meet the housing needs for all communities within the District. The draft plan also sets out affordable housing requirements for new developments of 30-40%, which will help meet the identified needs within the District. Furthermore, there are also policies that seek for a range of specific and specialist housing needs to be met, which includes meeting the needs of Gypsy, Traveller and Travelling Showpeople communities, and providing for rural exception housing. The draft plan also seeks to deliver a suitable mix of housing to ensure that the needs of all residents are addressed.

The draft plan will have a **significant long term positive effect** on this topic through the delivery of new homes to help meet identified needs and policies that seek to provide a suitable mix of housing for all residents.

3.7 Landscape

The draft plan attaches great weight to conserving the landscape and scenic beauty of the AONB and the landscape has been a key consideration in the development of the draft plan, influencing the overall level of growth to be delivered and its location across the District. The spatial strategy focusses development on previously developed land where possible but in order to maximise the potential for the District to deliver growth and meet identified OAHN there is also a need for some development on greenfield sites at the edge of settlements within and in close proximity to the AONB.

²¹ Buckinghamshire Housing and Economic Development Needs Assessment (HEDNA) (December 2016 and Addendum, September 2017)

There is the potential for positive effects through the regeneration of previously developed land but also the potential for negative effects as a result of development within and in close proximity at the to the AONB. The expansion of Princes Risborough helps to reduce the level of growth within the AONB although it is recognised that there is still the potential for a negative effect on its setting as a result of the scale of development in this area.

Draft plan policies seek to both protect and enhance landscape assets, and use them positively in development to establish a sense of place. This is reinforced through site specific policies, which demonstrate that a landscape-led approach has been taken to development design and layout to minimise impacts on the AONB and the wider landscape character. Site specific requirements include retaining and managing existing hedgerow and woodland boundaries for screening purposes, and providing off site planting to reinforce site boundaries.

The draft plan has the potential for both positive and negative effects on landscape in localised areas across the District. It is difficult to conclude with any certainty what the residual effect for the landscape character of the District as a whole will be. Ultimately, the development on greenfield sites at the edge of existing settlements that are within or in close proximity to the AONB are likely to affect its setting to some degree and therefore have a residual negative effect. While not within the AONB, the expansion of Princes Risborough will have an impact on the landscape character in the north of the District and potentially affect the setting of the AONB. On balance, it is considered that there is the potential for a **residual minor long term negative effect** on the landscape. The significance of the residual effect will be dependent on the implementation of proposed development and policies.

3.8 Natural resources

The draft plan focuses development on previously developed land where possible which is positive for this topic through the efficient use of land. However, in order to deliver more housing and try to meet identified housing needs the draft plan also proposes growth on sites that will result in the loss of greenfield and agricultural land. This includes some sites that contain best and most versatile agricultural land, which has the potential for a residual negative effect on this topic.

There are existing issues around the capacity of the road network as well as air quality within the District, primarily within High Wycombe. Evidence suggests that even with mitigation there is likely to be significant increases in travel time on key routes including the A40 corridor and High Wycombe Town Centre. There is therefore a potential for a residual negative effect on this topic through reduced air quality; however, it is recognised that the delivery of the relief road as part of the Princes Risborough Expansion Area could help to reduce travel times in that area. The SA recommends that draft plan includes stronger policy measures in relation to

air quality. This could include encouraging development to provide infrastructure supporting the use of alternative vehicle types and fuels.

In terms of water resources and quality, the evidence available suggests that the level of growth proposed through the draft plan can be accommodated without any significant residual effects.

The draft plan includes a range of policies that seek to minimise impacts on natural resources and ensure that appropriate infrastructure is delivered to serve new development. This includes policies that seek to improve accessibility to sustainable transport modes. The strategy of focussing development in the larger settlements with greatest offer of facilities/ services and employment opportunities will also help to reduce the need to travel.

On balance, it is considered that there is the potential for the draft plan to have a **residual minor negative effect** on this topic. The significance of the effect is uncertain at this stage and will be dependent on the implementation of development and proposed mitigation.

3.9 Transport and Traffic

The draft plan will deliver housing, employment, and associated improvements to services/facilities and public transport, which has the potential for positive effects on transport and traffic by helping to increase accessibility to sustainable transport modes and reducing the need to travel/ reliance on the private vehicle.

The draft plan seeks to maximise opportunities for north-south connectivity, especially between the Aylesbury and High Wycombe, to get the most economic, environmental and social benefit from the geographical position of the District within the County. Site specific and thematic policy is in place to address strategic and local transport matters, crucial to economic development. Policy requirements include investing in public transport and walking and cycling to help manage local congestion, particularly in High Wycombe. The proposed growth at Princes Risborough Expansion Area seeks to deliver supporting infrastructure to reduce pressure on the town centre and radial roads, including through the provision of a new relief road as an alternative to the existing A4010. It also takes advantage of the opportunity offered by the East West Rail project, which seeks to establish a strategic railway connecting East Anglia with Central, Southern and Western England.

Countywide transport modelling found that whilst mitigation does provide travel time reductions in some locations, for example at the eastern end of the A40 corridor, there are still significant travel time increases in other areas as a result of growth proposed in the HMA. This is particularly an issue in the centre of Wycombe, on the M40 and on the main road corridors. Travel time increases are also shown for

Bourne End as a result of increased congestion on A4094 Ferry Lane and the Thames River Crossing.

On balance, it is considered that there will be a **residual minor negative effect** at this stage, based on the evidence available.

3.10 Cumulative effects

Cumulative effects occur from the combined impacts of policies and proposals on specific areas or sensitive receptors. In the context of SA/SEA, cumulative effects can arise as a result of the in-combination and synergistic effects of a plan's policies and proposals. Comprising 'intra-plan' effects, these interactions have been discussed earlier in this section, which evaluate the in-combination and synergistic effects of the various policies of the draft plan.

Cumulative effects can also result from the combined impacts of a plan with impacts of another plan, or the 'inter-plan' effects. These can affect the same receptor, resulting in in-combination or synergistic effects. The Wycombe Local Plan therefore has the potential to combine with other planned or on-going activities in the vicinity of the District to result in cumulative effects.

Aylesbury Vale, Chiltern, South Bucks and Wycombe District Councils undertook a joint Housing and Economic Development Needs Assessment (HEDNA) for the Buckinghamshire Housing Market Area (HMA) and Functional Economic Market Area (FEMA) which was published in December 2016 together with a HEDNA Addendum (September 2017).

The HEDNA and subsequent update identified that the OAHN for the three Local Plan areas comprising the Buckinghamshire Housing Market Area are as follows:

Table 13: Objectively assessed need in the Bucks HMA

Local Planning Authority area	OAHN
Aylesbury Vale	19,400 dwellings per annum
Chiltern and South Bucks	12,900 dwellings per annum ²²
Wycombe	13,200 dwellings per annum
Bucks HMA	45,500 dwellings per annum

The Local Plans for the four Local Planning Authorities (LPAs) will be required to demonstrate how assessed housing need will be delivered in their administrative areas. As such, the in-combination effects of housing growth across the LPA areas have the potential to lead to cumulative effects. Furthermore, the combination of

²² Note that the Chiltern and South Bucks plan period is 2014-36 but figure shown are 2014-33 for consistency purposes in relation to the end date of the Wycombe and Aylesbury Vale plan periods.

Local Plan proposals and other proposals being taken forward in the wider area has the potential to lead to cumulative effects. This may include the following:

- Increases in traffic flows and congestion from the in-combination effects of development, with potential impacts on air and noise quality. This has been identified as an issue through the Countywide modelling. However the in-combination effects of proposals on enhancing public transport and pedestrian and cycle infrastructure may help limit potential negative effects and secure positive effects in this regard. A Countywide/ sub-regional approach will be needed to address the predicted journey time increases as a result of proposed development in the HMA and beyond.
- Cumulative impacts on ecological networks. This is from the in-combination effects of new development and associated infrastructure on habitats and biodiversity corridors. However, enhancements to green infrastructure provision facilitated through draft plan proposals and other projects in the area have the potential to support local, sub-regional and regional ecological networks.
- Incremental erosion of green and open space as a result of the need to deliver objectively assessed need, and associated cumulative impacts on landscape character and the historic environment from new development. While it is assumed that LPAs will not propose any major development within the Chilterns AONB through their Local Plan, there is still the potential for development proposed within the Bucks HMA and surrounding areas to have a cumulative negative effect on its setting depending on where it is proposed. The Chilterns Conservation Board will need to maintain a strategic overview of the development being proposed within and in close proximity to the AONB. There is also the potential for cumulative negative effects on the wider historic environment and setting of designated heritage assets.
- Impacts on flood risk from the in-combination effects of new development, including relating to surface water and fluvial flooding. However, the provisions of the NPPF and measures and policy approaches implemented through the relevant plans and proposals will limit the significance of effects.
- Improvements to accessibility resulting from the in-combination effects of enhancements to public transport and walking and cycling networks. This includes proposed improvements to connections between Oxford and Cambridge through the East West Rail project.
- Impacts on the urban heat island effect (a key likely impact of climate change) from an intensification of land uses across the wider area. This however has the potential to be offset by enhancements to sub-regional green infrastructure networks and open space provision.

As highlighted above, for many potential cumulative effects, the policy approaches proposed by the current draft plan will help reduce the significance of these in-combination impacts. However, monitoring for the various Local Plans will be a key

means of ensuring that unforeseen adverse environmental effects are highlighted, and remedial action can be taken where adverse environmental effects arise.

3.11 How have the findings of the SA been taken into account?

The findings of the SA for the draft plan have influenced the development of the Local Plan. The recommendations made through the SA at this stage and how they have been taken into account through plan-making are set out in the Table below.

Table 14: SA recommendations for the draft plan

Policy/ SA topic	SA Recommendation	How did the SA influence plan-making?
General Air quality	<ul style="list-style-type: none"> That draft plan includes stronger policy measures in relation to air quality This could include encouraging development to provide infrastructure supporting the use of alternative vehicle types and fuels. 	<p>Included a new clause (c) in Policy DM33: <u>c) Make provision for alternative vehicle types and fuels.</u></p> <p>Include the following within the supporting text: <u>'Provision for alternative vehicle and fuel types will need to take into account forecast market demand, and the most recent evidence in relation to air quality. This will vary with location and for of development, but as a minimum needs to make passive provision to allow for future flexibility'.</u></p>
HW6 Biodiversity	<ul style="list-style-type: none"> It is recommended that the policy makes reference the designated sites (including GOMM Valley SSSI) within the proposed development boundary and requires any proposal for development to avoid and protect them as well as seek enhancements where possible. 	<p>Amended clause 3 in Policy HW6 to read:</p> <p>3. Conserve and enhance existing nature conservation interests and green infrastructure, <u>and facilitate the provision of new habitats</u> by: a) <u>minimising the effects of severance and disturbance on existing and proposed habitats caused by access and development;</u> b) <u>Retaining, and providing appropriate buffers to, designated sites...</u></p> <p>Include additional supporting text to explain what is expected in terms of buffers for Ancient Woodland and SSSIs: <u>These buffers are to be free of any development, including gardens. These distances would only be reduced if there was a clear and compelling case that this would result in overriding benefits to the scheme as a whole.</u></p>
RUR7 Biodiversity	<ul style="list-style-type: none"> This policy could include further specific mitigation requirements in line with those recommended within the HRA 	<p>This approach is already covered by policies DM 13 and Dm14 in the adopted DSA, which cover DM13 Conservation and Enhancement of Sites, Habitats and</p>

Policy/ SA topic	SA Recommendation	How did the SA influence plan-making?
	Screening Report ²³ and the Chilterns Beechwoods Site Improvement Plan ²⁴ . The policy should also seek to secure opportunities to enhance biodiversity and include measures to contribute to a net gain in biodiversity, particularly for qualifying habitats and species of the SAC.	Species of Biodiversity and Geodiversity Importance; and Biodiversity In Development.
RUR 11 Biodiversity	<ul style="list-style-type: none"> This policy could be further enhanced by including specific mitigation strategies and/or enhancement for the woodland. 	<p>Amended policy RUR11 as follows:</p> <ol style="list-style-type: none"> 1. provide access of high Heavens Wood; 2. <u>provide a buffer to the ancient woodland to the north of the site [with supporting text saying 15m and no gardens]</u> 3. <u>minimise the disturbance effect of adjacent development of the other surrounding woodland</u> 4. <u>provide measures to enhance the biodiversity value of the ancient woodland, and other woodland surrounding the site</u> 5. <u>avoid an adverse impact on surface water flood risk</u>
DM34 Biodiversity	<ul style="list-style-type: none"> Whilst the policy is heavily focused on the green infrastructure network, Policy DM34 may be improved by including specific references to Ancient Woodland in the District. National guidance and best practice highlights Ancient Woodland as a key habitat for protection. Given the extensive number of Ancient Woodland sites within the District, safeguarding and enhancing them should be clearly set out within policy. The policy 'Trees and Hedgerows' has been deleted (previously included in the 2004 Local Plan), however considering the existing volume of Ancient Woodland covering the District, and 	<p>This is already covered by adopted Policy DM13. However, to strengthen the plan and address this recommendation a new criterion has been added under item 3 of Policy CP10:</p> <ol style="list-style-type: none"> a) <u>protecting designated sites and through management plans ensuring their biodiversity value will be enhanced.</u> <p>Supporting text has also been amended to list designated sites and make reference to management plans.</p>

²³ Wycombe District Council (2017) HRA Screening Report for the Local Plan Publication Version.

²⁴ Natural England (2015) Improvement Programme for England's Natura 2000 Sites (IPENS): Site Improvement Plan Chiltern Beechwoods

Policy/ SA topic	SA Recommendation	How did the SA influence plan-making?
	<p>individual trees worthy of retention, a specific policy would be of value to the Plan. The policy could require specific development to include woodland and tree management plans, ensuring ensure the protection and long term maintenance of this biodiversity asset.</p>	
CP12 and DM33 Climate change	<ul style="list-style-type: none"> The opportunity to achieve high standards of energy efficiency that go over and above building regulations should not be overlooked. There may be opportunities for energy efficiency throughout development proposals, and this should be encouraged through policy. A separate renewable energy policy would have positive effects for the sustainability performance of the plan. Recommendations for development could include the preparation of Energy Statements to be submitted as part of proposals to demonstrate how the 'energy hierarchy' has been applied and carbon emissions minimised 	<p>Amended Policy CP12, criterion 7 to read: 'Support the integration of renewable technologies into residential and commercial developments of all sizes and the use of district heating or combined heat and power schemes on large scale developments'.</p> <p>Policy DM33 has been renamed to 'managing carbon emissions: transport and energy generation'. It has also been amended to include two new criteria: <u>g) Integrate renewable technologies into developments.</u> <u>h) Investigate, and where feasible implement, district wide energy or heating schemes, for larger scale developments.</u></p>
Area Policies Climate change	<ul style="list-style-type: none"> Site specific policies would be enhanced if individual references were made to any particular renewable opportunities that exist - For example, this could be where there may be an opportunity for the development of adjacent schemes to be coordinated (e.g. sharing a heating network) ahead of low carbon infrastructure 	<p>No change. There is no evidence to justify the inclusion individual/ specific references to renewable opportunities.</p>
CP12 Climate Change	<ul style="list-style-type: none"> It is recommended that consideration is also given to decentralised electricity supply, in addition to heating. 	<p>Policy CP12 has been amended to reflect this recommendation.</p>
DM39 Climate Change	<ul style="list-style-type: none"> This policy could be updated to reference stakeholder engagement, including 	<p>This is not appropriate for inclusion in a development management policy, the council is part of a countywide Technical</p>

Policy/ SA topic	SA Recommendation	How did the SA influence plan-making?
	considering cross-boundary flood risk and management, which would be in line with SFRA recommendations	Flood Management group which amongst other things covers local flood issues and strategic planning proposals, policies and plans
HW8 Transport	<ul style="list-style-type: none"> The policy could be strengthened by requiring any proposal for development to demonstrate how it will deliver improved access to existing bus routes. 	Amended Policy HW8 from 'investigate the scope for improving access to existing but route' to, ' <u>improve access to existing bus routes</u> '.
HW5 Community and wellbeing	<ul style="list-style-type: none"> The policy includes references to new links and footpath/cycle networks to increase connectivity across the development area; however, further detail on this infrastructure would help to strengthen the policy. 	This is already covered in the development brief for the site.
HW7 Landscape	<ul style="list-style-type: none"> Given the close proximity of the AONB there is the potential for the policy to be strengthened by including specific landscape requirements. 	Included ' <u>landscape</u> ' in part 2 of Policy HW7 and on the end of point b, about Lady's Mile, added ' <u>and the setting of the AONB</u> '.

4. Next steps

Part 3 of the SA Report answers - What happens next? - by discussing plan finalisation and monitoring.

4.1 Plan finalisation

Subsequent to publication stage, the main issues raised will be identified and summarised by the Council, who will then consider whether the plan can still be deemed to be 'sound'. Assuming that this is the case, the plan (and the summary of representations received) will be submitted for Examination. At Examination a government appointed Planning Inspector will consider representations (in addition to the SA Report and other submitted evidence) before determining whether the plan is sound (or requires further modifications).

If found to be 'sound' the plan will be formally adopted by the Council. At the time of adoption an 'SA Statement' will be published that sets out (amongst other things) 'the measures decided concerning monitoring'.

4.2 Monitoring

At the current time, there is a need only to present 'measures envisaged concerning monitoring'. The draft plan includes a range of proposed monitoring indicators, with each indicator attached to a plan objective. The table below lists a selection of the Council's proposed measures that are of relevance to the SA topics.

Table 15: Proposed monitoring measures

SA topic	Relevant indicators proposed in the draft plan
Biodiversity	<ul style="list-style-type: none"> Extent to which the applications lead to a net increase in biodiversity. SSSI condition status.
Climate change	<ul style="list-style-type: none"> Extent to which new blue and green infrastructure features have been integrated into developments. Percentage of applications that achieve 25% canopy cover.
Community and wellbeing	<ul style="list-style-type: none"> Number of planning applications (including on appeal) that are permitted in the GB under very special circumstances Extent to which town centre enhancements have been implemented
Economy and employment	<ul style="list-style-type: none"> Numbers of applications for, and floor space of, non-business uses in Strategic Employment Areas and separately in Local Employment areas. Net Floor area for new B1a accommodation, by location. Net increase/decrease in retail floorspace by town centre by planning application.
Historic environment	<ul style="list-style-type: none"> Extent to which natural and historic features have been

	<p>integrated and enhanced in developments.</p> <ul style="list-style-type: none"> • Extent to which developments achieve the outcomes of the residential design guide. • Extent to which development optimises density to make the base use of land whilst respecting the distinctive character of the area. • Number of planning applications and listed building applications approved against professional historic environment advice. • Number of buildings on the register, and number of years they have been on the list. • Number of conservation areas without an appraisal. • Whether there have been additions to the local list, and if so how many. • Whether any locally listed buildings have been demolished, and if so how many. • Number of planning applications for historic parks and gardens approved against professional advice on historic landscapes.
Housing	<ul style="list-style-type: none"> • Numbers of homes built each year, and cumulatively over the plan period, as a proportion of the target, against the remainder of the plan period. • Number of affordable homes built, split into tenure types, each year, and cumulatively over the plan period. • Number of homes for older people each year and cumulatively. • Number of pitches and plots each year and cumulatively as a proportion of the target against the remainder of the plan period.
Landscape	<ul style="list-style-type: none"> • Number of planning applications permitted (including on appeal) that are major developments in the AONB. • Extent to which development optimises density to make the base use of land whilst respecting the distinctive character of the area. • Number of planning applications approved against professional landscape advice.
Transport and traffic	<ul style="list-style-type: none"> • Monitoring carried out by Buckinghamshire County Council for the Local transport Plan.
Natural resources	<ul style="list-style-type: none"> • Percentage of homes built on brownfield homes, by year and cumulatively • Continuous and non-continuous air quality monitoring already being carried out by the Council.