

Strategic Environmental Assessment (SEA) for the Buckingham Neighbourhood Plan

Environmental Report supporting Regulation 14 consultation

July 2024

Quality information

Prepared by	Checked by	Verified by	Approved by
CB: Principal Environmental Planner	IM: Associate Director	MF: Associate Director	MF: Associate Director

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Prepared for:

Buckingham Town Council

Prepared by:

AECOM Limited
 3rd Floor, Portwall Place
 Portwall Lane
 Bristol BS1 6NA
 United Kingdom

T: +44 117 901 7000

aecom.com

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Non-Technical Summary (NTS)

Introduction

AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging Buckingham Neighbourhood Plan. The Buckingham Neighbourhood Plan is being prepared under the Neighbourhood Planning Regulations 2012 (as amended) and in the context of the local planning framework of Buckinghamshire Council. Once 'made' the Buckingham Neighbourhood Plan will hold material weight when deciding on planning applications in the neighbourhood area, as part of the local development framework for Buckinghamshire.

SEA is a required process for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating potential negative effects and maximising potential positive effects.

This Non-technical Summary (NTS) provides a summary of the Environmental Report for the Buckingham Neighbourhood Plan. It is published alongside the Plan under Regulation 14 of the Neighbourhood Planning Regulations 2012 (as amended).

SEA reporting essentially involves answering the following questions in turn:

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?

Each of these questions is answered in turn within a discrete part of the Environmental Report and summarised within this NTS.

In relation to the Local Plan context, there is a relatively recently adopted Vale of Aylesbury Local Plan, from 2021, which identifies a growth target for Buckingham of around 2,177 new homes up to 2033 – some of which have already been met through the made neighbourhood plan. A further two sites within Buckingham are expected to meet the housing target alongside windfall and development completions. However, since the formation of the Buckinghamshire Council in 2020, work has been underway on a new Local Plan covering the new district area. This is at an early development stage, and does not currently identify an appropriate / expected level of growth within the Buckingham neighbourhood area over the new plan period. However, it is likely the new Local Plan will revisit the growth target for Buckingham.

The vision of the Buckingham Neighbourhood Plan, which is supported by 12 objectives, is as follows: *"Make Buckingham a better place to live, work, study and play"*.

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. Each option / proposal of the Buckingham Neighbourhood Plan will be assessed consistently using this framework:

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

Identifying and assessing alternatives for the purposes of SEA

An important element of the required SEA process involves assessing 'reasonable alternatives' in time to inform development of the draft proposals, and then publishing information on reasonable alternatives for consultation alongside the draft proposals.

As such the first part of the Environmental Report explains how work was undertaken to develop and assess a 'reasonable' range of alternative approaches for the Buckingham Neighbourhood Plan. Specifically, this includes:

1. Explaining the process of establishing the reasonable alternatives.
2. Presenting the outcomes of assessing the reasonable alternatives; and
3. Explaining reasons for developing a preferred option, considering the assessment.

The Environmental Report explores both the strategic parameters provided by the Vale of Aylesbury Local Plan, and the available growth options to establish alternatives to the preferred approach for housing development. Three growth

scenarios are established for development and taken forward for assessment. These are:

- **Scenario 1:** Western extension; this could bring forward up to **2,000 new homes**.
- **Scenario 2:** Southern extension; this could bring forward up to **3,250 new homes**.
- **Scenario 3:** Southern and western extension; this could bring forward up to **4,250 new homes**.

The three scenarios were each assessed against the SEA themes and objectives established through scoping, and the findings are presented in Chapter 4 of this Environmental Report.

Table: Reasonable alternatives assessment findings

SEA theme	Scenario 1 (west)	Scenario 2 (south)	Scenario 3 (west and south)
Accessibility (to community infrastructure)	2	2	1 (light green)
Air quality	1	3	2
Biodiversity	2	2	1
Climate change adaptation	2 (amber)	1	1
Climate change mitigation	2 (amber)	2 (amber)	1
Communities and wellbeing	1	3	2
Economy and employment	1	2	1
Historic environment	? (amber)	? (amber)	? (amber)
Homes	3 (light green)	2 (light green)	1 (green)
Landscape	1	3	2
Soils/ resources	2 (amber)	1 (amber)	3 (amber)
Transport	? (amber)	? (amber)	? (amber)
Water	=	=	=

The assessment serves to highlight Scenario 3 (higher growth) as having merit in quite a wide range of respects. This reflects a view that there are arguments for

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

Developing the preferred approach

In developing the preferred approach, the Town Council state:

“The assessment of each of the growth scenarios required validation of the assumptions that have been made to construct the scenarios. The fragmentation of infrastructure bodies and the lack of formal engagement systems to co-ordinate modelling and planning of infrastructure makes this a challenge. In some cases, for example in understanding when and where new school places and local health and green infrastructure capacity will be triggered, this has been possible. In others, notably in planning for public transport and highways investment, it has not yet been possible.

However, scenarios are often faced with imperfect information and the process of creating them can be very informative for decision making in the nearer term. As the neighbourhood plan period extends to 2040 it has been possible to identify a preferred spatial option that is consistent to every scenario and does not therefore prejudice the further planning of the town beyond 2040. This being growth in the south-west of the town (supported by urban area allocation), extending from recently committed development south of the bypass.

Importantly, the option ties in neatly with the evidence base on housing and employment land supply and with the forecast housing market absorption rate and increasing demand for commercial floorspace. And it will deliver the next era of growth in primary and secondary school place provision that will also better distribute those places across the town and it will increase access to local healthcare provision.”

Appraisal of the draft Buckingham NP

Part 2 of the Environmental Report presents an assessment of the pre-submission version Buckingham NP. Assessment findings are presented as a series of narratives under the SEA themes established through scoping. The following overall conclusions are reached:

Table 1.1: Conclusions of the draft Buckingham Neighbourhood Plan appraisal

SEA theme	Conclusion
Accessibility (to community infrastructure)	Overall, the delivery of new community infrastructure alongside contributions from new development (guided by the plan policies) to improving access to community infrastructure, is considered likely to lead to significant positive effects .
Air quality	Overall, the plan is considered to positively manage the expected future growth of the town in a way that is likely to minimise impacts

SEA theme	Conclusion
	for air quality. Broadly neutral effects are therefore concluded as most likely.
Biodiversity	The environment section of the NP, alongside the spatial strategy, perform well in respect of supporting an increase in biodiversity and minor positive effects are concluded as most likely, however, uncertainty remains until consultation with Natural England is undertaken.
Climate change adaptation	Overall, the spatial strategy is affected to some degree by flood risk and there is a reliance on policy mitigation and the development management process to reduce these risks. The policy mitigation provided by the draft NP is considered sufficient in this respect, and residual broadly neutral effects are concluded as most likely.
Climate change mitigation	Overall, the proposed policy measures are considered likely to support local priorities to increase climate resilience, and minor positive effects are concluded as most likely.
Communities and wellbeing	Overall, there are policy measures that are likely to support health and wellbeing and deliver minor positive effects , but the spatial strategy also has implications for settlement identity (contributing to coalescence) and there needs to be targeted efforts at the strategic development site to reduce the severance with the town created by the bypass. Minor negative effects are also therefore predicted.
Economy and employment	With identified opportunities for continued economic growth, alongside support for the tourism industry and protection of established educational facilities (including allowing space for these facilities to grow), significant positive effects are predicted overall.
Historic environment	Overall, whilst the spatial strategy includes development within highly sensitive heritage settings, this is largely targeted brownfield regeneration, which, supported by the introduction of the Buckingham Design Code, provides good opportunities for positive townscape enhancements. The supporting policy framework also provides wider historic environment benefits, particularly by introducing the design code, and by identifying and protecting local (non-designated) assets. On this basis, accounting for the policy mitigation provided, residual minor positive effects are concluded as most likely.
Homes	Overall, with the significant contributions to new housing, significant positive effects are considered very likely.
Landscape	Overall, the spatial strategy performs well by largely avoiding development in the most sensitive landscape areas surrounding the town (with the exception of the canal area – a rolled over allocation from the made plan – which lies within a designated Local Landscape Area) and promoting brownfield regeneration that positively affects the townscape setting. Despite this, it is recognised that most growth will be delivered through an urban extension in the south-west, resulting the loss of countryside/ greenfield land in this area. On this basis, minor negative effects are concluded as most likely.
Soil/ resources	These large sites both lie in the rural surrounds of the town, in the south-west and south. Both sites encompass agricultural land, that has the potential to be ‘best and most versatile’ (i.e., high-quality soil resources). At this scale, the cumulative loss of agricultural land is of significance, and overall significant

SEA theme	Conclusion
	negative effects are therefore predicted, whilst recognising that these effects are also largely unavoidable given the land availability situation. Most of the allocation sites also lie within a Mineral Safeguarding Area, where development will require consultation with the Minerals Authority.
Transport	Overall, the spatial strategy performs well in terms of reducing the impact of new development on the highways network, particularly within the historic core of the town, and wider plan policy measures seeks to improve sustainable transport access and active travel opportunities. Therefore, it is considered likely that significant negative effects could be avoided, and residual minor positive effects could be realised if opportunities to extend bus routes into the south-west of the town and reduce severance caused by the bypass are addressed.
Water	The NP provides policy measures support both a high water efficiency standard and ensure that the sewer network can accommodate the additional demand created by new development prior to occupation. This support for the wider actions of the Water Resources Management Plan, as well as efforts to maintain wastewater treatment capacity, mean minor positive effects are concluded as most likely as a result.

Whilst recognising there is a need to initiate consultation with Natural England and the Minerals Authority (which is recommended), the main recommendation for the Buckingham NP is to better address the need to reduce the severance caused by the A421 when developing the town beyond this bypass route. This could be through specific policy requirements for new safe walking, cycling, and wheeling crossings at the A421 in development proposals.

Next steps

Following consultation, any representations made will be considered by the Steering Group, and the Neighbourhood Plan and Environmental Report will be updated as necessary. The updated Environmental Report will then accompany the Buckingham Neighbourhood Plan for submission to the Local Planning Authority, Buckinghamshire Council, for subsequent Independent Examination.

Following submission, the plan and supporting evidence will be published for further consultation, and then subjected to Independent Examination. At Independent Examination, the Buckingham Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Local Plan.

Assuming that the examination leads to a favourable outcome, the Buckingham Neighbourhood Plan will then be subject to a referendum, organised by Buckinghamshire Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once 'made', the Buckingham Neighbourhood Plan will become part of the Development Plan for Buckinghamshire, covering the defined neighbourhood area.

The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report. This refers to the monitoring of likely significant effects of the Buckingham Neighbourhood Plan to identify any unforeseen effects early and take remedial action as appropriate.

It is anticipated that monitoring of effects of the Buckingham Neighbourhood Plan will be undertaken by Buckinghamshire Council as part of the process of preparing its Annual Monitoring Report (AMR). No significant negative effects are considered likely in the implementation of the Buckingham Neighbourhood Plan that would warrant more stringent monitoring over and above that already undertaken by the local authority.

1. Introduction

1.1 Background

- 1.1.1 AECOM is commissioned to lead on SEA in support of the emerging Buckingham Neighbourhood Plan (NP). The NP is being prepared under the Neighbourhood Planning Regulations 2012 (as amended) and in the context of the local planning framework of Buckinghamshire Council. Once 'made' the Buckingham NP will hold material weight when deciding on planning applications in the neighbourhood area (Figure 1.1), as part of the local development framework for Buckinghamshire.
- 1.1.2 SEA is a required process for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating potential negative effects and maximising potential positive effects.¹

1.2 Understanding SEA

- 1.2.1 It is a requirement that the SEA process is undertaken in-line with the Environmental Assessment of Plans and Programmes Regulations 2004. The Regulations stipulate that a report (known as the Environmental Report) must be published for consultation alongside the draft plan that "*identifies, describes, and evaluates*" the likely significant effects of implementing "*the plan, and reasonable alternatives*".² The report must then be considered when finalising the plan. More specifically, the report can be structured to address requirements by answering the following three questions:
4. What has plan-making/ SEA involved up to this point? (including in relation to 'reasonable alternatives')
 5. What are the SEA findings at this stage? (i.e., in relation to the current draft plan).
 6. What happens next?

1.3 This Environmental Report

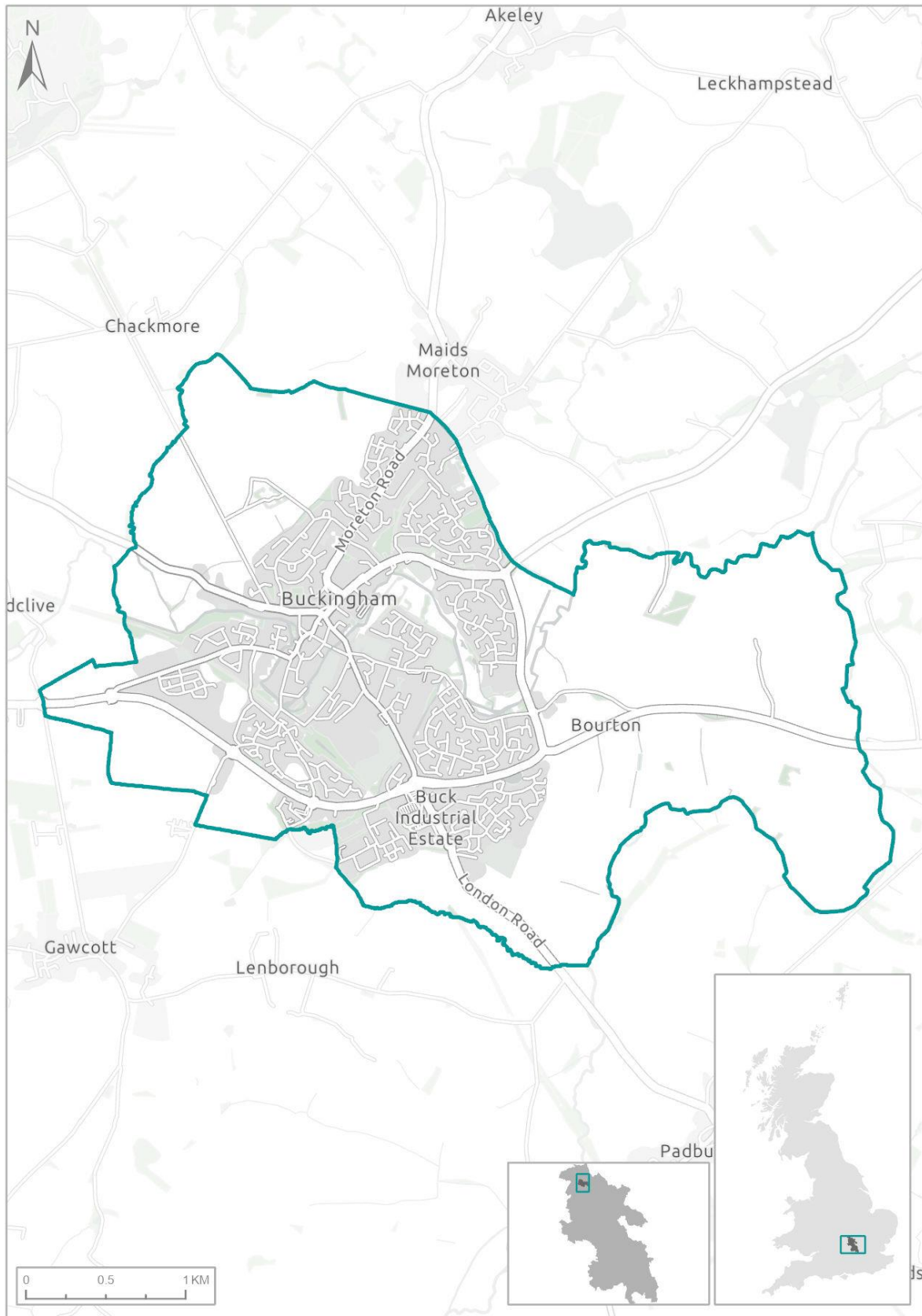
- 1.3.1 This report is the Environmental Report for the Buckingham NP. It is published alongside the 'pre-submission' version of the Plan, under Regulation 14 of the Neighbourhood Planning Regulations (2012, as amended). The report answers the three questions outlined above in turn, as discrete 'parts' of the report.³


¹ Regulation 15 of the Neighbourhood Planning Regulations (2012, as amended) requires that each Neighbourhood Plan is submitted to the Local Authority alongside either: A) an Environmental Report, or B) a statement of reasons why SEA is not required, prepared following a 'screening' process. The Buckingham NP was officially 'screened in' as requiring SEA in 2023.

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

³ See **Appendix A** for further explanation of the regulatory basis for answering certain questions within the Environmental Report, and a 'checklist' explaining more precisely the regulatory basis for presenting certain information.

Figure 1-1: Buckingham neighbourhood area



 Neighbourhood Plan Boundary

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1.4 Local Plan context

- 1.4.1 Buckinghamshire Council came into effect on the 1st April 2020 and is in the early stages of preparing a new Local Plan covering the new wider district area. To date there have been two ‘call for sites’ exercises, and a draft vision and objectives have been consulted upon.
- 1.4.2 The adopted plan still consists of the Vale of Aylesbury Local Plan 2013-2033, adopted in 2021. It recognises Buckingham as an important location for development and indicates the need for the town to accommodate 2,177 new homes over the plan period. It is anticipated this growth will enhance the town centre and its function as a market town and support sustainable economic growth.
- 1.4.3 There is also a ‘made’ Buckinghamshire Neighbourhood Plan which sets out a vision for the neighbourhood area until 2031 and allocates sites for housing development.

1.5 Vision and objectives of the NP

- 1.5.1 The following vision has been identified for the Buckingham NP:
“Make Buckingham a better place to live, work, study and play”.
- 1.5.2 To support this vision 12 objectives have been developed as follows:
1. Conserve and enhance the town’s historic environment and its setting.
 2. Provide maximum clarity about design expectations through a new Design Code building on the work of the 2001 Vision & Design Statement.
 3. Encourage development that strengthens culture, leisure, sport, and play facilities in the town.
 4. Promote measures to improve the health of people living and working in Buckingham including the provision and retention of facilities locally.
 5. Maintain the quality of Buckingham’s parkland and green space, in particular its ‘green heart’.
 6. Foster the economic development of the town and its hinterland by providing employment led growth, increasing the town’s appeal to tourists and invigorating the town centre.
 7. Help enable effective education across all tiers in Buckingham and ensure that links to and from the local economy are established.
 8. Provide a diverse housing stock to meet the needs of existing and future local people.
 9. Secure Developer Contribution from (previously stated as: “the financial uplift of”) new development for the benefit of the local community through developer contributions, New Homes Bonus and/ or Community Infrastructure Levy.
 10. Improve movement into and around the town in a healthy and safe manner; specifically cycling, walking and ease of access for the disabled.

11. Encourage a reduction in the carbon footprint of Buckingham by promoting energy efficiency and renewable energy generation.
12. Mitigate, and improve the capability of the town to deal with flooding.

1.6 Scope of the SEA

- 1.6.1 The aim here is to introduce the reader to the scope of the SEA, meaning the sustainability themes and objectives that should be a focus of the assessment of the plan and reasonable alternatives.
- 1.6.2 The SEA Regulations require 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*”. In England, the consultation bodies are the Environment Agency, Historic England, and Natural England.⁴
- 1.6.3 An SEA Scoping Report was prepared and shared with these authorities over December 2023 to January 2024. Only one response was received, from Historic England, who broadly agreed with the scope of the SEA whilst suggesting some minor amendments, which include identifying opportunities to enhance the historic environment, and consideration of heritage assets that lie outside of the Buckingham neighbourhood area where appropriate. These comments have been taken into consideration in preparing this Environmental Report for consultation.
- 1.6.4 A key output from scoping is the SEA framework, which is essentially a summary table of the scope, identifying the SEA themes and objectives that will be a focus for the SEA. The SEA framework for the Buckingham NP is provided in Table 1.1 and is formed of 13 SEA themes and objectives. The key issues that have informed the development of this framework are provided in Appendix B.

Table 1.2: Buckingham SEA framework

SEA theme	SEA objective(s)
Accessibility (to community infrastructure)	Improve access to community infrastructure for new and existing residents.
Air quality	Support objectives to improve air quality within and surrounding the neighbourhood area.
Biodiversity	Protect and enhance biodiversity and geodiversity.
Climate change adaptation	Increase the resilience of the neighbourhood area to the potential effects of climate change and protect water quality.
Climate change mitigation	Reduce the contribution to climate change made by activities within the neighbourhood area.
Communities and wellbeing	Ensure growth in the neighbourhood area protects settlement identities and the health and wellbeing of residents, and supports cohesive and inclusive communities.
Economy and employment	Ensure the long-term vitality of Buckingham Town Centre and promote continued growth in Buckingham’s employment, retail, and tourism offer.

⁴ These consultation bodies were selected “*by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes*” (SEA Directive, Article 6(3)).

SEA theme	SEA objective(s)
Historic environment	Protect, conserve, and enhance the historic environment within and surrounding the neighbourhood area.
Homes	Ensure housing growth in the neighbourhood area is aligned with the needs of all residents, improving accessibility, and anticipating future needs and specialist requirements.
Landscape	Protect and enhance the character and quality of the immediate and surrounding landscape.
Soils/ resources	Ensure the efficient and effective use of land, safeguarding key soil and mineral resources.
Transport	Promote sustainable transport use and active travel opportunities and reduce the need to travel.
Water	Use water resources in a sustainable manner and ensure sufficient sewerage network capacity ahead of development.

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

2. Introduction (to Part 1)

2.1 Overview

- 2.1.1 This section of the report provides an overview of the approach to identifying and assessing reasonable alternatives for the purposes of SEA.
- 2.1.2 Whilst work on the Buckingham NP has been underway for some time, the aim here is not to provide a comprehensive explanation of all the work carried out to date, but rather to explain work undertaken to develop and appraise reasonable alternatives at this stage.
- 2.1.3 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 Plan, namely the allocation of land for housing development, or alternative growth options.
- 2.1.4 The decision was taken to develop and assess reasonable alternatives in relation to the matter of allocating land for housing, given the following considerations:
- The Buckingham NP vision and objectives, particularly the objective to provide a diverse housing stock to meet the needs of existing and future local people.
 - Housing growth and development is known to be a matter of key interest amongst residents and other stakeholders; and
 - The delivery of new homes is most likely to have a significant effect compared to the other proposals within the Plan. National Planning Practice Guidance is clear that SEA should focus on matters likely to give rise to significant effects.
- 2.1.5 Wider thematic policies in the Buckingham NP area explored in more detail in Part 2 (What are the SEA findings at this stage) of the Environmental Report.

2.2 Structure of this part of the report

- 2.2.1 This part of the report is structured as follows:
- **Chapter 3** - explains the process of establishing reasonable alternatives.
 - **Chapter 4** - presents the outcomes of assessing reasonable alternatives; and
 - **Chapter 5** – explains the Steering Group’s reasons for selecting the preferred option, considering the appraisal.

3. Establishing alternatives

3.1 Introduction

- 3.1.1 The aim of this chapter is to explain the process that led to the establishment of alternative sites and thereby present “*an outline of the reasons for selecting the alternatives dealt with*”.⁵
- 3.1.2 Specifically, there is a need to explain the strategic parameters that have a bearing on the establishment of options (in relation to the level and distribution of growth) and the work that has been undertaken to date to examine site options (i.e., sites potentially in contention for allocation in the Buckingham NP). These parameters are then drawn together in order to arrive at ‘reasonable alternatives’.

3.2 Local Plan context

- 3.2.1 As noted in the introduction, there is a relatively recently adopted Vale of Aylesbury Local Plan (2021), but since the district and County Council’s joined to form Buckinghamshire Council in 2020, work has been underway on a new Local Plan covering the new district area. This plan is at early development stages with recent consultation on a vision and objectives for the plan and two ‘call for sites’ exercises having been completed. This plan does not at this stage identify an appropriate/ expected level of growth in Buckingham over the new plan period.
- 3.2.2 The adopted Vale of Aylesbury Local Plan identifies a growth target for Buckingham in the period up to 2033 of around 2,177 new homes. The large housing allocation sites in the west/ southwest of the town and at the canal area identified through the made neighbourhood plan (delivering a little over 600 new homes and 400 rooms for university expansion) contribute towards this figure. The adopted Local Plan allocates an additional two sites in Buckingham which combined will deliver another 650 homes, meaning alongside windfall and development completions falling within the plan period, the housing target has largely been met. However, it is recognised that the emerging plan is likely to revisit the growth target for Buckingham.

3.3 Site options

- 3.3.1 Site options have been identified using the brownfield and wider Buckinghamshire Call for Sites information (supporting the emerging Local Plan) and through the Town Council’s own assessment of other urban (brownfield) land with development potential. A total of 45 sites were identified for site options, of which four were removed as either duplicate sites or out of town sites.

3.4 Identifying options for SEA

- 3.4.1 The scale and location of the town of Buckingham means that it is very likely to remain a focus for growth in future development plans. The Town Council has used a scenario planning approach to consider how that growth may

⁵ Schedule 2(8) of the SEA Regulations

come forward. Scenario planning is a way of thinking about the long-term. Importantly, the approach does not aim to predict the future but instead looks at the different ways the town could evolve to inform a choice about which path to take.

3.4.2 On this basis, three potential scenarios have been identified as follows:

- **Scenario 1:** Western extension; this could bring forward up to **2,000 new homes**.
- **Scenario 2:** Southern extension; this could bring forward up to **3,250 new homes**.
- **Scenario 3:** Southern and western extension; this could bring forward up to **4,250 new homes**.

3.4.3 Each scenario is framed as a distinct and plausible story with an internal logic. It helps make better decisions by identifying the drivers of change and where trade-offs are likely to arise and cannot be avoided. Scenario planning enables more complex issues to be mapped and compared which is particularly useful when exploring the relationship between settlement growth and the capacity and distribution of its supporting infrastructure. It is especially helpful in larger towns like Buckingham, which needs to plan for growth by blending different growth options (low to high) with different spatial options (urban – peri/urban – extensions).

3.4.4 All identified available and suitable sites were assigned to one or more of the scenarios and it was decided that each scenario should look beyond the plan period towards 2050 (as per NPPF §22). The scenarios are built around the essence of national spatial planning policy – ‘brownfield first’, reducing car dependency, sustainable extensions, ‘town centre first’, avoiding flood risk, valued landscape protection, improving biodiversity. Other development management policies are turned off for this stage i.e. constraints are identified to illustrate the positive and adverse effects of each scenario and not to discard sites within each scenario.

4. Assessing alternatives


4.1 Methodology

4.1.1 This section presents an assessment of the three Scenarios under the SEA framework. Each assessment comprises a commentary that aims to discuss the relative merits of the Scenarios and then reach conclusions on an order of preference and significant effects. Each assessment also includes a summary table that: A) ranks the scenarios in order of preference;⁶ and B) categorises the performance of each scenario in terms of significant effects (red / amber / light green / green).⁷

4.2 Assessment findings

4.2.1 The findings are structured according with the SEA themes established through scoping.

Accessibility (to community infrastructure)

Scenario 1 West	Scenario 2 South	Scenario 3 West and south
2	2	 1 (light green)

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

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

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

4.2.5 Another consideration is links to the town centre and the town's secondary schools hub / leisure centre, and 'big box' retail along the A421 is a further consideration. In this regard, there is a concern regarding to the southeast


⁶ A star is used to highlight the scenario(s) ranked first, "=" is used where the alternatives perform broadly on a par; and "?" is used where uncertainty prevents differentiation between the scenarios.

⁷ **Red** indicates a significant negative effect; **amber** a negative effect of limited or uncertain significance; **light green** a positive effect of limited or uncertain significance; and **green** a significant positive effect. **No colour** indicates a neutral effect.

(either side of London Road), given Buckingham Industrial Estate and the recent and the Lace Hill neighbourhood, which was delivered approaching ten years ago without a focus on accommodating further expansion. Having said this, Lace Hill delivered a new primary school and community centre at the edge of the development, which could feasibly become a central component of an expanded community, and there is reasonably good walking/cycling infrastructure along the London Road linking to Buckingham Town Centre (plus good bus links to Winslow).

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

Air quality


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

- 4.2.7 Air quality itself is not a key issue locally. Monitoring of air pollutants linked to transport, specifically nitrogen dioxide (NO₂), occurs in several locations across the Buckingham neighbourhood area, but there are no recorded exceedances of the UK air pollutant annual targets.
- 4.2.8 New housing growth on the scale under consideration will lead to an increase in traffic on the roads, leading to a degree of congestion and, in turn, air pollution. In particular, particulate matter (PM) pollution a key consideration given the switchover to electric vehicles. However, there is good potential to avoid impacts through the location of homes and delivery of new/upgraded infrastructure.
- 4.2.9 A key issue is the need to avoid traffic through the historic town centre, where there is a risk of problematic congestion and air quality, plus generally a poor-quality local environment due to heavy traffic. In this regard, there is a particular case for supporting growth to the west of Buckingham (Scenario 1), in order to deliver a link road between the A421 and the A422, which would complete a bypass of the town for those travelling between Brackley and Milton Keynes / Winslow. Growth to the south could also deliver a new link road (subject to landowner collaboration), but the strategic case for this is less immediately apparent (although see discussion below under ‘Communities’). A final consideration is whether some car trips between growth locations to the west of the town and Milton Keynes (a key

destination) would choose to route through the town centre even with a new link road.

- 4.2.10 With regards to Scenario 3 (west and south), there is considerable uncertainty. On the one hand, traffic congestion through the town centre is a significant issue such that there is a case for seeking to restrict growth at Buckingham. However, on the other hand, planning for comprehensive growth (i.e. avoiding piecemeal growth over time) would help to secure investment in / strategic planning for infrastructure, including transport infrastructure (both road infrastructure, including in support of public transport, and active travel infrastructure) and community infrastructure (thereby reducing the need to travel and enabling more trips to be made by walking and cycling, i.e. active travel).
- 4.2.11 In **conclusion**, there is a clear case for Scenario 1 with a focus on reducing town centre traffic congestion, and there is also tentative support for Scenario 3. Neutral effects are predicted under all the scenarios, as that whilst transport / traffic is a key issue locally, air quality is not a major issue.

Biodiversity

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

- 4.2.12 A first point to make is that, whilst none of the three scenarios will bring forward growth within proximity to European or nationally designated site, the proposed levels of growth will require consultation with Natural England due to an overlap with Sites of Special Scientific Interest (SSSI) Impact Risk Zones.
- 4.2.13 The next matter for consideration is then locally designated Local Wildlife Sites (LWS); however, data is not currently available to show the location of LWSs. There is also one Local Nature Reserve (LNR) in Buckingham, but it is designated primarily for geodiversity, and is distant from the growth options.
- 4.2.14 The next matter for consideration is priority habitat, which is not a formal designation, but is mapped nationally (see magic.gov.uk). Buckingham's primary concentration of priority habitat is associated with the former railway line to Brackley, and this is a constraint to growth to the west of Buckingham, particularly when taken into account alongside the adjacent corridor of the River Great Ouse. There is little or no priority habitat along the river corridor, but it is nonetheless clearly has biodiversity value. However, there would be good potential to avoid any issues and also realise opportunities (in respect of habitat creation and enhancement) assuming a comprehensively masterplanned scheme.
- 4.2.15 A final area of sensitivity is found to the southwest of Buckingham Industrial Estate / south of Swan Business Park and Aldi. The nationally available dataset shows limited priority habitat here, but there is extensive mature vegetation associated with the Buckingham Brook corridor, which is shown on historic satellite imagery (WWII aerial photography is available from

Google Earth). There are further areas of mature trees, including three linked copses, but this is recent planting (c.2006).

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

Figure 4.1: Masterplan (2021) for the permitted Land off Osier Way scheme



4.2.16 Three final considerations are:

- The spring that rise to the south of Buckingham Industrial Estate and forms a stream that flows south to meet the Padbury Brook, along which there is some bankside vegetation (noting that this area of potential sensitivity links closely to the aforementioned area the SW of the industrial estate.
- The Padbury Brook to the SE of Buckingham, along which there is extensive priority habitat. Any further expansion of the town to the SE must not encroach unduly on the brook corridor, and there is a need for long-term strategic planning for the corridor at a landscape scale.
- Historic field boundaries, particularly with a focus on those shown on the oldest historic Ordnance Survey maps (see [maps.nls.uk/](#)). Field

boundaries mostly show a geometric pattern indicative of 17th and 18th century enclosure, but satellite imagery shows some variation in terms of the strength of field boundaries, e.g. field boundaries appear weaker to the SE than is the case to the SW.

- 4.2.17 In light of the discussion above, there is support for Scenario 3, which would likely give rise to greater opportunity to deliver greenspace within the site boundaries and would also generate funds (over-and-above the lower growth scenarios) that might be directed towards realising biodiversity and associated ecosystem service opportunities. This conclusion is reached accounting sensitivities overall are quite limited in the sub-regional context (i.e. it is not possible to simply conclude that lower growth is preferable in biodiversity terms, as the effect could be to increase pressure for growth elsewhere).
- 4.2.18 Conversely, Scenario 1 could lead to pressure on the (somewhat) sensitive River Great Ouse corridor, whilst Scenario 2 could lead to pressure on the Buckingham Brook Corridor southwest and/or the unnamed stream corridor to the south, and there could also be a concern regarding expansion of the town encroaching on the Padbury Brook corridor.
- 4.2.19 In **conclusion**, there is tentative support for Scenario 3, and Scenarios 1 and 2 are judged to perform broadly on a par. There are no concerns regarding significant negative effects, and it could be that Scenario 3 delivers benefits of note, but there is little certainty at this early stage.

Climate change adaptation

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

- 4.2.20 A key climate change adaption consideration is flood risk, and this is a particular issue for Buckingham, given the town's close association with the River Great Ouse.
- 4.2.21 Growth to the west of the town (Scenarios 1 and 3) does give rise to concerns given the river corridor. It is fair to assume that development would avoid the flood risk zone, and that the flood risk zone would be defined accounting for climate change, but there is a need to consider the size of the undeveloped buffer between development and the flood risk zone, including given inherent uncertainties associated with modelling the impacts of climate change on rainfall, storminess etc. Also, there is a need to consider the effect of infrastructure associated with housing growth on the flow of water and water storage within the floodplain, particularly new road infrastructure.
- 4.2.22 In this light, there is support for Scenario 3 over Scenario 1, as there would be increased potential to maintain a generous greenspace buffer between built form and the flood risk zone. Also, the scale of growth under Scenario 3 could increase the chances of funding being made available to deliver enhancements to the baseline situation, in terms of flood storage / attenuation, feasibly resulting in a flood risk betterment, noting existing flood risk affecting the town centre downstream.

- 4.2.23 With regards to Scenario 2, there are few concerns in respect of flood risk. Two stream corridors pass through this area, as discussed above (under Biodiversity), but there would be excellent potential for a comprehensively masterplanned scheme to accommodate these as part of the green infrastructure.
- 4.2.24 In **conclusion**, it is fair to flag a potentially significant concern with Scenario 1. However, there is likely to be a solution following detailed work on masterplanning, Sustainable Urban Drainage Systems (SuDS) and potentially new strategic flood storage.

Climate change mitigation

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

- 4.2.25 A primary focus here can be on the matter of built environment decarbonisation, recognising the potential to consider carbon / greenhouse gas emissions from transport below. Transport emissions are the primary climate change mitigation consideration here, but there is also a need to ensure early consideration of built environment decarbonisation issues and opportunities.
- 4.2.26 A key consideration is that growth at scale can benefit from stronger development viability than smaller scale growth (all other things being equal, and particularly assuming that growth at scale does not trigger the need for new costly infrastructure, e.g. road infrastructure or wastewater treatment). In turn, this can mean that growth at scale leads to additional opportunity to deliver net zero development (or development that otherwise achieves decarbonisation standards that go beyond the minimum standards set out in Building Regulations). However, there is much uncertainty ahead of further work, including evidence that the landowners would be willing to collaborate on a comprehensive scheme that is greater than the sum of its parts. To date a detailed vision document has been made available only for a ~800 home scheme to the southwest (see Figure 4.2, noting that it also shows the aforementioned committed Osier Way scheme, adjacent to the east), and this does not include any discussion of net zero development or otherwise taking an ambitious approach to decarbonisation.
- 4.2.27 In this light, there is support for Scenario 3. Also, it is fair to highlight that Buckingham has strong development viability in the sub-regional context, which serves to suggest that Buckingham is quite well suited to a higher growth strategy, from a perspective of wishing to deliver net zero development. However, on the other hand, it is understood that there may be some challenges locally in terms of capacity of the electricity grid (a key issue assuming reliance on heat pumps; also EV charging).
- 4.2.28 With regards to differentiating between Scenarios 1 and 2, on the one hand Scenario 2 would involve a larger scheme; however, on the other hand, it would need to deliver significant new road infrastructure that would require collaboration between several landowners, which could create

viability/delivery challenges, which ultimately impact on the decarbonisation ambition. This has recently been the experience at Bicester, where North West Bicester Ecotown (as allocated in 2015) has recently been rebranded simply as North West Bicester, and the decision has been taken to support an additional 1,000 homes to assist with delivery (see the Draft Cherwell Local Plan, 2023).

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

Figure 4.2: Site promoter masterplan (December 2023) for a potential scheme to the southwest of Buckingham



Communities and wellbeing

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

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

- 4.2.31 There are many issues that could potentially be discussed, but there is a need to focus attention on those that could potentially allow for differentiating between the current high-level scenarios.
- 4.2.32 Perhaps the primary issue is around reducing the severance created by the current A421, which is important from a health and safety perspective (including in respect of school children), plus there is generally a need to ensure that new communities to the south of the town are well-integrated with the long-established communities to the north. In turn, there are implications for the issue of ensuring that Buckingham maintains its identity as a historic market town, whilst at the same time taking on a greater role as a home for commuters to Milton Keynes, Silverstone and other key employment hubs.
- 4.2.33 In light of these points, there is support for Scenario 2, which would deliver a new link road to the south of the town. However, there is uncertainty regarding the extent to which it would be used as an alternative to the A421 and, in turn, reduce the severance effect. Also, if the new road itself could create a severance effect if it is the case that there are new communities to the south of it.
- 4.2.34 In turn, a related key issue is around comprehensive planning and avoiding the risk of long term 'sprawl'. In this regard there are concerns around further expansion to the south and southeast, given the river valley topography (whilst, in contrast, further expansion to the southwest could be relatively well contained by rising topography towards Gawcott). Linked to this, there are also concerns regarding effectively integrating further expansion to the southeast given Buckingham Industrial Park and the recent Lace Hills development, as discussed above.
- 4.2.35 In **conclusion**, there is support for Scenario 1 as new communities to the west would relate quite well to the existing settlement edge and the town centre, whilst there are some concerns with regards to further expansion of the town to the south and the southeast. However, the significance of concerns is not clear at this stage, ahead of further work to explore masterplanning options.
- 4.2.36 The figures below aim to support the above discussion. Both are taken from a current pending planning application for 300 homes plus employment land to the south of Buckingham Industrial Park / west of London Road. The first serves to highlight that land to the west of Buckingham would relate relatively well to the historic town centre, although here are some services and amenities in the southern part of the town. The second serves to illustrate that the existing Industrial Park would represent a significant barrier to movement for any new community to the south.

Figure 4.3: Services and facilities in central and southern Buckingham (from application 23/00178/AOP)

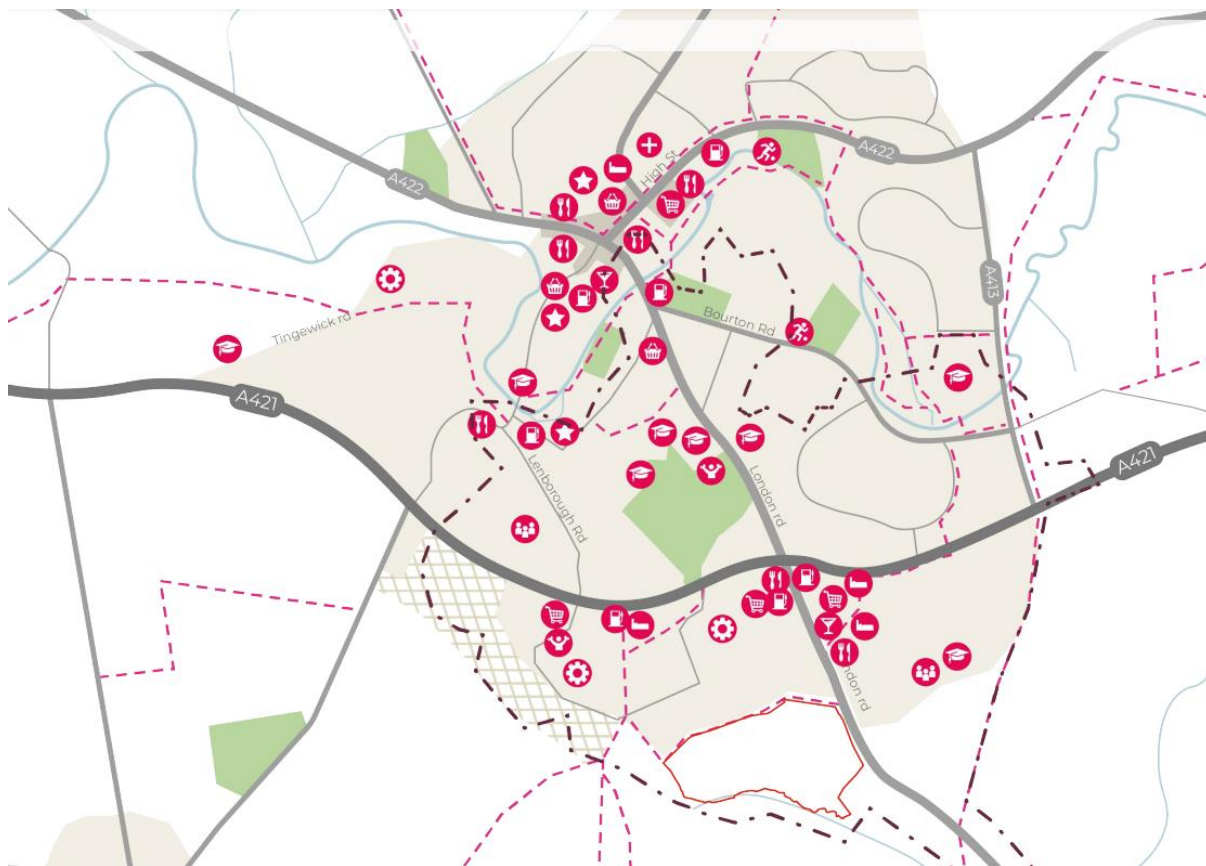


Figure 4.4: Proposed masterplan for a 300 home residential led scheme (application 23/00178/AOP)



Economy and employment

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

- 4.2.37 A primary consideration here is the existing employment land allocation for a 10ha expansion of Buckingham Industrial Park, which would alternatively be delivered as housing / a housing-led scheme under Scenarios 2 and 3. Buckingham is an important location for manufacturing and precision engineering, given links to both Silverstone and Milton Keynes. However, on the other hand, there is a need to provide for high quality homes, including family homes, in order to support a skilled workforce that enables this nationally important employment cluster to thrive and grow, including capitalizing on links to both Oxford (and the wider Oxford Knowledge Spine) and Cambridge.
- 4.2.38 It is also recognised that no planning application has been submitted for the employment site, despite having been allocated for nine years, and that there is currently a pending planning application for an residential-led scheme involving 300 homes (ref. [23/00178/AOP](#)). The planning application includes an 'Employment Land Statement' (2022) which states that there has been no market interest in the site (for the allocated employment uses), concluding that this is because potential occupiers of large scale industrial sites, such as the site in question, would prefer to locate at Milton Keynes or Northampton, with the demand at Buckingham more for small scale industrial sites.
- 4.2.39 In **conclusion**, it is fair to flag a concern with Scenario 2, as there would be limited or no potential to deliver new employment land adjacent to Buckingham Industrial Park, albeit the analysis regarding lack of market demand for large-scale new employment land here is noted. Conversely, under Scenario 3 there could be flexibility to deliver new employment land (perhaps on a smaller scale than envisaged by the Neighbourhood Plan allocation), plus there is generally support for housing growth and new road infrastructure in a broad area that is nationally significant in terms its economic offer.

Historic environment

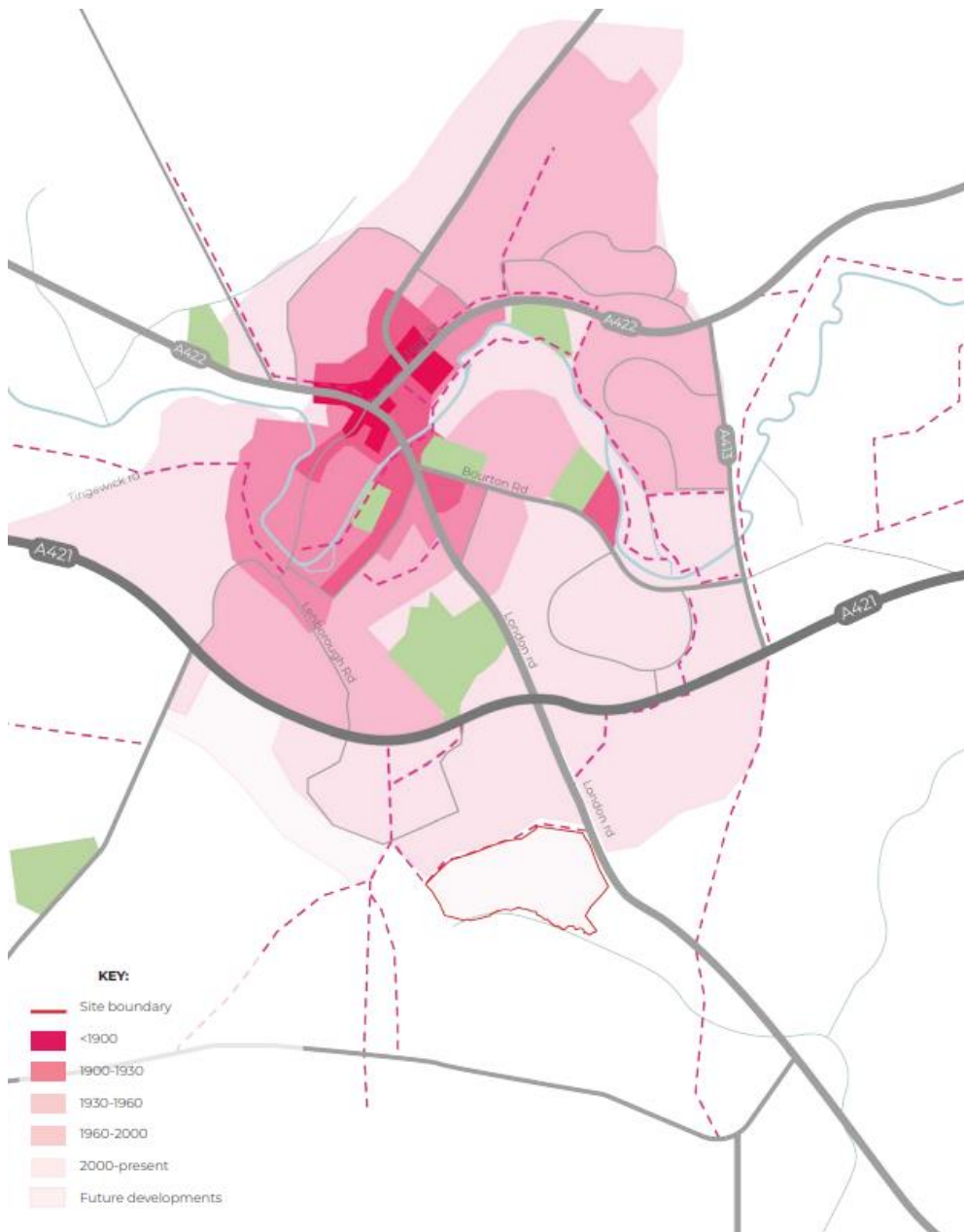
Scenario 1 West	Scenario 2 South	Scenario 3 West and south
? (amber)	? (amber)	? (amber)

- 4.2.40 All of the potential growth locations are quite remote from nationally designated assets and the town centre conservation area, with the land in question historically being a rural farmed landscape. However, the historic environment is nonetheless a key issue for this assessment of growth scenarios, given the larger-than-local significance of the town centre in

historic environment terms, including on accounts of its links to the renowned landscaped parklands of Stowe to the north.

- 4.2.41 As discussed above, expansion to the west would involve new homes and infrastructure in relatively close proximity to the town centre; however, historic environment concerns are still limited. There would presumably be some increase in traffic along the Brackley Road, which links to Stowe Registered Park and Garden (specifically the Grand Avenue) and the town centre conservation area (also a Victorian Cemetery and some other historic built form to the west of the town centre), but this would be limited on the assumption of a new link road to the south (as discussed). There would be impacts to the river corridor landscape, but it is difficult to conclude this is a historic environment issue.
- 4.2.42 Finally, in respect of Scenario 1, there is a need to consider the matter of maintaining a landscape gap to Radclive, which is a hamlet with a clear historic character, including a Grade I listed parish church, and as reflected in a designated conservation area. Maintaining a strong landscape gap is considered to be an important objective, from a historic environment perspective. However, on the other hand, it could be that expansion to the west (Scenarios 1 and 3) delivers a new link road that serves to address the existing issue of rat running through the centre of the hamlet. Also, the possibility of a new public footpath link that takes walkers (and perhaps also cyclists) through the historic core of the hamlet, as part of a walk that ultimately leads to Tingewick, might be envisaged.
- 4.2.43 With regards to expansion to the south, there are a range of landscape concerns that have a historic environment 'dimension', but there is overall limited historic environment constraint. Rising topography would clearly allow for maintenance of a large landscape gap to Gawcott; whilst development would encroach upon several historic farmsteads none are known to have particular heritage value; the bridleway that passes south from Buckingham Industrial Park is shown on historic maps as a footpath, as opposed to a lane that might have historic character; the shallow valleys / river and stream corridors in this area are not likely to be particularly appreciated or valued from a historic environment perspective; and the field boundaries in this area likely date from enclosure (as discussed). On point to note is that the Bernwood Jubilee Way, which currently bounds the southern extent of the recent Lace Hill development, does appear to follow the route of a historic lane, at least in part.
- 4.2.44 In conclusion**, it is very difficult to differentiate the alternatives with confidence. On the one hand there are arguments for comprehensive growth, including because it would allow for greater use of greenspace / green infrastructure to minimise historic environment concerns, e.g. there could well be added potential for a larger landscape buffer to Radclive (assuming that landowners work in collaboration, i.e. there is effective land equalisation). However, on the other hand, Buckingham is inherently sensitive in historic environment terms, such that there is a clear case for restricting growth. On balance uncertain effects must be concluded at this stage, ahead of consultation with Historic England (N.B. it is noted that Historic England did not respond to the SEA Scoping consultation).

Figure 4.5 Age of built form serving to highlight the traffic challenge (from 23/00178/AOP)



Homes


Scenario 1 West	Scenario 2 South	Scenario 3 West and south
3 (light green)	2 (light green)	★ 1 (green)

4.2.45 There is currently little certainty regarding the number of homes that are needed locally. Some clarity may be gained through ongoing work on a Housing Need Assessment (HNA), but HNA at the scale of individual towns such as Buckingham is more able to reach conclusions on the required housing mix, and number of specific types of homes required (affordable housing and specialist housing) than on the overall need for housing (i.e. to

include market housing). Overall housing need will be determined for Buckinghamshire Council – whether using the Government’s standard method, which indicates a need for ~3,000 homes per annum, or an alternative method (see NPPF paragraph 61) – and then it will be the role of the Buckinghamshire Local Plan to consider strategy and supply options before determining how many homes are required at Buckingham (see NPPF paragraph 67).

- 4.2.46 However, it is plainly the case that the number of homes needed to meet locally arising needs is significant, plus there is a need to consider the role of Buckingham in terms of providing homes to meet the needs of those who commute to work elsewhere in a nationally important sub-region. Also, there is a need to recognise that the locally arising need for affordable housing (i.e. housing available for below market price for those who qualify) is invariably more than can be delivered (by market-led developments that typically deliver affordable housing at a rate of perhaps 35-40%) and so there is invariably an ‘affordable housing’ argument for maximizing housing growth.
- 4.2.47 In **conclusion**, it is appropriate to rank the alternatives in order of total growth quantum, albeit under the highest growth scenario (at least) it could be the case that the number of homes delivered would be in excess of what is needed in order to provide for ‘locally arising’ housing needs. Ahead of the Buckinghamshire Local Plan determining the number of homes required all of the scenarios reflect a proactive approach to housing growth (recalling that there would also be housing growth within the urban area under all scenarios, plus likely some housing growth to the east of the town in the vicinity of the canal) and it is fair to say that Scenario 3 would represent a highly proactive approach.

Landscape

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

- 4.2.48 All of the potential growth scenarios would involve directing growth away from the most sensitive landscapes, namely rising land towards Stowe to the north of the town, and the river valley / canal corridor landscape to the east of the town (as appreciated from the A422 and the Ouse Valley Walk).
- 4.2.49 However, there are clear landscape sensitivities. Beginning with option of expansion to the west of the town, there is a clear landscape concern associated with development along the river corridor, and the key matter of maintaining a landscape gap to Radclive has already been discussed (although there could also be a degree of opportunity, in terms of a potential new walking / cycling link). Final points to note regarding the option of expansion to the west are:
- The field boundaries associated with the river corridor are likely to be of considerable value.
 - The Bernwood Jubilee Way passes through this area, but it is not clear the extent to which it allows for an appreciation of the river valley / corridor

landscape. The former disused railway line is not used as a footpath, which could represent an opportunity to explore.

- There would be little or no risk of future 'sprawl', and there is generally a landscape argument for containing the expansion of Buckingham within the valley of the River Great Ouse.

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

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

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

Soils/ resources

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

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

4.2.54 What the data at magic.gov.uk shows is that agricultural land quality is a significant constraint to growth locally. The low-resolution national dataset shows all of the land in question to be of 'grade 3 quality'; however, much

detailed surveying work has been undertaken, which shows quite extensive land of grade 3a and also grade 2. It appears likely that land to the southeast comprises lower quality agricultural land (grade 3b), but it is difficult to be certain.

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

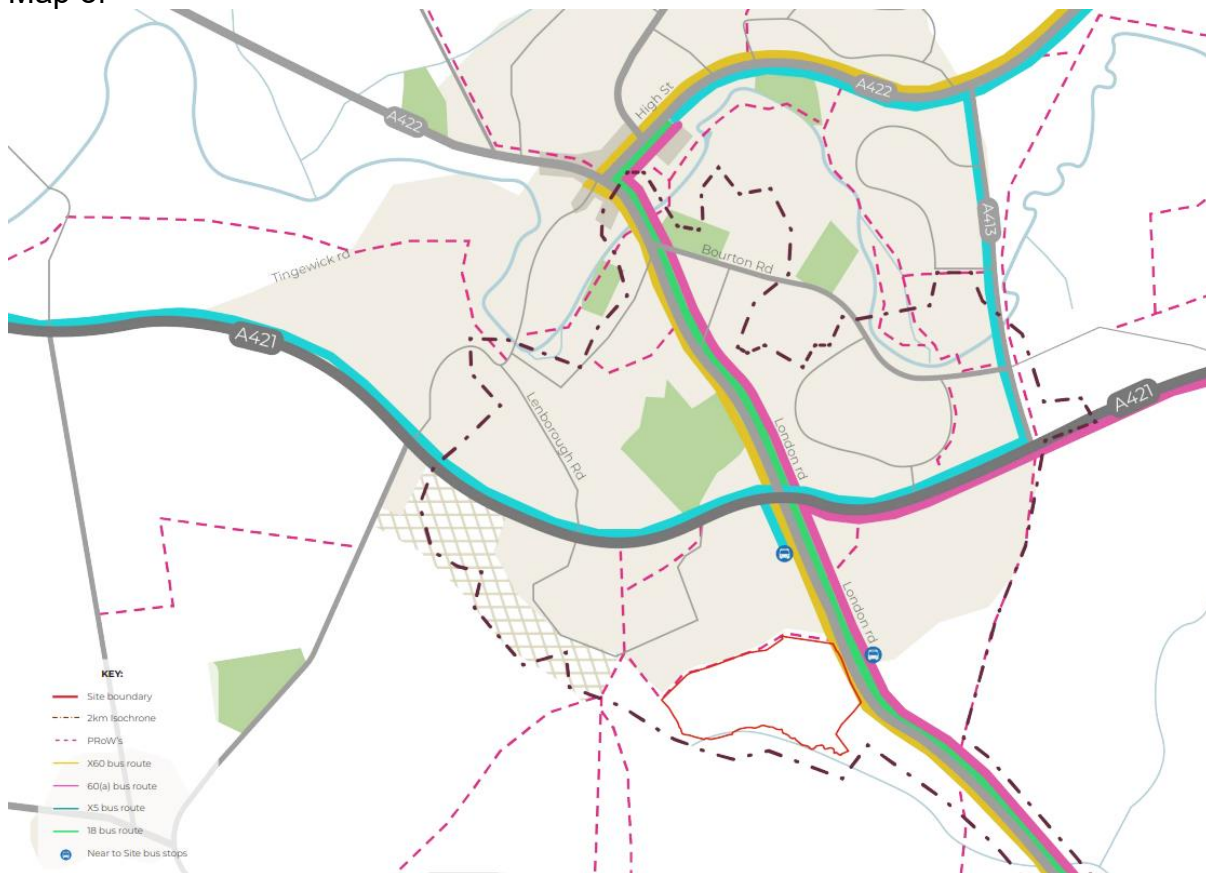
Transport

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

- 4.2.56 Transport is a key issue for the current assessment, although most of the specific issues and opportunities have already been discussed above. There is a clear strategic case for a new link road to the west of the town, and there may also be a strategic case for a new link road to the south of the town, although this is less readily apparent. With regards to minimising the need to travel and supporting modal shift away from the private car towards active and public transport, the option of further expansion to the south and southeast is problematic in terms of achieving good links to Buckingham town centre; however, on the other hand, the land here does benefit from good links to Winslow (East West Rail station) and Milton Keynes. There is also a need to question the deliverability of a new road link to the south of the town that passes across several land ownerships.
- 4.2.57 More broadly, in respect of the merits of a new link road to the south of the town, there is a need to question whether this new road infrastructure would align with the national and local move away from a 'predict and provide' approach to transport planning and towards a new 'decide and provide' approach. A very recent report by Create Streets and Sustrans highlights the possibility of supporting higher density 'vision-led' development that avoids the need for new road infrastructure, with funding alternatively directed towards measures aimed at minimising the need to travel and modal shift away from the private car; see <https://www.createstreets.com/projects/stepping-off-the-road-to-nowhere/>.
- 4.2.58 In conclusion, this is such a key issue that it would not be appropriate to draw conclusions at this stage, ahead of further work. There is a need to consider the potential for higher density development, opportunities to deliver new community infrastructure, new walking and cycling links, bus services to Winslow, objectives for upgrading the A421 corridor to Milton Keynes and minimising (even reducing) traffic through the historic town centre. It is appropriate to flag a risk of negative effects at this stage, taking a precautionary approach, recalling that Buckingham does not benefit from a train station and given existing issues of traffic through the town centre.

Figure 4.6: Bus routes locally (from 23/00178/AOP; N.B. bus stops shown are not comprehensive)

Map of



Water

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

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

- Water resources – this is not likely to be a key issue for Buckingham but is more of a consideration in the south of the County, given chalk streams fed by groundwater.
- Wastewater collection – delivering new sewer infrastructure is rarely a significant constraint to growth, but it can be an issue in some areas, e.g. new settlements in notably rural areas. It is unlikely to be an issue with a significant bearing on the current assessment (subject to further discussions with the water company).
- Wastewater treatment – this is often a key issue for local plans and is high on the agenda nationally and locally. There are not known to be any particular issues locally, in contrast to the south of the County, where a number of areas are notably constrained in terms of wastewater treatment. In 2022, the storm overflow at Buckingham Water Recycling

Centre / Wastewater Treatment Works spilled 26 times for a total of 241 hours, as shown at: theriverstrust.org/sewage-map). However, it could well be that there is capacity to upgrade the works. Also, the possibility of delivering a new works under a high growth scenario should not be entirely discounted, e.g. this is anticipated at a garden village for 5,000 homes (along with associated new wetland habitats) allocated within the Maidstone Local Plan (see para 112 of the Inspectors Report, March 2024).

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

4.4 Assessment conclusions

4.3.1 Table 3.1 presents an overview of the assessment, followed by conclusions and next steps.

Table 1.1: Summary assessment of the three alternative high-level growth scenarios⁸

SEA theme	Scenario 1 (west)	Scenario 2 (south)	Scenario 3 (west and south)
Accessibility (to community infrastructure)	2	2	★ 1 (light green)
Air quality	★ 1	3	2
Biodiversity	2	2	★ 1
Climate change adaptation	2 (amber)	★ 1	★ 1
Climate change mitigation	2 (amber)	2 (amber)	★ 1
Communities and wellbeing	★ 1	3	2
Economy and employment	★ 1	2	★ 1
Historic environment	? (amber)	? (amber)	? (amber)
Homes	3 (light green)	2 (light green)	★ 1 (green)
Landscape	★ 1	3	2
Soils/ resources	2 (amber)	★ 1 (amber)	3 (amber)
Transport	? (amber)	? (amber)	? (amber)
Water	=	=	=

4.3.2 The assessment serves to highlight Scenario 3 (higher growth) as having merit in quite a wide range of respects. This reflects a view that there are arguments for planning strategically for comprehensive growth rather than risking piecemeal growth over time with commensurate opportunities missed in respect of securing investment in infrastructure and wider ‘planning gain’.

⁸ To reiterate, within each row, the aim is to 1) rank the scenarios in order of performance (with a star indicating best performing, “=” used where the alternatives perform broadly on a par; and “?” used where uncertainty prevents differentiation); and then 2) categorise performance in terms of ‘significant effects’ using red / amber / light green / green.

However, Scenario 3 also has drawbacks, and it is important to note that the topics are not weighted in any way. In particular, further work could well serve to highlight concerns with higher growth in respect of transport and/or historic environment objectives, the decision might be made that these objectives should be assigned particular weight (potentially alongside objectives around landscape and agricultural land) and, having done so, the conclusion might be reached that there is a need to support a lower growth scenario.

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

5. Developing the preferred approach

5.1.1 In developing the preferred approach the Town Council state:

“The assessment of each of the growth scenarios required validation of the assumptions that have been made to construct the scenarios. The fragmentation of infrastructure bodies and the lack of formal engagement systems to co-ordinate modelling and planning of infrastructure makes this a challenge. In some cases, for example in understanding when and where new school places and local health and green infrastructure capacity will be triggered, this has been possible. In others, notably in planning for public transport and highways investment, it has not yet been possible.

However, scenarios are often faced with imperfect information and the process of creating them can be very informative for decision making in the nearer term. As the neighbourhood plan period extends to 2040 it has been possible to identify a preferred spatial option that is consistent to every scenario and does not therefore prejudice the further planning of the town beyond 2040. This being growth in the south-west of the town (supported by urban area allocation), extending from recently committed development south of the bypass.

Importantly, the option ties in neatly with the evidence base on housing and employment land supply and with the forecast housing market absorption rate and increasing demand for commercial floorspace. And it will deliver the next era of growth in primary and secondary school place provision that will also better distribute those places across the town and it will increase access to local healthcare provision.”

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

6. Introduction (to Part 2)

6.1 Overview

6.1.1 The aim of Part 2 is to present appraisal findings and recommendations in relation to the draft plan. This part of the report presents:

- An overview of the plan contents, aims, and objectives.
- An appraisal of the plan under thirteen different SEA theme headings.
- Consideration of cumulative effects; and
- The overall conclusions at this stage.

6.2 Methodology

6.2.1 The assessment identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability objectives identified through scoping as a methodological framework.

6.2.2 Every effort is made to predict effects accurately; however, this is inherently challenging given the strategic nature of the policies under consideration and understanding of the baseline (now and in the future under a 'no plan' scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g., in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim of striking a balance between comprehensiveness and conciseness). In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is possible to comment on merits (or otherwise) of the draft plan in more general terms.

6.2.3 Finally, it is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations. So, for example, account is taken of the probability, duration, frequency, and reversibility of effects as far as possible. Cumulative effects are also considered, i.e., the potential for the Neighbourhood Plan to impact an aspect of the baseline when implemented alongside other plans, programmes, and projects. These effect 'characteristics' are described within the assessment as appropriate.

6.3 Buckingham NP policies

6.3.1 The Buckingham NP proposes 24 policies to guide future development in the neighbourhood area, the policies are listed in Table 6.1.

Table 6.1: Buckingham NP policies

Policy reference	Policy name
HP1	A spatial strategy for the town
HP2	Urban area allocations
HP3	Land to the South West of Buckingham
HP4	Development phasing and contributions
HP5	Housing mix and tenure
DH1	The Buckingham Design Code
DH2	Local Heritage Assets
DH3	Retrofitting in the Conservation Area
DH4	Addressing the Performance Gap
ENV1	Buckingham Green Ring
ENV2	Green and blue infrastructure
ENV3	Urban greening
ENV4	Private outdoor space
ENV5	Local green spaces
CLH1	Active and sustainable travel
CLH2	Development of the canal area
CLH3	Health facilities
CLH4	Art, cultural, sport, and recreation facilities
EE1	Buckingham Town Centre
EE2	Employment
EE3	University of Buckingham
EE4	Primary and secondary school provision
I1	Water management and flood risk
I2	Digital infrastructure

7. Appraisal of the draft Buckingham NP

7.1 Plan overview

- 7.1.1 The Buckingham NP is structured around the six key themes of: housing; design and heritage; environment; culture, leisure, and health; economy and education; and infrastructure.
- 7.1.2 With regards to housing, the plan promotes development at urban locations, particularly at brownfield opportunity sites (of which nine are identified) and allocates a single, large-scale development site at the settlement edge, to the south-west of Buckingham (Policies HP2 and HP3). The large site is expected to deliver around 800 new homes, a new two form entry primary school, a local centre comprising workspace and retail uses, and new open space.
- 7.1.3 The site allocations contribute to an overall spatial strategy for the town that is defined under Policy HP1, delivering 1,200 new homes in total and 10 hectares of employment land. Policy HP1 further identifies a settlement boundary that encompasses the allocation sites as well as development sites that have been recently committed or completed. Future development is therefore expected to be predominantly within this defined settlement area. The allocations are also supported by policy guidance around development phasing and contributions, with Policy HP4 clearly identifying local priorities for improved community facilities/ infrastructure and improved access to sustainable travel opportunities. Policy HP5 also identifies the preferred housing mix and tenures that would contribute best to meeting local needs.
- 7.1.4 The plan dedicates a section to design and heritage that introduces a Design Code for Buckingham and identifies and protects local heritage assets. The policies in this section seek to integrate high-quality design and performance aspects in development, including energy efficiency improvements in sensitive historic areas, such as within the Buckingham Conservation Area.
- 7.1.5 An environment section complements the existing suite of planning policies (at the national and local plan level) by introducing a 'Green Ring' around the town comprising a variety of green infrastructure and biodiversity assets, as well as by pursuing greater levels of urban greening, and enhancing the policy protections for green and blue infrastructure, including by designating Local Green Spaces.
- 7.1.6 Four policies are introduced which collectively seek to protect and enhance the leisure and cultural offer of the town, and promote resident health and wellbeing, including through active travel opportunities. Whilst another four policies dedicated to economy and employment seek to protect and enhance Buckingham Town Centre, deliver 10ha of new employment land west of London Road (close to Buckingham Industrial Estate), and safeguard dedicated space for educational purposes, including at the University of Buckingham. Finally, two infrastructure policies seek to manage flood risk and improve digital connectivity.

7.2 Accessibility (to community infrastructure)

- 7.2.1 A key issue in relation to accessibility is minimising pressure on existing community infrastructure locally. In this respect, the plan performs well by directing most of the housing development needs (around two thirds) to the single strategic allocation site (Policy HP3) which seeks to deliver a new two-form entry primary school as well as a new local centre comprising workspace and retail. This should contribute significantly to improving access to key community infrastructure in the south-west of the town, whilst also considering that this area is relatively close to key existing facilities such as the secondary school, university, and supermarkets.
- 7.2.2 The remainder of the housing development is directed to within the existing urban area, largely at brownfield opportunity sites. For these and any other urban development sites that may come forward, Policy HP4 outlines the local priorities for development contributions. These priorities focus on expanding healthcare provision at Lace Hill, expanding secondary school provision, delivering a new community centre that includes a theatre stage, improving sustainable transport access and active travel opportunities, and expanding sports provision and improving existing green and open spaces. Some of these brownfield sites, and site allocations rolled over from the made plan are of medium-scale that could meaningfully contribute to achieving these priorities (for example, there are three sites each delivering near 100 homes). The spatial strategy is therefore considered to perform positively in relation to this SEA theme.
- 7.2.3 Additional employment development to the south of the town (Policy EE2), expanding upon Buckingham Industrial Estate, will also support the growing population with local access to employment opportunities. Positive effects are also anticipated through the wider plan policies, particularly the policies which seek to improve access to sustainable transport and active travel opportunities (Policy CLH1) and to green and blue infrastructure, including by designating and protecting Local Green Spaces (ENV5), and introducing a 'Green Ring' around the town (Policy ENV1).
- 7.2.4 Overall, the delivery of new community infrastructure alongside contributions from new development (guided by the plan policies) to improving access to community infrastructure, is considered likely to lead to **significant positive effects**.

7.3 Air quality

- 7.3.1 Whilst recognising that air quality is not a significant issue locally, with monitoring of air pollutants occurring in several locations across the neighbourhood area, but no recorded exceedances of the UK air pollutant annual targets, it is recognised that large-scale growth has the potential to impact the baseline. Importantly, given the role of Buckingham in the settlement hierarchy and as a market town serving a wider population, a strategic level of growth is anticipated within the wider policy framework (of the local plan), effectively meaning this level of growth is likely to occur with or without the neighbourhood plan.
- 7.3.2 The neighbourhood plan policies suggest certain measures that new development should take to minimise its impact on local air quality and are

beneficial in this respect. The spatial strategy directs most housing development to an accessible strategic site at the settlement edge, supported by growth within the urban area (optimising the use of brownfield land). Employment development is focused south of the existing Buckingham Industrial Estate where there are established route connections, including bus services off London Road. The plan policies further include stipulations for the highways scheme supporting the strategic allocation site (Policy HP3), and an active travel strategy accompanying development of the canal area (Policy CLH2). Furthermore, Policy HP4 identifies that two of the priorities for development contributions and Section 106 funding relate to improving town centre and public transport access, and active travel opportunities, and Policy CLH1 defines a sustainable transport network across the town that would be sustained and enhanced.

- 7.3.3 A key congestion pinch-point is recognised at the historic town centre and the plan policies seek to counteract this by, as aforementioned, improving sustainable transport access to the town centre (particularly walking routes), and by directing most growth to a large site adjacent to the A421 bypass. This location lies close to the main employment areas and supermarkets and provides an alternative route to travelling through the centre to access other areas of the town, including the secondary school and university, and recreational areas such as Bourton Park. Indirect benefits for air quality are therefore expected.
- 7.3.4 Overall, the plan is considered to positively manage the expected future growth of the town in a way that is likely to minimise impacts for air quality. **Broadly neutral effects** are therefore concluded as most likely.

7.4 Biodiversity

- 7.4.1 The neighbourhood area is not within proximity of European designated biodiversity sites, and unlikely to lead to significant effects in this respect. Whilst there are no nationally designated sites within the neighbourhood area itself, the town falls within the Impact Risk Zones associated with nearby Sites of Special Scientific Interest (SSSIs) – Tingewick Meadows, Pilch Fields, and Foxcote Reservoir and Wood.
- 7.4.2 The draft plan proposes large-scale growth at a single location in the south-west of Buckingham (Policy HP3). Development at this site (and at the scale of 800 homes), as well as at Sites B (Canal Area) and E (Tingewick Road/Bath Lane) allocated under Policy HP2 will require further consultation with Natural England with regards to the potential impacts at nearby SSSIs. Feedback through Regulation 14 consultation will be expected to initiate such feedback, but given the distance and available mitigation no significant effects are considered likely at this stage.
- 7.4.3 None of the sites allocated within the NP are known to contain priority habitat, but six do lie adjacent to priority deciduous woodland habitats that should be protected from both short-term (during construction) and long-term impacts of development (e.g., noise and light impacts). Policy ENV2 notably links priority habitats, along with other land of biodiversity value, to an identified green and blue infrastructure network that is afforded protection under the policy from development that may undermine its integrity. This is further supported by Policy ENV1 which identifies a 'Green Ring' around the

town, where the extension and enhancement of green infrastructure is sought in development.

- 7.4.4 Further of benefit to biodiversity, Policy ENV3 seeks to incorporate urban greening measures in major development, particularly in the design of buildings, hard surfaces, and landscaping schemes. Policy ENV4 promotes high-quality private spaces in new development that allow for a variety of uses, including the cultivation of plants and vegetables, and Policy ENV5 designates and protects Local Green Spaces.
- 7.4.5 The environment section of the NP, alongside the spatial strategy, perform well in respect of supporting an increase in biodiversity and **minor positive effects** are concluded as most likely, however, **uncertainty** remains until consultation with Natural England is undertaken.

7.5 Climate change adaptation

- 7.5.1 Recognising the town's close association with the River Great Ouse, flood risk is a key consideration for future growth in the neighbourhood area. The spatial strategy directs most growth to a single large site in the south-west, away from the Flood Zones associated with the river. However, there are urban area allocations under Policy HP2 that intersect Flood Risk Zones 2 and 3 (Sites A, B, C, E, and K). The town is also at risk from other sources of flooding, including surface water flood risk at many of the allocation sites.
- 7.5.2 Most of the urban allocation sites are brownfield redevelopment sites, apart from Site B which is a rolled over allocation site from the made plan (and thus previously found sound as an allocation site). At Site B there is also good potential to avoid development in areas of the site that fall within Flood Zones 2 and 3. Development proposals for these sites where over 1ha, in accordance with Policy I1, will need to be accompanied by a site-specific flood risk assessment that demonstrates that proposals will not increase flood risk from any form of flooding, and takes opportunities to reduce flood risk where possible. The policy stipulates that managing flood risk must take account of the impacts of climate change over the lifetime of the development and deliver Sustainable Drainage Systems (SuDS) as appropriate. The small sites of less than 1ha that are allocated in the plan are all brownfield sites, where re-development is likely to provide opportunities to improve drainage and potentially reduce flood risk this way or alternatively development is directed to areas outside of Flood Risk Zones 2 and 3 on the site. There will be some reliance on the development management process to assess site specific flood risk assessments.
- 7.5.3 The policy measures outlined above, will also support water quality and the national efforts to improve the chemical and ecological status of the River Great Ouse in particular.
- 7.5.4 Overall, the spatial strategy is affected to some degree by flood risk and there is a reliance on policy mitigation and the development management process to reduce these risks. The policy mitigation provided by the draft NP is considered sufficient in this respect, and residual broadly **neutral effects** are concluded as most likely.

7.7 Climate change mitigation

- 7.6.1 In the context of a climate emergency, carbon/ greenhouse gas emissions from transport and the matter of built environment decarbonisation are both key issues for the future growth of Buckingham. Recognising the role of Buckingham in the settlement hierarchy and as an accessible and relatively sustainable location for growth in the district, there is ultimately an expectation that Buckingham will be a focus for strategic scale development with or without the neighbourhood plan. This growth has the potential to impact upon the highways network, which is discussed in more detail under the transport and air quality themes. Ultimately, the policy measures provided through the NP, such as those that seek to improve town centre and sustainable transport connections, and the spatial strategy which seeks to minimise growth impacts, collectively reduce the potential for negative effects of significance.
- 7.6.2 On the matter of decarbonisation, there are notable plan policies which seek to improve the efficiency of the built environment in Buckingham. Policy DH4 is dedicated to addressing ‘the performance gap’ whereby development in occupation would be tested to ensure it meets the proposed design standards and implements any corrective actions that may be necessary. High design and efficiency standards are set, with, for example, Policy DH4 requiring all development be ‘zero carbon ready’ by design and encouraging the re-use of existing buildings where possible to capture their embodied carbon. This policy further requires (except in householder applications) a Sustainability Statement to accompany development proposals demonstrating how standards will be met. More stringently, major development is also required to submit a ‘Whole Life-Cycle Carbon Emission Assessment’ and demonstrate the actions being taken to reduce embodied carbon resulting from both construction and use.
- 7.6.3 These efforts are extended to the historic core of the town, with Policy DH3 supporting retrofitting in the Conservation Area that would considerably improve energy efficiency and reduce emissions, and/ or increase the longevity of heritage assets.
- 7.6.4 Overall, the proposed policy measures are considered likely to support local priorities to increase climate resilience, and **minor positive effects** are concluded as most likely.

7.8 Communities and wellbeing

- 7.7.1 With access to community infrastructure given detailed attention through its own SEA objective, the focus here relates settlement identity (preventing sprawl and coalescence) and community wellbeing, in terms of health, safety, deprivation, and equalities and inclusiveness.
- 7.7.2 In relation to settlement identity, the spatial strategy allocates most housing growth (around 800 homes) to a large site in the south-west of the town, which alongside the recently committed development east of Gawcott Road, will contribute to coalescence with Gawcott, particularly with its outlying employment areas (off Radclive Road and off Gawcott Road). Minor negative effects are anticipated in this respect. Furthermore, the A421 creates some severance between new development and the existing town,

essentially north of this bypass. Notably, new development here, particularly strategic scale development, has the potential to reduce this severance for both new and existing residents at Gawcott Road, by creating safe crossing points and alternative active travel routes to employment areas and Lace Hill to the east (in combination with committed development). Policy HP3 does identify that a highways scheme for the site must comprise measures to encourage and enable safe walking and cycling to the town centre, but it is recommended that the need for safe walking, cycling, and wheeling crossings at the A421 is made more explicit.

- 7.7.3 The allocated 10ha employment development site, planned as an extension south of Buckingham Industrial Estate (Policy EE2), largely coincides with the extent of development south at Lace Hill. This ‘rounding off’ effect is likely to be less impactful.
- 7.7.4 With the remainder of the site allocations located within the urban area, and predominantly targeting brownfield redevelopment opportunities, the forecasted growth here has good potential to integrate with the existing community area in accessible locations that promote inclusivity. Town centre brownfield regeneration, as highly accessible development, also provides good opportunities to reduce deprivation, particularly through the delivery of affordable housing and specialist housing. Of note in this respect, Site J allocated under Policy HP2 is expected to deliver much needed specialist housing.
- 7.7.5 With a plan section dedication to health and wellbeing, positive effects are anticipated from the policy measures to improve sustainable transport access and active travel opportunities (Policy CLH1), expand cultural and recreational facilities in the town (Policy CLH4) as well as healthcare provisions (Policy CLH3), and improve green infrastructure and walking routes in the canal area (Policy CLH2). Positive effects are also anticipated from environmental policies which seek to improve access to nature for residents. This includes the policies measures which ensure private outdoor space and higher levels of urban greening in new development (Policies ENV3 and ENV4), reinforce a green and blue infrastructure network throughout the town (Policy ENV2) – including by introducing a Green Ring around the town (Policy ENV1), and by supporting access to a range of designated Local Green Spaces in the town (Policy ENV5).
- 7.7.6 Overall, there are policy measures that are likely to support health and wellbeing and deliver **minor positive effects**, but the spatial strategy also has implications for settlement identity (contributing to coalescence) and there needs to be targeted efforts at the strategic development site to reduce the severance with the town created by the bypass. **Minor negative effects** are also therefore predicted.

7.9 Economy and employment

- 7.8.1 With strategic housing growth planned for the town, a key consideration is sustainable access to employment locations, and the potential for new employment land opportunities to be identified to support the forecasted growth in residents in accessing job opportunities.

- 7.8.2 In this respect, the plan performs well by identifying a strategic 10ha site to the south of Buckingham Industrial Site (Policy EE2) as a prime location for further employment development. This site is suitably connected to existing bus routes as an existing employment destination. Most notably, there is also potential to improve active travel connections between the new housing growth (including the committed development) in the south-west and this employment area. Policy EE2 recognises this potential, requiring that development provides pedestrian and cycle links to proposed and existing cycleways and, on top of this, delivers improvements to pedestrian and cycle links into the town.
- 7.8.3 Policy EE1 is dedicated to supporting the vitality of Buckingham Town Centre, by maintaining a healthy mix of uses, improving journeys in and around town, and enhancing public spaces and the historic streetscape.
- 7.8.4 In addition to above, Policies EE3 and EE4 seek to ensure the continued growth and expansion of educational facilities supporting the local economy and resident workforce and Policy I2 provides great weight to improving digital infrastructure that supports the local economy and homeworking.
- 7.8.5 Policy CLH supports positive regeneration of the canal area, delivering mixed-use development that includes a new visitor centre, improved active travel connections, and enhanced green infrastructure. These measures are likely to support the tourism industry and economic performance of this area.
- 7.8.6 With identified opportunities for continued economic growth, alongside support for the tourism industry and protection of established educational facilities (including allowing space for these facilities to grow), **significant positive effects** are predicted overall.

7.10 Historic environment

- 7.9.1 The neighbourhood area is recognised to contain a wealth of designated and non-designated heritage assets that contribute significantly to local character. It will be important to ensure that future growth of the town does not undermine the significance of Buckingham's heritage.
- 7.9.2 The spatial strategy for the NP allocates most growth to the south-west of the town at a single large site. This site is south of the bypass and removed from the historic core and designated conservation area. It is not known to contain any designated heritage assets or lie in the immediate vicinity of any. St Rumbold's Well is located north of the bypass (adjacent Buckingham Railway Walk), which is a designated scheduled monument (holy well) that is the last visible feature of the cult of the saint. The structural remains of the early 17th century conduit house are of considerable significance, which has been a historic place of pilgrimage. The spatial relationship between the cultivation pattern (ridge and furrow) and the site of St Rumbold's Well is also of importance and development in the countryside surrounding it will likely need to consider potential archaeological impacts.
- 7.9.3 Urban area allocations are also made, which include identified brownfield redevelopment sites and rolled over allocations from the made plan. Three of the allocated brownfield sites (Sites C, H, and K) are located within the Buckingham Conservation Area, and another two brownfield sites (Sites A

and E) lie adjacent to it. This setting contains many listed buildings which lie close to these sites, as well as non-designated heritage assets. Two brownfield sites (Sites A and K) also contain non-designated heritage assets. With most of these sites, given their brownfield and/ or derelict nature, development is considered to have good potential, guided by the Buckingham Design Code (Policy DH1) to improve the immediate townscape and heritage setting. With the introduction of Policy DH2, identifying and providing protection for non-designated assets, it is also assumed that significant effects can be avoided at Sites A and K. Site J is a greenfield site adjacent to St Rumbold's Well, however, this site is a rolled over allocation from the made plan, that has previously been found sound as an allocation site.

- 7.9.4 Asides from the Buckingham Design Code (Policy DH1), which will support the retention and enhancement of the historic townscape setting, Policy DH2 identifies and protects the significance of a list of local (non-designated) heritage assets, directly benefitting this SEA theme, and Policy CLH2 seeks to guide positive redevelopment of the canal area. Indirect positive effects are also expected through the plan efforts to identify and protect a network of green and blue infrastructure assets (Policy ENV2) and increase levels of urban greening in new development (Policy ENV3).
- 7.9.5 Overall, whilst the spatial strategy includes development within highly sensitive heritage settings, this is largely targeted brownfield regeneration, which, supported by the introduction of the Buckingham Design Code, provides good opportunities for positive townscape enhancements. The supporting policy framework also provides wider historic environment benefits, particularly by introducing the design code, and by identifying and protecting local (non-designated) assets. On this basis, accounting for the policy mitigation provided, residual **minor positive effects** are concluded as most likely.

7.11 Homes

- 7.10.1 Buckingham is a strategic location for future growth in Buckinghamshire, with significant contributions to the district's housing supply over the plan period expected. The NP recognises this through Policy HP1, which identifies a new settlement boundary encompassing suggested additional site allocations and recently committed development sites, and making provision for around 1,200 new homes and 10ha of employment land.
- 7.10.2 Whilst the delivery of new homes is ultimately associated with significant positive effects under this SEA theme, there is a recognised need to deliver a wide range of types, sizes, and tenures to maintain a balanced housing supply and address the future housing needs of the neighbourhood area.
- 7.10.3 The NP provides Policy HP5 to guide a suitable mix of housing types, sizes and tenures, and Site J is specifically allocated to include the delivery of specialist housing for older people. Considering the allocations in the made neighbourhood plan also saw land allocated for growth in the number of university rooms, the combined growth over the planning periods significantly contribute to delivering a varied mix of development that supports resident needs.

7.10.4 Overall, with the significant contributions to new housing, **significant positive effects** are considered very likely.

7.12 Landscape

- 7.11.1 The town has a notable historic core from which it has grown, and the spire of St Peter & St Paul's Church is a notable landmark. It is also shaped by the River Great Ouse which runs through the town and at the centre is a network of green spaces referred to as the Heartlands. Residential and industrial areas surround the core and form different character areas. The town is surrounded by countryside with sensitive locally designated landscapes (designated in the Vale of Aylesbury Local Plan) to the north and east.
- 7.11.2 The growth strategy for the Buckingham NP allocates most housing development to the southwest of the town (Policy HP3), avoiding the most sensitive landscape areas. Similarly, employment growth is allocated to the south of the town (Policy EE2) again avoiding the most sensitive landscape areas. This is supported by urban area allocations (Policy HP2), formed predominantly of brownfield redevelopment sites. With many of these sites vacant or underutilised, development has good potential to improve upon the immediate townscape within the urban area, particularly when considering the introduction of the Buckingham Design Code (Policy DH1) guiding such development proposals.
- 7.11.3 The allocation for development of the canal area is rolled over from the made plan, and Policy CLH2 clearly requires sensitive development in this area that responds to the Local Landscape Area designation (in the east of the town). Proposals are expected to submit a green infrastructure strategy, demonstrate biodiversity net gains of at least 10%, minimise any loss of existing mature trees and hedgerows, meet an Urban Greening Factor set by the policy, introduce new permanent or ephemeral waterbodies, and include a landscape buffer along the River Great Ouse.
- 7.11.4 Wider plan efforts to enhance and extend an identified green and blue infrastructure network (Policy ENV2) – including through the introduction of a 'Green Ring' around Buckingham (Policy ENV1), the designation of Local Green Spaces (Policy ENV5), and through increased levels of urban greening in new development (Policy ENV3) – will support the long-term retention and protection of assets and key landscape features.
- 7.11.5 Overall, the spatial strategy performs well by largely avoiding development in the most sensitive landscape areas surrounding the town (with the exception of the canal area – a rolled over allocation from the made plan – which lies within a designated Local Landscape Area) and promoting brownfield regeneration that positively affects the townscape setting. Despite this, it is recognised that most growth will be delivered through an urban extension in the south-west, resulting the loss of countryside/ greenfield land in this area. On this basis, **minor negative effects** are concluded as most likely.

7.13 Soils/ resources

7.12.1 A key focus for this theme is the potential for future growth to impact upon high-quality soil resources surrounding the town, including best and most

versatile agricultural land, and any opportunities to optimise efficient land use (e.g., through brownfield regeneration and/ or intensification).

- 7.12.2 The plan performs notably well in terms of promoting urban area allocation sites that are predominantly formed of brownfield regeneration sites, maximising the efficient use of land. Despite this, it is recognised that there are not enough brownfield sites to meet the forecasted housing needs, meaning an element of greenfield development is necessary. Two of the urban area allocation sites under Policy HP2 are greenfield sites, but both are rolled over allocations from the made neighbourhood plan (i.e., these sites have already been found sound as housing allocation sites). The main focus is therefore paid to the large strategic site allocated to the south-west of Buckingham (Policy HP3), which will deliver most of the housing development needs, as well as the 10ha extension to Buckingham Industrial Estate allocated for employment purposes under Policy EE2.
- 7.12.3 These large sites both lie in the rural surrounds of the town, in the south-west and south. Both sites encompass agricultural land, that has the potential to be 'best and most versatile' (i.e., high-quality soil resources). At this scale, the cumulative loss of agricultural land is of significance, and overall **significant negative effects** are therefore predicted, whilst recognising that these effects are also largely unavoidable given the land availability situation. Most of the allocation sites also lie within a Mineral Safeguarding Area, where development will require consultation with the Minerals Authority.

7.14 Transport

- 7.13.1 As a focus for strategic growth, transport considerations will be paramount for the plan, both in terms of minimising impacts to the local road network and optimising the potential for future residents to adopt sustainable travel patterns.
- 7.13.2 The spatial strategy notably places most housing growth (around 800 of the 1200 new homes) to the south-west of the town, off the A421. The site could provide good access to the bypass, directly linking development with Buckingham's main employment areas and supermarkets in the south of the town, and to Milton Keynes in the east. The road connections also provide access to the town centre.
- 7.13.3 Alongside the recently committed development, bus connections would ideally need to be extended to support the growth of the town in the south-west. Furthermore, the A421 creates some severance between the town and the growth area, which would need to be addressed with new safe pedestrian and cycle crossing points (see community wellbeing theme).
- 7.13.4 The remaining housing development is directed to within the urban area, notably including highly accessible town centre brownfield regeneration sites. Employment development is also proposed to the south of Buckingham Industrial Estate which is an established employment area with existing bus service connections. Additionally, Policy EE1 seeks to improve journeys to and within the town centre.

- 7.13.5 Wider plan policies also seek to improve sustainable transport access (e.g., Policy CLH1), with particular attention paid to improving active travel opportunities (including by strengthening green infrastructure networks).
- 7.13.6 Overall, the spatial strategy performs well in terms of reducing the impact of new development on the highways network, particularly within the historic core of the town, and wider plan policy measures seeks to improve sustainable transport access and active travel opportunities. Therefore, it is considered likely that significant negative effects could be avoided, and **residual minor positive effects** could be realised if opportunities to extend bus routes into the south-west of the town and reduce severance caused by the bypass are addressed.

7.15 Water

- 7.14.1 Water supply and wastewater treatment are the main considerations here given the attention paid to water quality under the climate change adaptation theme. The NP provides policy measures that will support both a high water efficiency standard (110 litres per person per day) and ensure that the sewer network can accommodate the additional demand created by new development prior to occupation (Policy I1). Policy I1 supports the wider actions of the Water Resources Management Plan in this respect, as well as efforts to maintain wastewater treatment capacity, and **minor positive effects** are concluded as most likely as a result.

8. Conclusions and recommendations

8.1 Conclusions

8.1.1 The following conclusions are reached for each theme:

SEA theme	Conclusion
Accessibility (to community infrastructure)	Overall, the delivery of new community infrastructure alongside contributions from new development (guided by the plan policies) to improving access to community infrastructure, is considered likely to lead to significant positive effects .
Air quality	Overall, the plan is considered to positively manage the expected future growth of the town in a way that is likely to minimise impacts for air quality. Broadly neutral effects are therefore concluded as most likely.
Biodiversity	The environment section of the NP, alongside the spatial strategy, perform well in respect of supporting an increase in biodiversity and minor positive effects are concluded as most likely, however, uncertainty remains until consultation with Natural England is undertaken.
Climate change adaptation	Overall, the spatial strategy is affected to some degree by flood risk and there is a reliance on policy mitigation and the development management process to reduce these risks. The policy mitigation provided by the draft NP is considered sufficient in this respect, and residual broadly neutral effects are concluded as most likely.
Climate change mitigation	Overall, the proposed policy measures are considered likely to support local priorities to increase climate resilience, and minor positive effects are concluded as most likely.
Communities and wellbeing	Overall, there are policy measures that are likely to support health and wellbeing and deliver minor positive effects , but the spatial strategy also has implications for settlement identity (contributing to coalescence) and there needs to be targeted efforts at the strategic development site to reduce the severance with the town created by the bypass. Minor negative effects are also therefore predicted.
Economy and employment	With identified opportunities for continued economic growth, alongside support for the tourism industry and protection of established educational facilities (including allowing space for these facilities to grow), significant positive effects are predicted overall.
Historic environment	Overall, whilst the spatial strategy includes development within highly sensitive heritage settings, this is largely targeted brownfield regeneration, which, supported by the introduction of the Buckingham Design Code, provides good opportunities for positive townscape enhancements. The supporting policy framework also provides wider historic environment benefits, particularly by introducing the design code, and by identifying and protecting local (non-designated) assets. On this basis, accounting for the policy mitigation provided, residual minor positive effects are concluded as most likely.
Homes	Overall, with the significant contributions to new housing, significant positive effects are considered very likely.

SEA theme	Conclusion
Landscape	Overall, the spatial strategy performs well by largely avoiding development in the most sensitive landscape areas surrounding the town (with the exception of the canal area – a rolled over allocation from the made plan – which lies within a designated Local Landscape Area) and promoting brownfield regeneration that positively affects the townscape setting. Despite this, it is recognised that most growth will be delivered through an urban extension in the south-west, resulting the loss of countryside/ greenfield land in this area. On this basis, minor negative effects are concluded as most likely.
Soil/ resources	These large sites both lie in the rural surrounds of the town, in the south-west and south. Both sites encompass agricultural land, that has the potential to be 'best and most versatile' (i.e., high-quality soil resources). At this scale, the cumulative loss of agricultural land is of significance, and overall significant negative effects are therefore predicted, whilst recognising that these effects are also largely unavoidable given the land availability situation. Most of the allocation sites also lie within a Mineral Safeguarding Area, where development will require consultation with the Minerals Authority.
Transport	Overall, the spatial strategy performs well in terms of reducing the impact of new development on the highways network, particularly within the historic core of the town, and wider plan policy measures seeks to improve sustainable transport access and active travel opportunities. Therefore, it is considered likely that significant negative effects could be avoided, and residual minor positive effects could be realised if opportunities to extend bus routes into the south-west of the town and reduce severance caused by the bypass are addressed.
Water	The NP provides policy measures support both a high water efficiency standard and ensure that the sewer network can accommodate the additional demand created by new development prior to occupation. This support for the wider actions of the Water Resources Management Plan, as well as efforts to maintain wastewater treatment capacity, mean minor positive effects are concluded as most likely as a result.

8.2 Recommendations

- 8.1.2 Whilst recognising there is a need to initiate consultation with Natural England and the Minerals Authority (which is recommended), the main recommendation for the Buckingham NP is to better address the need to reduce the severance caused by the A421 when developing the town beyond this bypass route. This could be through specific policy requirements for new safe walking, cycling, and wheeling crossings at the A421 in development proposals.

Part 3: What are the next steps?

9. Next steps and monitoring

9.1 Next steps

- 9.1.1 This Environmental Report accompanies the Buckingham NP for Regulation 14 consultation.
- 9.1.2 Following consultation, any representations made will be considered by the Steering Group, and the Neighbourhood Plan and Environmental Report will be updated as necessary. The updated Environmental Report will then accompany the Buckingham NP for submission to the Local Planning Authority, Buckinghamshire Council, for subsequent Independent Examination.
- 9.1.3 Following submission, the plan and supporting evidence will be published for further consultation, and then subjected to Independent Examination. At Independent Examination, the Buckingham NP will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Local Plan.
- 9.1.4 Assuming that the examination leads to a favourable outcome, the Buckingham NP will then be subject to a referendum, organised by Buckinghamshire Council. If more than 50% of those who vote agree with the NP, then it will be 'made'. Once 'made', the Buckingham NP will become part of the Development Plan for Buckinghamshire, covering the defined neighbourhood area.

9.2 Monitoring

- 9.2.1 The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report. This refers to the monitoring of likely significant effects of the Buckingham NP to identify any unforeseen effects early and take remedial action as appropriate.
- 9.2.2 It is anticipated that monitoring of effects of the Buckingham NP will be undertaken by Buckinghamshire Council as part of the process of preparing its Annual Monitoring Report (AMR). No significant negative effects are considered likely in the implementation of the Buckingham NP that would warrant more stringent monitoring over and above that already undertaken by the local authority.

Appendices

Appendix A – Regulatory requirements

As discussed in **Chapter 1**, 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 AA.1** links the structure of this report to an interpretation of Schedule 2 requirements, whilst **Table AA.2** explains this interpretation. Finally, **Table AA.3** identifies how and where within the Environmental Report the regulatory requirements have been/ will be met.

Table AA.1 Questions answered by this Environmental Report in-line with an interpretation of regulatory requirements

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

Table AA.2 Questions answered by this Environmental Report, in-line with regulatory requirements

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

Table AA.3 ‘Checklist’ of how (throughout the SEA process) and where (within this report) regulatory requirements have been, are and will be met

Regulatory requirement	Discussion of how the requirement is met
Schedule 2 requirements:	
1. An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.	Chapter 1 (‘What’s the plan seeking to achieve’) presents this information. The relationship with other plans and programmes was explored through a stand alone SEA Scoping Document.
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report published in December 2023. The outcome of scoping was an ‘SEA Framework’, and this is presented within Chapter 3 (‘What’s the scope of the SEA’). More detailed messages from the Scoping Report - i.e., messages established through context and baseline review - are presented within Appendix B. This also includes updates to scoping since the publication of the Scoping Report.
3. The environmental characteristics of areas likely to be significantly affected.	
4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	
5. The environmental protection objectives established at international, national, or community level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	The Scoping Report (Dec 2023) presents a detailed context review and explains how key messages from the context review (and baseline review) were then refined to establish an ‘SEA framework’. The key issues derived from scoping information is presented in Appendix B and includes any relevant updates. The context review informed the development of the SEA framework and topics, presented in Chapter 3, which provide a methodological ‘framework’ for appraisal. With regards to explaining “how... considerations have been taken into account” - <ul style="list-style-type: none"> • Chapter 3 explains how reasonable alternatives were established in-light of available evidence. • Chapter 4 sets out the assessment of reasonable alternatives. • Chapter 5 explains the Council’s ‘reasons for supporting the preferred approach’, i.e., explains how/ why the preferred approach is justified in-light of alternatives appraisal (and other factors). • Chapter 7 sets out the findings of the appraisal of the draft plan and Chapter 8 provides a summary of the findings and any recommendations.
6. The likely significant effects on the environment, including on issues such as biodiversity, population, human	<ul style="list-style-type: none"> • Chapter 3 explains how reasonable alternatives were established in-light of available evidence.

Regulatory requirement

Discussion of how the requirement is met

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. (Footnote: these effects should include secondary, cumulative, synergistic, short-, medium-, and long-term, permanent and temporary, positive and negative effects).

- Chapter 4 sets out the detailed appraisal of alternative options.
- Chapter 7 sets out the findings of the appraisal of the draft plan and Chapter 8 provides a summary of the findings and any recommendations.

As explained within the various methodology sections, as part of appraisal work, consideration has been given to the SEA scope, and the need to consider the potential for various effect characteristics/ dimensions.

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.

Where necessary, mitigation measures are identified within the alternatives appraisal (in Chapter 4) and appraisal of the Draft Local Plan (Chapters 7 and 8).

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.

Chapter 3 deals with 'Reasons for selecting the alternatives dealt with', in that there is an explanation of the reasons for focusing on particular issues/ options.

Also, Chapter 5 explains the Council's 'reasons for selecting the preferred option' (in light of alternatives appraisal). Methodology is discussed at various places, ahead of presenting appraisal findings, and limitations/ assumptions are also discussed as part of appraisal narratives.

9. A description of the measures envisaged concerning monitoring in accordance with Article 10.

At this stage no additional monitoring measures are identified as being necessary over and above those already being considered by the Local Authority.

10. A Non-Technical Summary of the information provided under the above headings.

A Non-Technical Summary (NTS) is provided at the start of the report.

The Environmental Report must be published alongside the Draft Plan, in accordance with the following regulations: 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 and 6.2).

At the current time, this Environmental Report is being published alongside the Regulation 14 draft Buckingham NP for public consultation.

The Environmental 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.

The Council will take into account this Environmental Report when preparing the submission version of the NP for further publication.

Appendix B – Scoping information

The key issues that have informed the development of the Buckingham SEA framework are provided in this Appendix.

B.1 Accessibility (to community infrastructure)

New housing development in the neighbourhood area has the potential to increase pressure on the existing community infrastructure. This could have a negative impact, especially on the health of residents, through potential reductions in access. However, new development through the BNDPR could also bring forward new community infrastructure, which would support new and existing residents in Buckingham.

B.2 Air quality

Whilst there are no AQMAs within or in proximity to the neighbourhood area, and monitored pollutants in Buckingham are recorded to be under the national air quality objectives, it is possible development through the BNDPR could impact on local air quality. This is due to the level of development the BNDPR is considering bringing forward.

New development through the BNDPR could increase levels of traffic and congestion through the Buckingham town centre. This is likely to exacerbate existing concerns over traffic but could also lead to increased levels of tailpipe emissions, especially NO₂. This could contribute to an increase in NO₂ recorded at the monitoring locations, and a potential decline in local air quality.

B.3 Biodiversity

Though not in the neighbourhood area, neither the Foxcote Reservoir and Wood SSSI and the Tingewick Meadows SSSI are in 100% favourable condition. It will be important to ensure development through the BNDPR will not further exacerbate the condition of these designations.

There are a number of sites within the Buckingham neighbourhood area that have a varying degree of importance for nature conservation in the local area. Development through the BNDPR should be removed from these sites as much as possible so as not to compromise non-designated, locally important sites.

There are areas within the Buckingham neighbourhood area that present an opportunity to enhance biodiversity value and connectivity. The BNDPR should take advantage of these opportunities where possible to secure biodiversity net-gain in line with national policy.

There are sensitive biodiversity designations that lie outside of but near the neighbourhood area that could also be affected in future growth.

B.4 Climate change adaptation

New development in the Buckingham neighbourhood area has the potential to exacerbate flood risk if it is built within and in proximity to areas at higher risk of

fluvial and surface water flooding. Development should be focused away from these areas where possible.

B.5 Climate change mitigation

The BNDPR is seeking to allocate sites for development. As such, it is likely CO₂ emissions originating from the area will increase. It will be important for new development to adopt best building practices to limit the increase in emissions, such as using sustainable materials and incorporating renewable energy infrastructure.

CO₂ emissions associated with the transport sector remain higher than other sectors in Buckinghamshire. This highlights the importance of accessible development and the delivery of sustainable transport infrastructure. The BNDPR can seek to address this locally, for example by delivering development that can be integrated into the sustainable transport network, by strengthening active and sustainable travel routes, and opportunities to increase self-containment.

B.6 Communities and wellbeing

Whilst most of the Buckingham neighbourhood area generally experiences similar and low levels of deprivation, the Aylesbury Vale 002B LSOA does generally experience greater levels of deprivation. The BNDPR presents the opportunity to assess and understand the spatial distribution of deprivation across the neighbourhood area, and work to lower deprivation in this particular LSOA to promote greater levels of equality.

The majority of the Buckingham neighbourhood area experiences higher levels of deprivation linked to barriers to housing and services. The BNDPR presents an opportunity to reduce the experienced deprivation by encouraging housing development in more accessible locations, and encouraging more affordable housing, subsidised housing for first time buyers, and specialist housing for older people. Additionally, improvements to the local economy through greater engagement with the services and facilities in Buckingham will likely contribute to greater vitality and viability of the town centre environment.

It will be important that future growth avoids/ minimises any contributions to coalescence to retain settlement identities.

B.7 Economy and employment

There may be a need for additional employment land allocations to meet the economic growth needs of Buckingham. It will also be important to protect the vitality of the town centre and tourism industry.

B.8 Historic environment

The Buckingham Conservation Area covers a large part of the historic core of Buckingham. Despite this, the conservation area appraisal is over ten years old. Given this key document is out of date, it is possible important features that currently contribute to the Buckingham Conservation Area are not recognised and / or appropriately protected in the appraisal. This could impact upon the historic environment through new development changing the setting of important features.

There are a number of designated heritage features in the neighbourhood area, all of which present a constraint to future development due to the need to avoid impacts to the features and their settings. The BNDPR can help maintain and enhance the historic environment by ensuring that development is sensitive to the historic setting of the neighbourhood area in terms of design and layout.

The BNDPR presents an opportunity to provide a growth strategy and supporting policy framework that protects the key historic characteristics of the neighbourhood area, which could also extend to protecting non-designated assets and their settings.

B.9 Homes

There is an expectation for strategic scale growth in Buckingham given its scale and location, it will be important that development delivers a wide range of housing types, sizes, and tenures to support resident needs.

B.10 Landscape

There are a number of TPOs in the neighbourhood area, which are important features of the settlements and likely contribute to a number of views. New development through the BNDPR should avoid visual impacts to and from these TPOs where possible to maintain the character and quality of built-up areas in Buckingham.

It will be important for the BNDPR to protect the local landscape, including its coherence and characteristics. This will bring benefits to other SEA themes, including biodiversity and climate change, by maintaining features which support wildlife and natural processes, such as gardens and areas of higher concentrations of trees.

B.11 Soils/ resources

It will be important for development to be focused away from undeveloped parts of Grade 2 ALC land, and away from Grade 3a land where possible, to avoid the loss of better quality agricultural land.

Given the neighbourhood area is within two mineral safeguarding zones, consultation with Buckinghamshire Council will likely need to occur before development can be brought forward. It will be important for development to be focused away from any important areas within these safeguarding zones in the neighbourhood area boundary.

B.12 Transport

Given the BNDPR is looking to allocate sites for development, it is expected there will be a change in the current transportation and movement baseline. This is due to the likely increase in private vehicles on the road linked to new development – which could contribute to increased levels of congestion, emissions, and issues with parking.

Development through the BNDPR has the potential to be integrated into the existing sustainable and active transportation networks. This could encourage a greater use of these transportation modes. Additionally, new development could encourage an

improvement in public transportation services, such as new and / or more frequent bus services.

B.13 Water

There is a need to maximise the efficient use of water resources to support the initiatives of the Water Resources Management Plan, as well as ensure sufficient wastewater treatment capacity prior to the occupation of new development.

