

AVDC Sustainability Appraisal / SEA

Vale of Aylesbury Plan Pre-submission Sustainability Appraisal

Audited by: Levett-Therivel Sustainability Consultants

September 2012

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- A Scoping report (October 2011, updated September 2012)
- B December 2011 appraisal of housing and jobs growth options
- C March 2012 appraisal of housing and jobs growth options
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- E August 2012 appraisal of affordable housing options
- F September 2012 appraisal of VAP Strategy

How to respond to this consultation

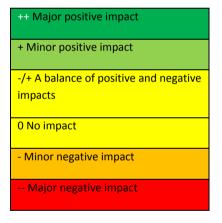
The consultation for this SA will run alongside the Vale of Aylesbury Plan: Strategy pre-submission publicity. Details will be provided.

Responses to the consultation on this SA report will be taken into account as the Vale of Aylesbury Plan is finalised.

Executive summary

- 1.1 This Sustainability Appraisal (SA) forms the final SA for the Vale of Aylesbury Plan: Strategy document. It draws together all previous stages of SA to show how the SA process has helped shape the plan. Previous SA's which have been carried out are listed below. These form part of the appendix to this SA.
 - An SA Report¹ (Appendix B) of the broad options for jobs and housing levels, and broad apportionment scenarios for the District was published from December 2011 to January 2012.
 - An SA Addendum (Appendix C) was produced in March 2012 informing the 15 May 2012 Cabinet meeting² which considered the VAP consultation responses to date, and the next stages of preparing VAP. This considered VAP aims, growth levels of jobs and homes, and an approach for testing how these growth levels will be distributed across in the District.
 - A further SA addendum (Appendix D) was produced in July to inform the 14 August Cabinet meeting³ which reconsidered VAP aims, growth levels of jobs and home, and the approach to apportioning homes across the district, along with draft plan vision and strategic aims.
 - A separate SA report was produced in July 2012 and published in August 2012 for an affordable housing consultation (Appendix E). This considered the different policy options for affordable housing in the VAP.

- This final SA report was been produced in September 2012 and published in October 2012 drawing together all previous SA's and the impacts of the VAP: Strategy pre-submission document. This included a detailed appraisal of the VAP strategy document for the overall vision, objectives and strategic polices (Appendix F).
- 1.2 Below summarises the likely impacts of the VAP: Strategy presubmission document. The affect of the vision, objectives or strategic polices on the SA objective was scored as follows:



Where the impact is uncertain a "?" has been added.

¹ www.aylesburyvaledc.gov.uk/planning-building/planning-policy/what-is-the-vale-of-aylesbury-plan-/sustainability-appraisal/sustainability-appraisal-stage-1/

²http://committees.aylesburyvaledc.gov.uk/committees/committees.aspx?commid=74&meetid=1343

www.aylesburyvaledc.gov.uk/local-development-plans/planning-policy/vale-of-aylesbury-plan-/sustainability-appraisal/

Table 1: Summary Appraisal of VAP

SA objective	Cum	ulative impacts of the VAP	
1. Community wellbeing	+	The VAP will deliver 6000 new homes (including affordable housing) on top of existing commitments, and employment to meet local needs. It says little about the needs of subgroups of residents, notably the elderly and Gypsies and Travellers.	
2. Health and equalities	++	The VAP vision and objectives are for Aylesbury Vale residents to live longer, healthier lives. VAP policies that support this include those on housing delivery (VS7 – VS9), developer contributions including for recreational open space (VS3), and green infrastructure (VS10).	
3. Design	+	The VAP vision is for well-designed developments that are sensitive to the district's local character and well integrated with existing communities. will help to ensure that new developments are of high quality and respect their surroundings. Objective 5 promotes quality design, and policies VS2 and VS6 promote good design.	
4. Crime and safety	0	The vision mentions safety several times, and the VAP's emphasis on town centres and good design will help to improve safety. However overall the VAP Strategy is unlikely to have a significant effect on crime or safety. Instead it is more likely to be addressed through more detailed site-specific policies or masterplans linked to VAP Strategy.	
5. Services	++	The VAP, and particularly policy VS3, aims to	
6. Green infrastructure	+	ensure that development is supported by the necessary investment in new infrastructure and services, and that access to community facilities and services (including health care and recreation	

		space) are improved.	
7. Retail provision	+	VS6 supports the delivery of accessible retail facilities, and aims to prevent the loss of retail provision in rural settlements.	
8. Town and village centres	+	The VAP vision sets out how Aylesbury and Buckingham will be improved through development, and VS2 states that development will be focused at Aylesbury and Buckingham, supported by growth at other strategic settlements and larger villages.	
9. Workforce and skills	+	The spatial vision aspires that people in Aylesbury Vale will have access to excellent education and training opportunities, and the vision for Aylesbury is that it will have 'enhanced its role and reputation as a centre for education diversity and excellence', similarly for Buckingham that it will be a 'hub of higher education and skills'.	
10. Employment & economy	++	VS2 and VS4 support the provision of at least 6000	
11. Employers and economy	++	new jobs by 2031. VS4 and VS5 support the safeguarding of existing employment sites (and associated jobs) and the delivery of new sites, as well as growth of the rural economy.	
The VAP will deliver 6000 new homes, including affordable housing. This meets the existing and future housing needs of people in the district, an includes consideration of any needs originating from neighbouring authorities.		affordable housing. This meets the existing and future housing needs of people in the district, and includes consideration of any needs originating	
13. Best use of land	0	Most of the proposed development will be accommodated in the largest settlements in Aylesbury Vale, which have the widest range of facilities and services and offer the greatest potential for self containment. This will help to make more efficient use of urban land. However	

		most of the new development will inevitably be on Greenfield land.
14. Transport and	0	The VAP will help to provide a better
15. Air quality	•	balance between employment opportunities and the resident workforce – reducing net outward commuting. The vision notes the need to create an environment that it is more conducive to use of public transport, cycling and walking. However the vision otherwise says little about transport except to promote the Eastern Link Roads and East West Rail (vision, VS2, VS3). The scale of new development envisaged will inevitably increase traffic, congestion, and air pollution.
16. Landscape	-	The vision says only that Aylesbury will be used as
and heritage	'	a base to explore local nature conservation,
17. Biodiversity	1	landscape and historic attractions. Objective 6 notes that development will be managed in a way that ensures the protection and enhancement of the historic and natural environment, and VS10 is wholly about protecting environmental assets, heritage and green infrastructure. However major greenfield development will inevitably have significant impacts on the landscape and biodiversity.
18. Flooding	+	VAP objective b) refers to flood protection measures, and Objective 7 notes that flood protection should be improved and no Greenfield development, other than for essential strategic infrastructure should take place in flood risk zones.
19. Water & climate change	-	Policy VS10 aims to conserve and enhance watercourses, and supports SUDs. Policy VS11 is entitled 'sustainable construction' but says nothing about reducing water use. The scale of

		development anticipated by the VAP will inevitably increase water use and threaten water quality.
20. Energy & climate change	1	Policy VS11 provides criteria for determining whether renewable and lower carbon energy developments will be permitted, but does not specifically support such developments. The scale of development anticipated by the VAP will inevitably increase greenhouse gas emissions and waste generation.

Changes made to the VAP in response to the Sustainability Appraisal

- 1.3 Key changes the planning team have undertaken as a result of the SA are identified as:
 - Further editing of the vision, objectives and policies
 - Greater focus on the environmental aspects of sustainability, including protection of high quality agricultural land, promoting sustainable modes of transport, promoting sustainable construction standards and reducing the use of natural resources
 - Greater detailing of meeting housing needs for local people including the different types such as gypsies, travellers, travelling show people and meeting the needs of the aging population. Also different mixes, sizes and tenure. As a result a new policy 'addressing local housing needs' was developed.
 - Greater detailing of phasing for development set out in VS7.
 - Further refinement of the text surrounding the polices for greater clarification.

Significant effects of the VAP Strategy

- 1.4 The likely significant effects of the VAP Strategy have been identified as:
 - The delivery of more housing (including affordable housing) and employment to meet local needs.
 - Working towards a more even balance of jobs to homes ratio to reduce out migration for employment
 - Greater opportunities for the workforce and reduction in skill inequalities.
 - Focused development in the most sustainable locations, which have the widest range of facilities and services and offer the greatest potential to integrate new and existing communities to develop cohesive sustainable communities.
 - Retaining local community services and facilities (including school, local shops and health care facilities)
 - Continued protection of the high quality landscape in Aylesbury Vale, although it's likely countryside to the east of Aylesbury Town will be lost to development through development that is already in the pipeline ahead of VAP.
 - Improvements to Aylesbury and Buckingham Town Centres.
 - Development that is supported by the necessary investment in new infrastructure, particularly at Aylesbury.
 - Conservation of natural resources, including biodiversity and local habitats.
 - Conservation of heritage assets.
 - New developments that are of high quality, respect their surroundings and discourage crime.

Overall effects of the VAP and mitigation

- 1.5 The main **short-term** (less than five years) effects of the VAP will be due to construction. These effects will include:
 - Land take from new development, and associated impacts on biodiversity, the landscape, and the historic environment.

 These effects are permanent and mostly negative.
 - Additional construction traffic, with impacts on congestion and air quality. These effects are temporary and negative.
 - New construction jobs and the economic benefits of construction. These effects are temporary and positive.
- 1.6 The main **medium-term** (five to ten years) and **long-term** (beyond ten years) effects will include:
 - Social and economic benefits of having more housing and employment development, with associated infrastructure.
 - There should be a greater number of jobs in the district, to readdress the jobs to homes balance, which will enable more sustainable communities and work travel patterns.
 - The benefits of the environmental protection policies will be evident through development which will be granted through the VAP, for example better use of renewables, construction standards and energy efficiency.
- 9.1 Key strategic infrastructure will have been delivered, for example Aylesbury Eastern Link Road and East-West Rail, which will help to better connect communities within the district and adjoining areas.

Conclusion

1.7 Overall the vision, objectives, and policies in VAP Strategy are likely to support sustainable development but with some of the SA objectives being addressed more strongly than others. An inherent difficulty in assessing a 'strategic' document is the relative lack of detail. This makes it difficult to determine the effects for some of the SA objectives because of the uncertainty about how it would be implemented. For example it was difficult to determine the effects of policies and options which considered the scale of housing development without greater detail about the locations of the housing. Nonetheless the SA has been a useful tool in raising awareness of potentially significant effects to inform decisions about the content of VAP.

Next Steps

Post adoption 'SEA statement'

1.8 Once the VAP is adopted, Aylesbury Vale District Council will publish an 'SEA statement' which explains how the sustainability appraisal influenced the LDP. Publication of such an SEA statement is required by the SEA Directive (Article 9.1b). Most of that information is already available in this SA report, but the SEA statement will also include information on how further rounds of SA, and consultation comments on this report and any further SA rounds, were taken into account by the planning team.

1 - Background and purpose of this Sustainability Appraisal/SEA

- 1.1 This Sustainability Appraisal/Strategic Environmental Assessment (SA) Report discusses the social, economic and environmental impacts of the Vale of Aylesbury Plan Strategy (VAP) pre-submission document.
- 1.2 Sustainability appraisal is an iterative and transparent process that aims to make a plan more sustainable. It tests the social, economic and environmental impacts of various plan options, to help choose the most sustainable options; and helps to fine-tune the preferred options. It also ascertains to what extent principles of sustainable development are integrated into the plan and its policies.
- 1.3 This SA assesses the impacts for the VAP vision, strategic objectives and plan policies. It also aims to draw together all previous SA for the preparation of the Vale of Aylesbury Plan. In this report:
 - Chapter 2 explains the methodology used in this sustainability appraisal;
 - Chapter 3 summarises the main points of the VAP Strategy;
 - Chapter 4 summarises and updates the key aspects of the previously published Scoping Report;
 - Chapters 5-7 assess the vision and objectives, strategic options and strategic policies for the Vale of Aylesbury Plan. Where these would have significant negative impacts, possible methods are identified to avoid or reduce these impacts;
 - Chapter 8 assesses the cumulative effects of the overall plan, and again suggests methods for avoiding or reducing any significant negative impacts;
 - Chapter 9 proposes a process of monitoring the VAP's actual impacts; and
 - Appendices provide more detailed information on various aspects of this report.

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 - Development that is supported by the necessary investment in new infrastructure, particularly at Aylesbury.
 - Conservation of natural resources, including biodiversity and local habitats.
 - Conservation of heritage assets.
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Changes made to the VAP in response to the Sustainability Appraisal

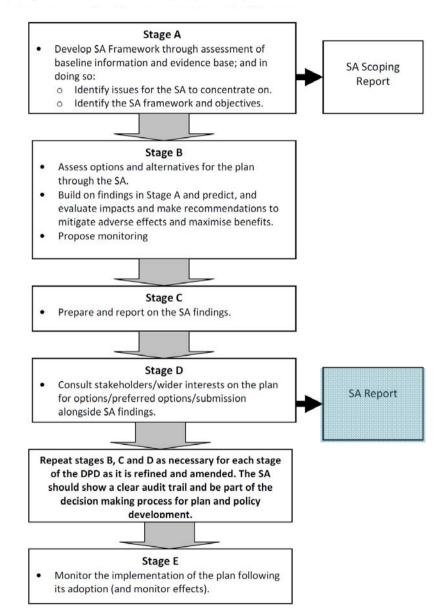
- 1.5 Key changes the planning team have undertaken as a result of the SA are identified as:
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- Greater detailing of phasing for development set out in VS7.
- Further refinement of the text surrounding the polices for greater clarification.

2 - Appraisal methodology

- 2.1 Sustainability Appraisal (SA) is a requirement of the Planning and Compulsory Purchase Act 2004. Strategic Environmental Assessment (SEA) is required by a European Union Directive⁴. This directive requires the preparation of an Environmental Report in which 'the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated'.
- 2.2 Given the considerable overlap between Sustainability Appraisal and Strategic Environmental Assessment, the Government has provided guidance⁵ on how the two processes can be combined. This appraisal has been carried out in accordance with that guidance so that this Sustainability Appraisal report satisfies the SEA requirements for an Environmental Report.
- 2.3 Figure 2.1 sets out the SA process as recommended in government guidance⁶. SA begins with the collection of background information about the policy context of the plan; the current and likely future economic, social and environmental conditions in the district; and existing problems. It also proposes an 'SA framework' which is used in later stages to appraise the plan. This information is compiled into a Scoping Report which is published for consultation and refined in response to consultation comments.

Figure 2.1 Sustainability appraisal process



¹ European Union Directive 2001/42/EC, which was transposed in to UK law by the Environmental Assessment Regulations for Plans and Programmes, 2004

⁵ Planning Advisory Service (2009) Sustainability Appraisal, www.pas.gov.uk/pas/core/page.do?pageId=152450.

⁶ ODPM et al. (2006) A Practical Guide to the Strategic Environmental Assessment Directive, www.communities.gov.uk/documents/planningandbuilding/pdf/practicalguidesea.pdf

Table 2.1 SEA Directive requirements

SEA requirement	Where covered in this report
1. An outline of the contents and main objectives of the plan or programme, and of its relationship (if any) with other relevant plans and programmes.	Chapter 3
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Chapter 4 and Appendix A
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 Council Directive 79/409/EEC on the conservation of wild birds and the Habitats Directive.	
5. The environmental protection objectives, established at international, Community or Member State 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.	
6. The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues including (a) biodiversity; (b) population; (c) human health; (d) fauna; (e) flora; (f) soil; (g) water; (h) air; (i) climatic factors; (j) material assets; (k) cultural heritage, including architectural and archaeological heritage; (l) landscape; and (m) the inter-relationship between the issues referred to in sub-paragraphs (a) to (l).	Chapter 5 (vision and objectives) Chapter 6 (options) Chapter 7 (policies) Chapter 8 (overall)
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.	

8. An outline of the reasons for selecting the alternatives dealt with, and	Chapter 6
a description of how the assessment was undertaken including any difficulties encountered in compiling the required information.	Chapter 2
A description of the measures envisaged concerning monitoring.	Chapter 9
10. A non-technical summary of the information provided under paragraphs 1 to 9.	Separate non- technical summary

- 2.4 Various options and parts of the plan (objectives, policies) are then appraised using the SA framework. Measures are identified to minimise any significant negative impacts and enhance positive ones. This information, including suggestions for future monitoring of the plan's actual impacts, are published in various rounds of SA report.
- 2.5 Once the plan is adopted, an 'SEA statement' must be published which explains how the SA information was considered in plan decision-making. The plan's impacts must also be monitored. Table 2.1 shows how this report fulfils the legal requirements of the Environmental Assessment of Plans and Programmes Regulations 2004.
- 2.6 For the Vale of Aylesbury Plan, a draft scoping report was published for consultation in July 2011. A final scoping report, which took the consultation findings into account, was published in October 2011. It provides background information on the social, economic and environmental situation in the district, and sets up a sustainability appraisal framework which can be used to test various plan options and the final plan. Chapter 4 updates relevant aspects of that report, and Appendix A is an updated version of the scoping report for this SA.

- 2.7 An SA Report⁷ (**Appendix B**) of the broad options for jobs and housing levels, and broad apportionment scenarios for the District was published from December 2011 to January 2012.
- 2.8 An SA Addendum (**Appendix C**) was produced in March 2012 informing the 15 May 2012 Cabinet meeting⁸ which considered the VAP consultation responses to date, and the next stages of preparing VAP. This considered VAP aims, growth levels of jobs and homes, and an approach for testing how these growth levels will be distributed across in the District.
- 2.9 A further SA addendum (**Appendix D**) was produced in July to inform the 14 August Cabinet meeting⁹ which reconsidered VAP aims, growth levels of jobs and home, and the approach to apportioning homes across the district, along with draft plan vision and strategic aims.
- 2.10 A separate SA report was produced in July 2012 and published in August 2012 for an affordable housing consultation (Appendix E). This considered the different policy options for affordable housing in the VAP.
- 2.11 This SA report and the previous SAs for VAP have helped to consider the strategic vision, aims and plan policies. It brings together this SA and other earlier SA's to show how the SA process has informed the Plan throughout its development. It does not form an addendum to previous SA undertake for the Vale of Aylesbury Plan.
- 2.12 This SA has been undertaken by AVDC officers and a consultant has been engaged to 'audit' this SA. Levett-Therivel sustainability consultants have reviewed the work undertaken and acted as a critical friend and auditor.

Appropriate Assessment/Habitats Regulations

2.13 An Appropriate Assessment/Habitats Regulations Assessment (AA/HRA) for the VAP Strategy was carried out in August-September 2012 in line with a EU Directive and Government guidance. The AA/HRA considers the impact of the VAP Strategy on the integrity of European sites designated for nature conservation. The AA/HRA seeks to avoid undesirable or damaging effects and avoid or mitigate any harmful outcomes of the Plan. The designated areas nearest to Aylesbury Vale are Ashridge Common and Woods, Ellesborough and Kimble Warrens, Tring Woodlands, Windsor Hill and Aston Rowant. The AA/HRA concludes that due to distance and relatively low growth proposed in VAP, there would be no significant impact on designated sites.

Difficulties faced in carrying out the SA

- 2.14 Some difficulties were faced in carrying out the SA. An inherent difficulty in assessing a 'strategic' document was the relative lack of detail for some of the options or policies considered. This made it difficult to determine the effects for some of the SA objectives because of the uncertainty about how it would be implemented. For example it was difficult to determine the effects of policies and options which considered the scale of housing development without greater detail about the locations of the housing. This is indicated in the SA matrices as having an 'uncertain' impact against SA objectives. The impacts will be described in more detail when details about sites are known, therefore if site allocations are made then a further SA will be carried out.
- 2.15 Assessing policies on a strategic scale with such wide-ranging implications makes it difficult to assess the significance of effects, but nonetheless the SA has proved to be a useful tool in raising awareness of potentially significant effects to inform the content of VAP.

www.aylesburyvaledc.gov.uk/planning-building/planning-policy/what-is-the-vale-of-aylesbury-plan-/sustainability-appraisal/sustainability-appraisal-stage-1/

⁸ http://committees.aylesburyvaledc.gov.uk/committees/committees.aspx?commid=74&meetid=1343

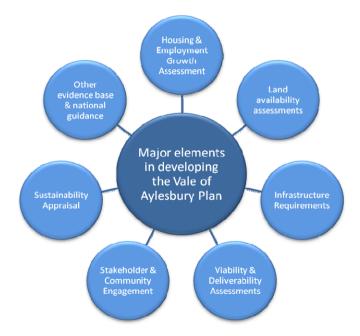
www.aylesburyvaledc.gov.uk/local-development-plans/planning-policy/vale-of-aylesbury-plan-/sustainability-appraisal/

2.16 There were also some gaps in the baseline data, or the data was a few years old, and this will be kept under review through the monitoring of the Plan.

3 – The Vale of Aylesbury Plan Strategy (VAP)

3.1 The VAP is the core document for the overall planning for Aylesbury Vale District Council. It sets out the ambition and direction of future development for the district as a whole, which other strategies and delivery plans of the council and delivery partners should support. This includes proposals by development partners and in Neighbourhood Plans. Figure 3.1 shows the major elements of developing the VAP.

Figure 3.1 Major elements of developing the Vale of Aylesbury Plan



- 3.2 The VAP comprises a spatial vision, eight objectives, and thirteen strategic policies. It does not identify specific sites for development, but indicates where future development is expected to take place.
- 3.3 Box 3.1 summarises the strategic policies.

Box 3.1 Titles of strategic policies

- Sustainable growth for Aylesbury Vale
- 2. Spatial strategy for growth
- 3. Securing the delivery of infrastructure
- 4. Employment growth
- 5. Ensuring efficient and effective use of existing employment land
- 6. Vitality in town and local centres
- 7. Timely delivery of homes
- 8. Addressing local housing needs
- 9. Affordable housing
- 10. Affordable housing on rural exception sites
- 11. Environmental assets, heritage and green infrastructure
- 12. Sustainable construction and generation of renewable and low carbon energy
- 13. Localism and distinctiveness

4 – Sustainability context, baseline and objectives

4.1 This section summarises the main findings of the Scoping Report, which is provided in full at **Appendix A**.

Identifying other plans, programmes and strategies (Task A1)

"an outline of the contents, main objectives of the plan and *relationship* with other relevant plans and programmes"

(SEA Directive Annex I(a))

"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"

(SEA Directive Annex I(e)

- 4.2 The Scoping Report's analysis of policies, plans, programmes and strategies relevant to the VAP included:
 - an explanation of the methodology used;
 - a list of the documents reviewed; and
 - an overview of the key aims and objectives of these documents and their implications for the sustainability appraisal of the VAP.
- 4.3 Since the published version of the Scoping Report, the following significant policy changes have occurred:
 - The National Planning Policy Framework has been finalised and come into force, superseding all Planning Policy Guidance Notes (PPGs) and Planning Policy Statements (PPSs). It emphasises the role of planning in supporting economic development;

- The Localism Act 2011 has been passed, giving communities powers to produce Neighbourhood Plans;
- The Government remains committed to abolishing Regional Spatial Strategies but following legal challenges this has still not happened;
- The following technical evidence documents have been published or due to be published in September-October 2012:
 - Growth Assessment study prepared by GL Hearn
 - A Strategic Housing Market Assessment (SHMA)
 Validation Study prepared by GL Hearn
 - An employment land study audit update by GL Hearn and AVDC
 - A Strategic Housing Land Availability Assessment (SHLAA) by AVDC
 - A Strategic Flood Risk Assessment (Level 1) by AVDC, approved by the Environment Agency
 - A Water Cycle Strategy by Halcrow
 - A Leisure and Cultural Facilities Study by Torkildsen Barclav
- 4.4 Table 4.1 (overleaf) summarises, by SA objective, the key aims of the policy documents reviewed, and how the VAP could help.

Table 4.1 Key messages of policy review

SA objective	Policy aims and how the VAP can support them
1. Community wellbeing	Policy aims:
	How the VAP could help:
2. Health and equalities	 Policy aims Improve health and well-being Reduce poverty and health inequalities Support active lifestyles and active travel Provide opportunities for people to live healthier lives. Increase participation in sport and physical activity How the VAP could help Ensure new development is located and designed to provide attractive, accessible, safe environments Promote patterns of land use that make as many journeys as possible practicable on foot or cycle Promote walking, cycling and public transport Provide good levels of accessible high quality greenspace Ensure all residents have easy access to health facilities

SA objective 3. Design	Policy aims and how the VAP can support them Policy aims: Secure the highest possible design quality in existing places and new development How the VAP could help: Champion high quality sustainable design Encourage creation of place Keep development locally distinctive
4. Crime and safety	Policy aims Reduce crime and the fear of crime
	How the VAP could help: Through development, enable people to feel safe and secure, by: Reducing opportunities for crime and anti-social activity designing out the opportunities to commit crime.
5. Access and provision of services	Policy aims: ensure all residents can access services and facilities that are appropriate to their needs
	How the VAP could help: Ensure provision of appropriate facilities and services, where and when they are needed, including: • health • education • recreation and sport • community and leisure

SA objective	Policy aims and how the VAP can support them	
6. Access and	Policy aims:	
provision of green	Enable residents to access green infrastructure and open space	
infrastructure	 How the VAP could help: Reduce deficiencies and maintain and enhance the provision of community access to green infrastructure, in accordance with national standards, by:	
7. Retail	Policy aims:	
provision	 Enable all residents to buy goods as close to home as commercially practical Support a thriving retail sector 	
	How the VAP could help: Support and enhance retail and service provision in towns and villages, by: Improving their 'offer' and seeking to meet the different needs of their communities Enabling a range and mix of facilities and services proportionate to their role Ensuring visitor and residents needs are met	
8. Town & village centres	Note that the proof of the	

SA objective	Policy aims and how the VAP can support them
	 How the VAP could help: Encouraging the vitality and viability of town and village centres Maximising their potential to meet the needs of their communities Enabling the improvements of village centres Facilitating the regeneration of the District's Town Centres.
9. Workforce and skills	Policy aims: Provide jobs and education facilities that meets the needs of residents How the VAP could help: Through development, encourage and maintain an available and skilled workforce which: Meets the needs of existing and future employers Reduces skills inequalities Improves opportunities and facilities for all types of learning Helps address skills shortages
10. Employment and economy	Policy aims: Provide jobs and economic activity that meets the needs of residents
	How the VAP could help: Through development, promote economic growth and employment and provide • Appropriate types of employment • in appropriate locations • at the appropriate times

SA objective	Policy aims and how the VAP can support them
11. Employers and economy	Policy aims Help employers to develop enterprises and create jobs and prosperity in the District, especially for disadvantaged people Enhance employment opportunities for all
	 Ensure that development for enterprise and employment uses is in line with sustainability principles and respects the environment Secure accessible, efficient and competitive retail provision and support town centres
	 How the VAP could help: Ensure that there is a sufficient range and choice of land allocated for economic development and employment purposes in accessible locations Improve access to employment opportunities particularly for deprived communities Support the vitality, attractiveness and viability of centres, and regeneration of deprived areas

SA objective	Policy sims and how the VAR can support them
SA objective 12. Housing	Policy aims and how the VAP can support them Policy aims • Ensure that everyone has access to affordable good quality housing sufficient for their needs
	 How the VAP could help: Identify requirements for market and affordable housing, taking into account household projections Allocate land for housing, favouring the re-use of previously developed land and buildings within settlements before settlement extensions and new development around settlements with good public transport links Include policies for affordable and special needs housing (including Gypsies and Travellers) where there is identified need Indicate where developer contributions and/or community infrastructure levies will be expected towards infrastructure, facilities (including open space) and affordable housing
13. Best use of land	Policy aims: Minimise loss of biodiverse and bioproductive land to development Harness development to decontaminate and remediate damaged land where practicable;
	How the VAP could help: Promote re-use of existing buildings Develop on previously developed land Minimise development on high quality agricultural land.

SA objective	Policy aims and how the VAP can support them
14. Transport and travel	Policy aims: Reduce the need to travel Encourage people to do as much of their travelling as possible on foot and bicycle Support more sustainable modes eg train and bus Minimise car use
	 How the VAP could help: Foster improvements to transport facilities and services which maintain or improve accessibility to services and facilities Promote mixed use developments Ensure new development is located and designed to provide attractive, accessible, safe, secure and sustainable environments for everyone including people with special access requirements and those who do not have access to a private car Promote and safeguard opportunities for improved public transport and measures to assist pedestrians and cyclists Encourage modal shift to more sustainable forms of travel Enable key transport infrastructure improvements; Reduce the negative effects of transport on the environment and communities

SA objective	Policy aims and how the VAP can support them
15. Air	Policy aims:
Quality	 Minimise air pollution Minimise exposure to it, especially of vulnerable and disadvantaged people meet mandatory standards for air quality.
	 How the VAP could help: Include policies on the location of potentially polluting developments, make provision for types of development that may cause pollution and separate incompatible land uses. Locate development so as to minimise travel demand, particularly by cars and other motor vehicles, and where it is accessible by a range of forms of travel/transport, including walking, cycling, use of public transport and alternatives to movement of freight by road.
16. Landscape And Heritage	Policy aims Protect and enhance the landscape, townscape, historic environment and cultural heritage Promote access to and enjoyment of them
	 How the VAP could help: Include policies to protect the countryside (designated and undesignated) from inappropriate development Include policies to protect the quality and character of the landscape and townscape, and provide guidance on design, access, density, off-street parking and open space provision Avoid development of greenfield sites where possible and appropriate, by giving preference to the re-use of suitable previously developed land Promote good design and public art

SA objective	Policy aims and how the VAP can support them
17. Biodiversity	Policy aims: Protect and enhance biodiversity, natural habitats and wild fauna and flora, including (but not only): International, national and local designated sites; and Protected species and species and habitat types identified as priorities for biological conservation
	 How the VAP could help: Include detailed policies for the conservation and, where appropriate, enhancement of international, national and local designated sites, reflecting their relative significance Undertake Appropriate Assessment in accordance with the requirements of the Habitats Directive (1.7) to assess the implications of the plan for European sites (including any in neighbouring authorities) whose integrity may be adversely affected by the plan Provide for the conservation and, where appropriate, enhancement of biodiversity outside statutorily designated sites, in particular identifying opportunities to conserve important local habitats and species, and to safeguard and manage landscape features of major importance for nature conservation
18. Flooding	Policy aims: Minimise the risk to people and property from flooding
	 How the VAP could help: Ensure that the location and design of new development has regard to the potential risk, causes and consequences of flooding Ensure that existing communities, infrastructure and other assets (including those alongside new developments) are considered with regard to potential risk, causes and consequences of flooding.

SA objective	 Policy aims and how the VAP can support them Consider additional flood risk assessments, mapping and related responsibilities that are emerging as the result of recent legislation
19. Water And Climate Change	Policy aims: Maintain, and where possible enhance, water quality & avoid water stress
	How the VAP could help: Meet the requirements of the Water Framework Directive Encourage reduction of water consumption Protect groundwater resources and abstractions Provide adequate water infrastructure to ensure the sustainable supply of water and the disposal of sewerage Ensure adaptation and reducing vulnerability to the
20. Energy And Climate Change	 impacts of climate change. Policy aims: Minimise emissions of greenhouse gases in the District and caused by activities and decisions in it; Maximise the resilience of residents, businesses and the natural environment to future climate change
	 How the VAP could help: Encourage sustainable, low carbon building practices and design Maximise the potential for renewable energy and reduce CO2 emissions through energy conservation Reduce emissions of greenhouse gases Maximise opportunities for recycling and minimising waste

Collecting baseline information (Task A2)

"The 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"

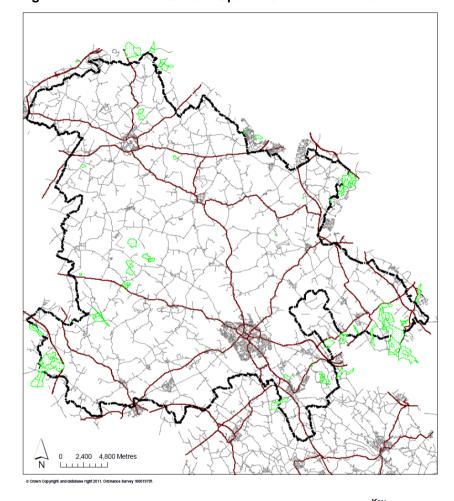
(SEA Directive Annex I(b and c))

4.5 Section 6 of the Scoping Report summarised the situation now and what would happen without the VAP, drawing on the District Wide Fact Pack¹⁰ and the documents listed in Annex A of the Scoping Report.

4.6 Key points include:

- Aylesbury Vale is a prosperous district, with low levels of deprivation and high proportion of higher status jobs, but still some pockets of deprivation;
- Housing is more affordable than in the peak a few years ago, but prices are still high compared to incomes;
- The population is projected to continue rising, implying challenging demands for extra housing;
- There is a significant shortage of affordable housing: more information on this is provided at Appendix E;
- The district includes part of a Special Area of Conservation, and many (mostly small) Sites of Special Scientific Interest, mostly in improving condition – see Figure 4.1;
- Accessibility is poor;
- High car use is causing air quality problems especially in Aylesbury town;
- Rivers and water resources are stressed because of population density, and projected increases in population and housing will worsen this;

Figure 4.1: Location of Sites of Special Scientific Interest

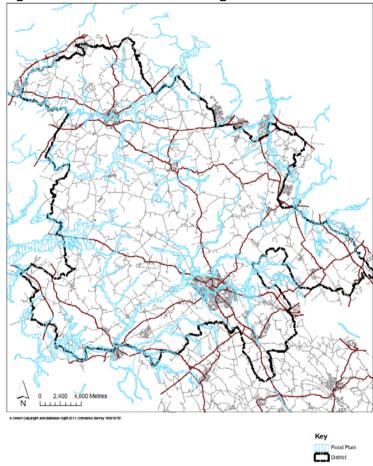


SSSI

¹⁰

- There are some areas of flooding in the district, particularly around the larger towns – see Figure 4.2
- The district has some valuable environmental heritage and recreational and cultural facilities, but access to green space is poor.

Figure 4.2 Areas at risk of flooding across the District



Identifying sustainability issues and environmental problems (Task A3)

Any existing environmental problems which are relevant to the plan 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

(SEA Directive Annex I(d))

4.7 Section 6 of the Scoping Report sets out the key issues affecting Aylesbury Vale. Table 4.2 summarises these.

Table 4.2 Sustainability issues affecting Aylesbury Vale

	<u> </u>
SA objective	Issues affecting Aylesbury Vale
1. Community wellbeing	 Aylesbury Vale's population grew by almost 8,400 (5%) between 2001 and 2011. The increase is forecast to continue.
	Ethnic minorities grew from 9.5% in 2001 to 13.5% in 2009.
	 The Growth Assessment (Hearns) projects that population is forecasted to increase to around 194,000 by 2031.
	 CLG household projections, again trend based, predict an increase in households of 13,300, from 72,100 to 85,400 over the same period.
	 Work is underway to refine these (trend based) projections, but it is clear there will be pressure for more housing than currently planned for.

SA objective	Issues affecting Aylesbury Vale
2. Health and equalities	 In 2010 the District's average deprivation level was in the top quarter (least deprived) in England. The Department of Health's Health Profile shows 80% of the Vale's residents live in areas among the least deprived 40% nationally, and none in the most deprived 20%. In 2008/09 13.6%, of residents participated in sport and active recreation, below Buckinghamshire's other districts and regional (17.1%) and national (16.6%) averages.
3. Design	 The District Council and English Heritage have funded improvements to buildings and shop frontages within Aylesbury's historic core, which has a designated conservation area and a number of listed buildings. Buckingham town centre also contains a wealth of historic buildings, and together with its medieval street pattern is recognised by English Heritage as an area of significant historic interest.
4. Crime and safety	Aylesbury Vale continues to be a relatively safe place to live. Rates of crime fell in 2010/11 compared with the previous year and remain below the Thames Valley average.
5. Access and provision of services	Aylesbury Vale ranked very poorly on a national measure of geographical accessibility of services (Indices of deprivation 2010).
6. Access and provision of green infrastructure	 Aylesbury Vale has a wide and varied network of GI. However it is the third worst district in the South East of England for access to greenspace, with 69% of households meeting none of the Accessible Natural Green Space requirements.
7. Retail provision	Aylesbury town centre hosts a range of major chain retailers, smaller shops and a variety of markets. Buckingham has a more specialist retail role.

 8. Town & village centres
and tourism functions.
9 Workforce A relatively high proportion of employees are
A rolatively high proportion of omployees are
and skills managers and senior officials and a relatively low
proportion in 'elementary occupations'.
Job Seeker Allowance claimants decreased 12% form 2 444 in lune 2000 to 2 434 in lune 2042
from 2,411 in June 2009 to 2,121 in July 2012,
proportionately in line with other Buckinghamshire districts.
Six areas in Aylesbury Vale are in the worst 10% in
England on the skills, education and training domain
of the Index of Deprivation 2010.
• Total employee jobs fell from 86,200 in 2007-2008
Employment to 70,000 in 2010 though the figures need to be
and economy treated with caution because of inconsistencies.
11. Employers and economy • 800 new enterprises were created 2010 for Aylesbury Vale and there were a total of 2,790
and economy Aylesbury Vale and there were a total of 2,790 enterprises for Buckinghamshire.
12. Housing • 80% of private properties were constructed after
1944 compared with 61% across England;
Affordable housing completions rose steadily from
73 in 2006/07 to 423 in 2009/10, dropped to 241 in
2010/11, but rose again to 439 in 2011/12.
The lower quartile house price in Aylesbury Vale is
currently £178,700;
Aylesbury Vale remains more affordable than
Buckinghamshire though in 2011, median house
prices were over 8 times median earnings;
In 2011 there were 3,700 households on the waiting list which has also and from 2010 whom the resulting
list, which has dropped from 2010 where there were 4,410 households on the council housing waiting list
4,410 households on the council housing waiting list 13. Best use of Most of the District is 3a/b agricultural land with
land pockets of grade 2 and some Grade 4. (See Map 1)
The District does not have a fundamental issue with
derelict or despoiled land.

SA objective	Issues affecting Aylesbury Vale
14. Transport and travel	 In 2001 43% of people in Aylesbury Vale travelled less than 5km to get to work. 70% travelled to work by car or van; Congestion is a problem: seven urban congestion management corridors, in addition to the town
	centre, area, have been identified in Aylesbury.
15. Air Quality	The main source of air pollution in the Vale is vehicle emissions.
	 Aylesbury has the lowest air quality in the district because of high volumes of traffic on radial routes to the town centre.
	The District has three Air Quality Management Areas, all on main roads in Aylesbury. Traffic generated by new developments will add to the problem.
16. Landscape And Heritage	Parts of Aylesbury Vale are in the Chilterns Area of Outstanding Natural Beauty or are designated Areas of Attractive Landscape or Local Landscape Areas.
	 The District has 9 nationally important parks and gardens of special historic interest. Waddesdon Manor, Stowe and Claydon House, all owned by the National Trust, attract large numbers of visitors. There are 120 Conservation Areas in 79
	settlements, around 2,900 listed buildings and 62 scheduled monuments.
	Two registered parks, two scheduled monuments and ten grade I or II* listed buildings are on English Heritage's at-risk register.

SA objective	Issues affecting Aylesbury Vale
17. Biodiversity	 Ashridge Commons and Woods, one of the sites that make up the Chiltern Beechwoods SAC, is partly within Aylesbury Vale. In 2011, 42% of its area was in 'favourable' condition and 58% in an 'unfavourable' condition.
	 There are 31 more SSSIs in or adjoining the District (see Map 2). Most are 'favourable' or 'unfavourable, recovering'; only 2 are 'unfavourable, declining'. The Vale has a large number of legally protected species, including bats and great crested newts, and Nature Reserves, Local Wildlife Sites (LWS), and Biological Notification Sites (BNS)
	 Many of these populations and sites are under recreational or development pressure.
18. Flooding	Historically Aylesbury and Buckingham have had significant flooding from main rivers. Map 3 shows areas at risk from flooding across the District.
19. Water And Climate Change	Aylesbury Vale's rivers have been consistently assessed as poorer in chemical quality than rivers in other districts in Buckinghamshire.
	 Aylesbury Vale falls within the Thames and South Chilterns areas. This area is identified as 'under high water stress' and further development will add to the pressure.
	Water quality is impacted by high population densities and transport pressures.
	 Problems in particular places include high phosphates, low flows and nutrient enrichment.
20. Energy And Climate	The Vale has higher than national average CO2 emissions.
Change	 Aylesbury Vale's recycling rate remains below other districts in the county with 22.0% of household waste recycled in 2010/11. The percentage of household waste recycled in South East England in 2010/11 was 41.3%.

Developing SEA and SA objectives (Task A4)

"the environmental protection objectives, established at international, Community or Member State 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"

(SEA Directive Annex I(e))

- 4.8 Sustainability Appraisal is an objectives-led process. This means that the potential effects of a plan are tested against a series of objectives, indicators and targets identified for the district to achieve sustainable development.
- 4.9 In previous SAs there has not always been sufficient detail to use each SA objective for the options. Now that the VAP is reaching its final stage, there is sufficient detail for the majority of objectives to be assessed.
- 4.10 Table 3 in section 9 of the Scoping Report sets out the sustainability appraisal framework. It consists of 20 topic 'headings', each of which is amplified by an 'objective' with a number (usually 3 or 4) of sub-objectives which aim to guide the assessment. Table 4.3 shows the 'SA framework' that has been used to identify the impacts of the emerging VAP.

Table 4.3 SA objectives and descriptions

1. Community wellbeing

Maximise the benefits and minimise the disbenefits of development on new and existing communities, through:

- enhancing community identity;
- creating new communities;
- and encouraging integration between communities.

2. Health and equalities

Through development, provide opportunities to improve people's health and well-being, in our town's and villages, by:

- improving access to housing, jobs, health and education:
- reducing inequalities and levels of deprivation;
- and providing opportunities so that people can live healthier lives.

3. Design

Through development, create sustainable communities by:

- a. championing high quality sustainable design;
- b. encouraging creation of place; and
- c. ensuring development is locally distinctive.

4. Crime and safety

Through development, enable people to feel safe and secure by:

- Reducing fear;
- Reducing opportunities for crime and anti-social activity in our towns and villages; and
- Designing out the opportunities to commit crime.

5. Access and provision of services

Through development, aim to ensure there are opportunities for people to obtain access to services and facilities that are appropriate to their needs by helping to provide:

- appropriate facilities and services;
- in appropriate locations;
- · at the appropriate times.

These should be well designed and inclusive and should include:

- health:
- education:
- recreation and sport;
- community and leisure; and other essential services.

6. Access and provision of green infrastructure

Through development, reduce deficiencies and maintain and enhance the provision of community access to green infrastructure, in accordance with national standards, by:

- protecting and improving the quality of existing green infrastructure & rights of way;
- increasing opportunities and access to green infrastructure;
- and encouraging the creation of new green infrastructure & rights of way.

7. Retail provision

Support and enhance retail and service provision in our town's and villages, by:

- improving their 'offer' and seeking to meet the different needs of their communities:
- enabling a range and mix of facilities and services proportionate to their role;
- · and ensuring visitor and residents needs are met.

8. Town and village centres

Support and enhance the role of town and village centres across the District, by:

- · encouraging their vitality and viability;
- · maximising their potential to meet the needs of their communities;
- enabling the improvements of village centres;
- and facilitating the regeneration of the District's Town Centres.

9. Workforce and skills

Through development, encourage and maintain an available and skilled workforce which:

- meets the needs of existing and future employers;
- reduces skills inequalities;
- improves opportunities and facilities for all types of learning;
- and helps address skills shortages.

10. Employment and economy

Through development, promote economic growth and employment and provide:

- · appropriate types of employment;
- in appropriate locations:
- at the appropriate times;

and in doing so aim to:

- enable growth and retention of existing businesses:
- foster new businesses to form;
- respond to the needs of different businesses; and
- maintain and support the district's diverse economy; whilst supporting its resilience, and
- promotes high quality design.

11. Employers and economy

Through development, aim to ensure there are opportunities for all employers to access facilities and services that are appropriate to their needs including:

- different types and sizes of accommodation;
- flexible employment space;
- high quality communications and infrastructure.

12. Housing

Through development, provide:

- · appropriate types of homes;
- · in appropriate locations;
- at the appropriate times;

And in doing so aim to ensure that everyone has the opportunity to live in a home that:

- is appropriate to their needs;
- they can afford;
- and of high quality design, and residents feel safe in.

13. Best use of land

Make the best use of land, through:

- re-using existing buildings;
- developing on previously developed land (PDL); and
- minimising development on high quality agricultural land.

In addition, avoid development on contaminated land where remediation is not possible.

14. Transport and travel

Enable improvements to transport infrastructure and transport choice, by:

- reducing the need to travel through encouraging more sustainable patterns of land use and development;
- encouraging modal shift to more sustainable forms of travel;
- enabling key transport infrastructure improvements;
- and reducing the negative effects of transport on the environment and communities.

15. Air quality

Through development, reduce the negative impacts of, and enable improvements to, air quality by:

- reducing negative effects on existing air quality management areas;
- reduce emissions of transport to help achieve national and international standards for air quality;
- and reduce the exposure of people to poor air quality.

16. Landscape and heritage

Through development, maintain, conserve and enhance the landscape, heritage and built character of our towns, villages, and countryside by:

protecting and enhancing designated and undesignated heritage and

landscape assets:

- protecting areas of sensitive landscape and minimising adverse impacts of development;
- maintaining historical, archaeological and cultural value and potential of assets; and
- increasing access to, enjoyment and understanding of, these assets, where this will not cause harm.

17. Biodiversity

Conserve and enhance biodiversity, including the need to avoid or mitigate the potential impacts of new development in the long term, by:

- managing natural habitats and wildlife;
- enabling opportunities for greater biodiversity;
- protecting the integrity of European sites and other designated sites for nature conservation;
- increasing access to, enjoyment and understanding of, these assets, where this will not cause harm; and
- encouraging the creation of new (or replacement) habitats and features for wildlife.

18. Flooding

Through development, reduce the risk of flooding in our town's and villages, by:

- minimising the risk of flooding to people and property;
- reducing the risk to those areas susceptible to flooding;
- managing flood risks appropriately both now and in the long-term; and
- ensuring provision of sustainable urban drainage.

19. Water and climate change

Through development, maintain, and where possible enhance, water quality & avoid water stress, by:

- meeting the requirements of the Water Framework Directive;
- · encouraging reduction of water consumption;
- protecting groundwater resources and abstractions;
- providing adequate water infrastructure to ensure the sustainable supply of water and the disposal of sewerage; and
- ensuring adaptation and reducing vulnerability to the impacts of climate change.

20. Energy and climate change

Through development, reduce contributions to climate change by:

- encouraging sustainable, low carbon building practices and design;
- maximising the potential for renewable energy and reduce CO2 emissions through energy conservation;

- reducing emissions of greenhouse gases: and
- maximising opportunities for recycling and minimising waste.

5 – Sustainability appraisal of VAP vision and objectives

"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"

(SEA Directive Annex I(f))

"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"

(SEA Directive Annex I(g))

- 5.1 This is the first of three chapters which appraise, respectively, the sustainability impacts of the VAP's vision and objectives, strategic options considered for the VAP, and VAP policies. The SA framework of Table 4.3 was used as the basis for each appraisal. For the strategic options, the appraisal helped to inform the decision of which options to choose. For the vision, objectives and strategic policies, the appraisal helped to fine-tune each element of the VAP.
- 5.2 For the rest of this report, the appraisal of the VAP vision, objectives, options and policies is in comparison with the baseline situation in July 2012. The following scoring system is used:

Key to Impacts:

110) 10 111-100101							
Major positive	Minor positive	Neutral					
++	+	0 or +/-					
Uncertain impact	Minor negative	Major negative					
?	-						

5.3 'Mitigation measures' refer to measures that are already in the draft VAP in the form of other objectives or policies. 'Recommendations' are suggestions for improvements to the VAP.

- 5.4 A number of assumptions were made when carrying out the assessment as the policies are still relatively high level, with the detail to come later in the Vale of Aylesbury Plan: Delivery policies or other local policy documents such as Neighbourhood Development Plans.
 - The higher the number of homes, the more funding will be available via developer contributions or community infrastructure levy, therefore more money for infrastructure and community facilities.
 - Higher number of homes are likely to improve access to housing, although not necessarily affordability.
 - At the stage of site specific allocations in subsequent VAP or other policy documents (such as Neighbourhood Plans) then other assessments will be undertaken such as Transport Impact Assessments, Landscape and Visual Impact Assessment, and appropriate assessment (for sites of international nature conservation importance).
 - VAP delivery policies will include more detail about environmental protection and mitigation measures such as: requiring individual proposals to follow the Council's advice in the Strategic Flood Risk Assessment on location with regard to flood zones, mitigation measures and sustainable drainage systems; considering the cumulative impact of development and site-specific mitigation; potential for green travel plans, contributions to improving public transport and provision of secure walking and cycling access; reducing greenhouse gas emissions including measures to support sustainable design, energy efficiency, renewable energy in housing and other developments, sustainable construction, sustainable transport and sustainable waste management.
 - Pollution control and other regulatory functions of the council and Environment Agency are dealt with under the appropriate regimes, such as environmental health.

Appraisal of the VAP vision

- 5.5 The SA of March 2012 appraised a draft version of the VAP objectives, and found that, together, they covered the full range of SA objectives. Table 5.1 shows the findings of an appraisal of the VAP vision, which was undertaken by the district planners in September 2012. More information is provided at **Appendix F**. The table shows that:
 - Overall the vision positively addresses the SA objectives.
 - Given that the plan is economic driven, a number of employment led objectives achieve a double positive '++'.
 - Each part of the vision positively addresses the SA objectives for 'community wellbeing' and 'health and equalities'.
 - · Access and provision of services has also scored highly.
 - The vision scored less highly for the environmental impacts. This is because the overarching vision for VAP is to deliver growth, which is likely to have a negative impact on the natural environment. However, there are a number of mitigation measures which can be used to reduce these impacts as set out below, which should be incorporated into the policies. These include:
 - The use of Sustainable Urban Drainage systems to reduce the risk of flooding and simultaneously deliver green infrastructure where possible.
 - The use of sustainable construction methods and standards to reduce carbon emissions, energy, water and resource use.
 - Provision of offsite contributions to enhance habitats, biodiversity, cultural and heritage and assets.

Table 5.1 Appraisal of VAP vision

SA Objective	Vision component								
	A)	B)	C)	D)	E)	F)	G)	H)	I)
1. Community wellbeing	+	+	++	++	+	++	+	+	+
2. Health and equalities	+	+	++	++	++	++	+	+	+
3. Design	+	0	++	0	0	0	++	0	++
4.Crime and safety	+	0	++	++	0	0	+	+	0
5. Services	++	++	++	+-	+	++	++	+	++
6. Green Infrastructure	+-	++	0	0	0	+	++	0	++
7. Retail provision	+	0	0	0	0	+	++	+	0
8. Town and village centres	+	+	0	0	0	0	++	++	0
9. Workforce and skills	+	++	0	0	++	0	++	++	0
10. Employment and economy	++	++	0	0	+	0	++	++	++
11. Employers and economy	++	++	0	0	+	+	++	++	++
12. Housing	++	+	++	0	0	0	0	+	+
13. Best use of land	++	0	0	+	0	0	++	++	+
14. Transport and travel	+-	+	+	0	0	+	++	+	0
15. Air quality		0	+-	0	0	-	0	-	
16. Landscape and Heritage	0	-	0	0	0	-	-	-	+-
17. Biodiversity	-	0	-	0	0	0	0	-	+
18. Flooding	0	++	+	0	0	0	+	-	-
19. Water and climate change	-	+?	0	0	0	0	0	-	-
20. Energy and climate change	-	0	+?	0	0	0	0	-	-

The sustainability appraisal made a range of recommendations for improving the sustainability of the VAP vision. These are shown at Table 5.2, along with information about changes to the VAP made in response to these recommendations.

Table 5.2 Recommendations on the VAP vision made by the sustainability appraisal

Recommendation	Reason for the recommendation	Planning team's response			
Include reference in the vision to green infrastructure, water and air quality	The vision is very economically and socially focused, with little emphasis on the third dimension of sustainable development, the environment.	Policy has been reword to 'This includes improvement to transport, education, health, green infrastructure, community facilities, water and air quality and flood protection measures.'			
Add reference to high quality design for Buckingham	Consistency between the plan sub-areas	The wording of part H of the vision has been reword to include 'well-designed, connected, healthy, safe and integrated extensions to the town'. Also well designed developments with strong place shaping principles is incorporated into part C of the vision which is for all areas of the district.			
Add reference to provision of 'safe		It was decided not to include this as planning			

Recommendation	Reason for the recommendation	Planning team's response
communities' in rural areas		for 'safe communities' is all ready identified in part C which is applicable to all areas 'strong place-shaping, community safety and sustainability principles will create well design developments'. Also community safety is not a particular issue for rural areas. It is more so for Aylesbury.
Add reference to Green Infrastructure for Buckingham		It was decided not to specifically include green infrastructure as this is incorporated into the existing statement of 'There will be further investment in infrastructure'. Also green infrastructure is incorporated into part B which is applicable to all areas.
Add reference to retail provision	Retailing is a specific SA objective, although this isn't specifically identified in the vision.	Part A of the vision has been reword to include 'the main town centres at Aylesbury and Buckingham will enjoy a renaissance in retailing services'.
Include reference to retaining existing businesses	Part A of the vision only promotes new businesses but	Part A of the vision has been reworded to include 'growth will

Recommendation	Reason for the recommendation	Planning team's response
	doesn't include retaining existing businesses which is also important to support economic growth.	provide a diverse and flexible range of business premises and opportunities for new and existing employment'.
Include access to high quality communications infrastructure	This has been identified as a particular issue for employment growth, particularly in rural areas.	It was decided not to specifically include reference to communication infrastructure as this is incorporated as part of the general references to infrastructure.
Refer to providing housing for the right type, location and time for the district	To clarify types location and timing for housing delivery.	These details have not been identified as it is too detailed for VAP: Strategy. VAP: Delivery will identify further details for this.
Include reference to transport in rural areas.	Transport infrastructure is a particular issue in rural areas	It was decided not to make a specific reference in the rural areas part of the vision as transport infrastructure is identified in part B which is applicable to all areas of the district.
Add reference to modal shift/sustainable transport patterns for part B of the vision.	Also though there is reference to transport infrastructure, encouraging a	Part B has been reworded to 'improvement to transport, including delivering a modal shift.

Recommendation	Reason for the recommendation	Planning team's response
	model shift is	
	different as it is	
	trying to change	
	behavioural	
	patterns.	

Appraisal of the VAP objectives

- 5.7 Table 5.3 shows the findings of an appraisal of the VAP vision, which was undertaken by the district planners in September 2012. More information is provided at **Appendix F**. The table shows that:
 - Combined, the strategic objectives appear to help meet each of the sustainability appraisal objectives.
 - Overall, the strategic objectives most positively support the sustainability appraisal objectives related to the economy, community wellbeing, access and provision of services, and town and village centres. These strategic objectives all contribute positively to each of the sustainability appraisal criteria.
 - Every strategic objective supports the delivery of at least four SA objectives.

Table 5.3 Sustainability appraisal of VAP objectives

	VAP objective							
SA objective	1)	2)	3)	4)	5)	6)	7)	8)
1. Community wellbeing	+	+	++	+	+	+	+	+
2. Health and equalities	+	++	+	++	+	+	+	++
3. Design	0	0	+	0	++	++	++	0
4.Crime and safety	0	+	0	0	+	+	+	+
5. Services	0	++	0	+	++	0	0	+

6. Green Infrastructure	+/-	+	+/-	0	0	+	+	+
7. Retail provision	+	+	0	+	+	0	0	0
8. Town and village centres	+	+	+	++	++	+	0	+
9. Workforce and skills	+	++	+	0	0	0	0	+
10. Employment and economy	++	+	0	+	+	+	+	+
11. Employers and economy	++	+	0	+	+	+	+	+
12. Housing	+	+	++	+	0	+	+	0
13. Best use of land	0	0	0	+	+	++	+	0
14. Transport and travel	+	++	0	+	0	0	0	0
15. Air quality	-	-	-	0	-	-	0	0
16. Landscape and Heritage	-	-	-	0	0	++	+	0
17. Biodiversity	-	-	-	+	0	++	0	0
18. Flooding	-	1	-	+	+	+	++	0
19. Water and climate change		0	1	+	0	0	++	0
20. Energy and climate change	-	0	-]	+	0	0	++	0

- The weakest compatibility is with the SA objective on reducing crime and safety. Strategic planning policies aim to address strategic level issues, and more site-specific issues such as crime and safety will be addressed in VAP delivery or other delivery policy documents.
- There are potential conflicts with some of the environmental SA objectives. In particular the objectives for housing and economic growth could conflict with the protection of the Vale's landscape, biodiversity and ability to meet future climate change targets for reducing greenhouse gases.

- Some conflict with the SA objectives will be inevitable due to the amount of growth planned for, although overall this is likely to bring social and economic benefits. In part, this will be mitigated by strategic objectives to enhance the built, historic and natural environment, as well as policies VS2 'spatial strategy for growth', and VS10 'protecting our high quality environment, and natural resources'. The SA for these policies will identify recommendation to further strengthen these policies. Other mitigation measures already in the VAP include:
 - The use of Sustainable Urban Drainage systems to reduce the risk of flooding
 - The use of sustainable construction methods to reduced carbon emissions, energy, water and resource use
 - Use of green travel plans and contributions improved public and sustainable transport can help to secure climate change and air quality benefits
 - Provision of offsite contributions to enhance habits, biodiversity, cultural and heritage and assets
- 5.8 Again, the sustainability appraisal made recommendations for improving the sustainability of the VAP objectives. These are shown at Table 5.4, along with information about changes to the VAP made in response to these recommendations.

Table 5.4 Recommendations on the VAP objectives made by the sustainability appraisal

Recommendation	Reason for the	Planning team's
	recommendation	response
Objective 1- Identify appropriate types, location and timing of employment development	To clarify appropriate types, location and timing of employment development	This level of detail is too specific for the VAP: Strategy document. These details will be picked up in the VAP: delivery policies.
Objective 1 - Reword to include 'promote	To ensure employment growth	Objective 1 has been reworded to include pro-

Recommendation	Reason for the recommendation	Planning team's response
sustainable economic growth'	occurs in sustainable locations.	active approach to promote sustainable economic development'.
Objective 2 – Include reference to green infrastructure	Green infrastructure is linked to health and good quality of life	Policy has been rewording to include 'Provision for open space and leisure including green infrastructure'.
Objective 2 - Include enhanced public transport, traffic management, cycling and walking	To support the issue of trying to create a modal shift from the private car to more sustainable forms of transport.	Policy has been reworded to 'Provision of transport facilities; including; enhanced public transport, traffic management, cycling and walking'.
Objective 2 - Include reference to high quality communications	This is a specific issue identified for the district.	Objective 2 has been amended to include 'provision for utilities including telecoms'.
Objective 3 – Include a statement on Gypsies and Travellers	Gypsies and Travellers are a group that requires special consideration in housing provision	It has been decided not to specifically mention gypsies and travellers as their needs will be catered for in the existing objective 'a mix of house sizes and types to meet identified needs'
Objectives 5 and 8 – Rephrase as "The Council will promote" or similar	The current wording is inconsistent with that of the other policies	Objective 5 and 8 have been amended to start with 'the council will promote'.

Recommendation	Reason for the recommendation	Planning team's response
Objective 6 – Add 'to build at appropriate densities'	No part of the objective mentions density requirements although indirectly mentioned through high quality design.	Objective 6 now includes 'high quality design and build at appropriate densities'.
Objective 6 – Make specific reference to landscape and biodiversity	Protection and enhancement of landscape is a key environmental objective, which had not been mentioned in the objectives	Objective 6 has been reworded to 'The Council will manage development in a way that ensures the protection and enhancement of the built, historic and natural environment and landscape and biodiversity habitats in Aylesbury Vale'.
Objective 8 – reword 'specifically at Aylesbury' so that it applies to the whole district	Objective 10 is partly specific to Aylesbury town for addressing pockets of deprivation and health inequalities, therefore not as strong as it could be for SA objective '2. Health and Equalities'.	Objective 10 has been reworded to 'address pockets of deprivation and health inequalities especially within Aylesbury town'.

6 – Sustainability appraisal of VAP options

"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"

(SEA Directive Annex I(f))

"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"

(SEA Directive Annex I(h))

- 6.1 The SEA Directive requires an environmental report to describe and evaluate the environmental impacts of the plan 'and reasonable alternatives taking into account the objectives and the geographical scope of the plan' (Article 5.1), and to include 'an outline of the reasons for selecting the alternatives dealt with' (Annex Ih).
- 6.2 Alternative options were considered in developing the VAP:
 - Jobs and housing levels including the proportion of affordable housing, and housing apportionment scenarios for the District;
- 6.3 There was also other consultation on options / alternatives, but not with an SA. The following additional consultation processes were undertaken:
 - Stakeholder forums in March 2012 which considered the Vision and Objectives (called 'aims' at the time).
 - Town and parish 'Community View' which consider community aspirations future jobs, infrastructure, homes and issues facing parishes.

Jobs and housing levels, and housing apportionment

- 6.4 Three rounds of sustainability appraisal on different levels of jobs and housing, and broadly where they should be located ('apportionment') have been carried out prior to this SA report: in December 2011 (Appendix B), March 2012 (Appendix C) and July 2012 (Appendix D).
- 6.5 The first sustainability appraisal, published in December 2011, considered the impacts of seven options. These were based on a housing and economic growth assessment, which concluded that the district's housing range lies between 500 and 13,500 new homes, and its employment between 5,000 and 12,000 new jobs. Table 6.1 shows the options considered. Zero net migration was not felt to be reasonable and so was removed from further analysis early on.

Table 6.1 Projected levels of growth 2011 - 2031, December 2011

Projection	Jobs growth	Homes growth*	Based on
A. Zero net migration	-5,000	500	In and out migration levels set at the same level (GL Hearn)
B. Zero employment growth	0	4,400	Maintaining existing employment levels but assuming no new employment (meeting identified housing needs) (GL Hearn)
C. Trend based population (10 yr)	900	5,100	Past 10 year average of population change (GL Hearn)
D. Trend based population (5 yr)	2,100	6,000	Past 5 year average of population change (GL Hearn)
E. Government forecasts	4,120*	7,900	ONS/CLG population and household forecasts (2008)
F. Economic trend (Cambridge)	7,800	10,100	Cambridgeshire Econometric projection
G. Economic trend (Experian) * in addition to delivered	12,000	13,500	Experian business systems projection

^{*} in addition to delivered and delivery pipeline

- 6.6 To simplify the appraisal and subsequent consultation, four assessment ranges were devised:
 - A. 0-3,000 jobs and 4,500-6,750 homes
 - B. 3,000-6,000 jobs and 6,750-9,000 homes
 - C. 6,100-9,100 jobs and 9,000-11,250 homes
 - D. 9,100-12,000 jobs and 11,250-13,500 homes
- 6.7 The appraisal assumed that the impacts, both positive and negative, of higher levels of development would be higher than those of lower levels of development, that lower levels of development are likely to take the form of smaller sites spread across the district, and that higher levels of development are likely to be a mix of smaller sites spread across the district and a limited number of larger sites.
- 6.8 Table 6.2 summarises the appraisal findings. The more social objectives (community wellbeing; health and equalities etc.) and economic objectives (workforce & skills, employment and economy) were more likely to have negative impacts under lower levels of development and positive effects under higher levels. In contrast, the more environmental objectives (best use of land; air quality; landscape and heritage etc.) were more likely to have neutral or minor negative effects under low levels of development, and significant negative effects under high levels of development.

Table 6.2 Sustainability appraisal of employment and housing range, December 2011

Sustainability Appraisal Objective	Employment and Housing Range				
	A Jobs 0-3,000 Homes 4,500- 6,750	B Jobs 3,000- 6,100 Homes 6,750- 9,000	C Jobs 6,100- 9,100 Homes 9000- 11,250	D Jobs 9,100- 12,000 Homes 11,250 – 13,500	
1. COMMUNITY WELLBEING	(2)	+	++	+	
2. HEALTH AND EQUALITIES		-	+	++	
3. DESIGN					
4. CRIME AND SAFETY					
5. ACCESS AND PROVISION OF SERVICES		-	+	++	
6. ACCESS AND PROVISION OF GREEN INFRASTUCTURE	0?	-	-	-?	
7. RETAIL PROVISION	0	+	+	++?	
8. TOWN & VILLAGE CENTRES		+	++	++	
9. WORKFORCE & SKILLS		-	+	++	
10. EMPLOYMENT AND ECONOMY	-	-	+	++	
11. EMPLOYERS AND ECONOMY					
12. HOUSING	-	-	+	++	
13. BEST USE OF LAND	0?	-	?	?	
14. TRANSPORT AND TRAVEL	1.00	?	-?	-?	
15. AIR QUALITY	0?	-	-	?	
16. LANDSCAPE AND HERITAGE	0?	-	-	-	
17. BIODIVERSITY	0?	-	-	?	
18. FLOODING					
19. WATER AND CLIMATE CHANGE	0?	-	-	?	
20. ENERGY AND CLIMATE CHANGE	0?	-	-	?	

- 6.9 The SA also considered a range of options for housing apportionment. Table 6.3 shows the apportionment scenarios considered, Table 6.4 shows where within the district new housing might be sited under the different apportionment scenarios, and Table 6.5 shows the housing numbers associated with the highest, medium and lowest percentage points in Table 6.4.
- 6.10 **Appendix B** shows the appraisal findings for each housing market. Again, the social and economic objectives were more likely to be negatively affected under lower levels of development and positively affected under higher levels, whereas the environmental objectives were more likely to have neutral or minor negative effects under low levels of development, and significant negative effects under high levels of development.

Table 6.3 Apportionment scenarios, December 2011

Table 6.5 Appoi	Table 6.5 Apportionment scenarios, December 2011					
Approach	Origin					
Continue Past Trends	Distributes growth as for the past 10 years of completions & the existing delivery pipeline. Based on AVDC monitoring of parish by parish begins completions and begins trained by					
2. Economic Led	parish-by-parish housing completions and housing trajectory Based on figure 18.5 of the Growth Assessment for Projection 5 (Cambridge Econometrics Projection).					
3. New Settlement Concentration	Based on 'Eco Towns: A supplement to PSS1' the theoretical new settlement would provide at least 5,000 new homes, with the remainder of growth in the four submarkets attributed on the same percentage basis as the past trends above.					
4. Population & demogr. change	Based on figure 18.5 of the Growth Assessment for Projection 1 (main trend based population projection).					
5. Housing Need	Based on figure 6.19 from Growth Assessment to meet the need for affordable housing (net 5 year).					
6. Maintain working age population	Based on figure 18.5 from the Growth Assessment Projection 4 (Zero Employment Growth) aiming to maintain the working age population across the district.					
7. Urban Concentration	Based on averaging delivery of housing in line with AVDLP policy (table 2,3 and 4 AVDLP), and South East Plan policy MKAV1 used as the basis of the apportionment (less the SW MK expansion area, as this was a unique feature of the plan based on a higher than now proposed housing figure for MK).					

Table 6.4 Apportionment scenarios, December 2011

Housing market: Apportionment scenario:	Northern Vale (exc Buckingham sub market)	Buckingham sub market	Southern Vale (exc Aylesbury sub market)	Aylesbury sub market	New undefined location
Continue past trends	12%	12%	17%	59%	1
2. Economic led	18%	6%	32%	44%	1
3. New settlement concentr.	7%	7%	10%	34%	42%
4. Population & demographic	12%	11%	21%	56%	1
5. Housing need	15%	10%	15%	60%	-
6. Maintaining working age	21%	9%	36%	35%	-
7. Urban concentration	5%	10%	7%	78%	-

Table 6.5 Housing markets: high, mid-point and low numbers (and percentages from Table 6.4), December 2011

		,,			
	Northern Vale (exc Buckingham sub market)	Buckingham sub market	Southern Vale (exc Aylesbury sub market)	Aylesbury sub market	New undefined location
Low	100	0*	200	0*	5,000
	(5%)	(6%)	(7%)	(34%)	(42%)
Mid-point	2,200	700	3,550	5,500	6,850
	(13%)	(9%)	(21.5%)	(56%)	(42%)
High	3,900	1,400	6,900	11,100	8,700
	(21%)	(12%)	(36%)	(78%)	(42%)

^{*} Figures are actually a negative as development is already permitted

- 6.11 The consultation document and SA/SEA were made available for consultation from December 2011 to January 2012. The consultation comments are shown at **Appendix C**. Preference for housing numbers was polarised between the public which favoured the lower end of the options (A, B), parish and community groups which tended to favour lower and middle ranges, and developers/ landowners who strongly favoured the highest range consulted on (or even higher levels of development), with a strong resistance to the lowest range.
- 6.12 There was no clear consultation preference regarding housing apportionment except for a large majority rejection of the option for a new settlement. The public tended to support options that did not focus so strongly on Aylesbury, whereas developers/landowners tended to support urban concentration and economic led options.
- 6.13 Following the consultation, a Sustainability Appraisal Addendum (**Appendix C**) was produced in March 2012. This responded to consultation comments on the December 2011 SA. It appraised the impact of providing 9,000 new homes, with an apportionment of:
 - Aylesbury: 6000 new homes to 2031 (300 per year) or 66% of district total
 - Remaining rural south: 1000 (50) or 11%
 - Buckingham: 1000 (50) or 11%
 - Remaining rural north 1000 (50) or 11%.
- 6.14 The March 2012 SA found that, since both the proposed housing numbers and the proposed allocations were within the ranges previously appraised in the December 2011 SA, no new appraisal was necessary.
- 6.15 A Cabinet meeting of 15 May 2012¹¹ considered further technical work, the SA information, responses from stakeholders and members, and the newly-published National Planning Policy Statement which reinforced the message of localism. Cabinet decided to narrow down

the range being considered in order to better focus the technical work and testing. The preferred option identified was 9,000 homes +/- 10%. 9,000 is generously above the level of growth needed for the district to meet its own needs (estimated as 4,500). An alternative figure of 6,000 was put forward to Cabinet but ultimately the 9,000 was agreed.

- 6.16 Cabinet agreed a broad apportionment for growth alongside the figure of 9,000 homes as follows (growth delivered through VAP only, excluding existing commitments)¹²:
 - Aylesbury: 5800 new homes to 2031 or 64% of district total
 - Remaining rural south: 1300 or 14%
 - Buckingham: 1000 or 11%
 - Remaining rural north 900 or 10%.
- 6.17 The approach was based on distributing housing growth to the most sustainable locations, taking into account existing and known commitments for services and infrastructure provision, as well as environmental constraints, and linking it to the distribution of jobs.
- 6.18 Cabinet then immediately decided to review the decision to more fully consider issues relating to the continuing economic downturn, infrastructure requirements and viability, the weight which should be given to the responses from local communities to the consultation on possible growth levels and apportionment, and the implications of recent decisions on major development sites at Strategic Development Control Committee.
- 6.19 In addition, new technical evidence was prepared, including:-
 - An employment land study audit update by GL Hearn and AVDC
 - A Strategic Housing Land Availability Assessment (SHLAA) by AVDC and agreed by a SHLAA Steering Group
 - A Strategic Flood Risk Assessment (Level 1) by AVDC signed off by the Environment Agency

 $[\]underline{\text{http://committees.aylesburyvaledc.gov.uk/committees/committees.aspx?commid=74\&meetid=} \\ \underline{1343}$

¹² See Stage 1 consultation document Figure 1 for list of parishes within each housing market area http://www.aylesburyvaledc.gov.uk/local-development-plans/planning-policy/vale-of-aylesbury-plan-documber-2011/

- A Water Cycle Strategy by Halcrow audited by AVDC and stakeholders
- A Leisure and Cultural Facilities Study by Torkildsen Barclay, audited by AVDC
- A Strategic Housing Market Assessment (SHMA) prepared by GL Hearn, audited by AVDC and produced in consultation with adjoining districts
- Duty to cooperate statement, which confirms that no neighbouring authorities have identified an immediate requirement for expansion of new housing into Aylesbury Vale District Council.
- 6.20 This new evidence was reflected in a third round of SA, of July 2012 (Appendix D). The July 2012 SA tested the revised figures for considering the impacts of 6000 as well as 9000 new homes and apportionment option. This significantly affected the original SA conclusions, to help inform the Cabinet decision, with an apportionment as per Table 6.7.

Table 6.7 Apportionments considered in the July 2012 SA

Settlement	Based on a of 9,000	district total	Based on a conference of 6,000	district total
	Additional homes to 2031	% of district total	Additional homes to 2031	% of district total
Aylesbury Urban Area made up from:	5575	64	3270	54
 Aylesbury East 	2400		2450	
MDA	3175		820	
Other brownfield & greenfield sites				
Buckingham	1000	11	700	12
Winslow	400	4	400	7
Haddenham	200	2	100	2
Wendover	40	0.4	30	0.5
Larger Villages	1114	12	850	14
Smaller Villages	671	7	650	11

- 6.21 The proposed new apportionment reflected the consultation responses to the December 2011 on the VAP, as well as:-
 - The Council's 'minded to approve' resolution in March 2012 for development at Aylesbury East for 2,450 homes
 - The housing numbers suggested in December consultation by Buckingham, Haddenham and Wendover town and parish councils
 - The housing numbers suggested by Winslow Town Council, with an additional 200 dwellings conditional on delivery of East-West Rail at Winslow (assumed operational date 2021).
- 6.22 Table 6.8 shows the appraisal findings for the lower and higher growth levels considered in the SA. No appraisal was carried out against the SA objectives of design, crime/safety, and employers/ economy, since these were considered to have similar impacts regardless of the options chosen. Since the housing and employment growth ranges considered in the July 2012 were within those previously assessed in December 2011, no further major SA issues have been identified.
- 6.23 The July 2012 SA concluded that keeping the main focus of housing growth at Aylesbury, as the district's only major town, would help to focus development where there is the highest levels of infrastructure, and the limited growth apportioned to other parts of the district could still help to ensure that resources are not over-stretched and will help to address other sustainability issues in other parts of the district such as provision of affordable housing in rural areas. Regarding the Northern Vale housing market, the SA raised issues of health deprivation, and poor access and provision of services and green infrastructure.
- 6.24 Flood risk was not appraised in the December 2011 SA on the basis that no detail was provided for sites or areas of settlements to be considered, but was appraised in the July 2012 SA. The July 2012 SA concluded that there would be greater potential threat to locations susceptible to flooding from built development of 9000 rather than 6000 homes.

- 6.25 For green infrastructure, the SA weighted the potential to create new publicly accessible green spaces against the threat of new housing sites replacing existing green infrastructure, and found that there would be a greater negative impact from more housing. Lower development levels were found to have neutral (but uncertain) impacts for biodiversity, air quality, landscape, water and climate change, and energy and climate change. The July 2012 SA concluded that, in light of the emerging technical evidence, 6000 homes/6000 jobs would have less harmful impacts overall than 9000 homes/6000 jobs.
- 6.26 Table 6.9 shows the appraisal findings by individual sub-market area. They broadly reflect the findings for the district as a whole.

Table 6.8 Appraisal of 6000 v. 9000 new homes, July 2012

•	Level of growth	
	6000 Jobs/	6000 Jobs/
SA objective	6000 Homes	9000 Homes
1. Community wellbeing	+	++
2. Health and equalities	0	+
5. Access & provision of services	0	+
6. Access & provision of green infrastr.	0?	-
7. Retail provision	0	+
8. Town and village centres	-	+
9. Workforce and skills	+	+
10. Employment and economy	+	+
12. Housing	+	++
13. Best use of land	-?	-
14. Transport and travel	-	?
15. Air quality	0?	-
16. Landscape and heritage	0?	-
17. Biodiversity	0?	-
18. Flooding	-	?
19. Water and climate change	0?	-
20. Energy and climate change	0?	-

Table 6.9 Appraisal results for individual sub-markets

	Low growth	High growth
Aylesbury	3270 homes	5575 homes
Community Wellbeing	0	+
2. Health and Equalities	0	+
5. Access & Provision of Services	0	+
6. Access & Provision of Green Infrastr	+	+
7. Retail Provision	0	+
8. Town and Village Centres	0	+
Workforce and Skills	0	+
10. Employment and Economy	0	+
12. Housing	+	++
13. Best Use of Land	0	-
14. Transport and Travel	-	-
15. Air Quality	0	-?
16. Landscape and Heritage	0	-?
17. Biodiversity	0	-?
18. Flooding	-	-
19. Water and Climate change	0	-
20. Energy and Climate Change	0	-
Buckingham	700 homes	1000 homes
1. Community Wellbeing	0	+
∠. ⊓eaiin and Equalities	0	+
Health and Equalities Access & Provision of Services		
5. Access & Provision of Services	0	+
	0 +	+
5. Access & Provision of Services6. Access & Provision of Green Infrastr7. Retail Provision	0 +	+++?
5. Access & Provision of Services6. Access & Provision of Green Infrastr	0 + - +?	+ ++? - +
5. Access & Provision of Services 6. Access & Provision of Green Infrastr 7. Retail Provision 8. Town and Village Centres 9. Workforce and Skills	0 + - +? +?	+ ++? - + +
5. Access & Provision of Services6. Access & Provision of Green Infrastr7. Retail Provision8. Town and Village Centres	0 + - +? +?	+ ++? - + + +
5. Access & Provision of Services 6. Access & Provision of Green Infrastr 7. Retail Provision 8. Town and Village Centres 9. Workforce and Skills 10. Employment and Economy	0 + - +? +? -	+ ++? - + + +
5. Access & Provision of Services 6. Access & Provision of Green Infrastr 7. Retail Provision 8. Town and Village Centres 9. Workforce and Skills 10. Employment and Economy 12. Housing 13. Best Use of Land	0 + - +? +? +? -	+ ++? - + + +
5. Access & Provision of Services 6. Access & Provision of Green Infrastr 7. Retail Provision 8. Town and Village Centres 9. Workforce and Skills 10. Employment and Economy 12. Housing 13. Best Use of Land 14. Transport and Travel	0 + - +? +? +? -	+ ++? - + + +
5. Access & Provision of Services 6. Access & Provision of Green Infrastr 7. Retail Provision 8. Town and Village Centres 9. Workforce and Skills 10. Employment and Economy 12. Housing 13. Best Use of Land 14. Transport and Travel 15. Air Quality	0 + + - +? +? - - - 0	+ ++? - + + + + 0
5. Access & Provision of Services 6. Access & Provision of Green Infrastr 7. Retail Provision 8. Town and Village Centres 9. Workforce and Skills 10. Employment and Economy 12. Housing 13. Best Use of Land 14. Transport and Travel	0 + + - +? +? - - 0 ?	+ ++? - + + + + 0 - - -?
5. Access & Provision of Services 6. Access & Provision of Green Infrastr 7. Retail Provision 8. Town and Village Centres 9. Workforce and Skills 10. Employment and Economy 12. Housing 13. Best Use of Land 14. Transport and Travel 15. Air Quality 16. Landscape and Heritage 17. Biodiversity	0 + + - +? +? - - - 0 ? -?	+ ++? - + + + + 0 - - -? -?
5. Access & Provision of Services 6. Access & Provision of Green Infrastr 7. Retail Provision 8. Town and Village Centres 9. Workforce and Skills 10. Employment and Economy 12. Housing 13. Best Use of Land 14. Transport and Travel 15. Air Quality 16. Landscape and Heritage	0 + + - +? +? - - - 0 - -? -?	+ ++? - + + + + 0 - - -? -?

	Low growth	High growth
Winslow	400 homes	400 homes
Community Wellbeing	0	0
2. Health and Equalities	0	0
5. Access & Provision of Services	+	+
6. Access & Provision of Green Infrastr.	-	-
7. Retail Provision	+?	+?
8. Town and Village Centres	+?	+?
9. Workforce and Skills	0	0
10. Employment and Economy	0	0
12. Housing	0	0
13. Best Use of Land	-	-
14. Transport and Travel	+	+
15. Air Quality	-?	-?
16. Landscape and Heritage	-?	-?
17. Biodiversity	0?	0?
18. Flooding	+	+
19. Water and Climate change	0?	0?
20. Energy and Climate Change	0?	0?
Haddenham	100 homes	200 homes
Community Wellbeing	-	-
2. Health and Equalities	-	-
5. Access & Provision of Services	+	+
6. Access & Provision of Green Infrastr	0	-
7. Retail Provision	0	+
8. Town and Village Centres	0	+
9. Workforce and Skills	0	+
10. Employment and Economy	0	+
12. Housing	-	0
13. Best Use of Land	0	-
14. Transport and Travel	-	-
15. Air Quality	-?	-?
16. Landscape and Heritage	-?	-?
17. Biodiversity	0?	-?
18. Flooding	-	-
19. Water and Climate change	0?	-
20. Energy and Climate Change	0?	-

Low growth	High growth
30 homes	40 homes
0	0
0	0
0	0
0	0
0?	0?
0?	0?
0	0
0	0
0	0
-	-
-	-
-?	-?
	-?
-?	-?
-	-
0?	0?
950 homos	1114 homes
- 030 Homes	
	+
1	++?
	+
	++?
_	+
	+
+	++
	-
	?
· ·	-?
	-?
1 -?	-:
-? 0?	
0?	- ? - ?
	30 homes 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0

	Low growth	High growth
Smaller villages (cumulative)	650	671
1. Community Wellbeing	-	-
2. Health and Equalities	-	-
5. Access and Provision of Services	-	-
7. Retail Provision	-?	-?
8. Town and Village Centres	-?	-?
9. Workforce and Skills	0	0
10. Employment and Economy	0	0
12. Housing	+	+
13. Best Use of Land	-	-
14. Transport and Travel	-?	-?
15. Air Quality	-?	-?
16. Landscape and Heritage	-?	-?
17. Biodiversity	-?	-?
18. Flooding	-	-
19. Water and Climate change	-?	-?
20. Energy and Climate Change	0?	0?

- 6.27 The Cabinet decided on 14 August 2012 that the VAP should be for 6,000 new homes. The detailed reasons for this decision are provided in the Cabinet minutes¹³. In brief, arguments in favour of 6,000 homes were:
 - Reduces the need for greenfield allocations at Aylesbury.
 - Sets a less onerous five year housing supply target, and reduces the reliance on Major Development Areas, with therefore less risk of failing to meet the five year supply and less risk of losing appeals.
 - Minimises impacts on existing communities.
 - Reflects views expressed through public consultation, particularly those from local communities, and therefore better

- accords with the principles of localism and neighbourhood planning.
- Reduces growth requirements for homes at smaller settlements to reflect community aspirations and therefore better accords with the principles of localism and neighbourhood planning.
- Reduces the risk of development not providing for all infrastructure requirements.
- Provides the minimum believed necessary to comply with the requirements arising from the NPPF to meet identified local housing need, plus an allowance of between 5% and 20% for under-delivery, plus a recognition of the statutory duty to cooperate with neighbouring authorities to meet broader needs.
- 6.28 Arguments in favour of 9,000 homes were:
 - Provides greater potential to deliver strategic infrastructure.
 - Provides a greater contribution to the District-wide infrastructure "pot".
 - · Maximises housing choice and access to open market housing.
 - Provides more affordable homes.
 - Might provide a greater workforce for the Vale to lessen incommuting.
 - More responsive to Government pressure to increase the housing supply and makes allowance for choice and nondelivery and to make a greater contribution to the wider housing need.
- 6.29 The Cabinet concluded that "Having taken all the additional material into account... the most appropriate level of housing growth to achieve sustainable development was lower than the figure previously considered and the work on the Vale of Aylesbury Plan should be on the basis of a District-wide figure of 6000 homes in addition to those already committed. This did not necessarily mean that a lower level of employment growth had to be planned for... the figure of c6000 jobs to 2031 should be regarded as the absolute minimum, and that where possible the Plan should strive for an even higher jobs target which would take into account the need for greater flexibility for employment

¹³

- options, the possibility of more sustainable travel to work patterns and even a reduction in future possible out commuting from the District."¹⁴
- 6.30 The revised apportionment addresses the concerns raised by Members about giving greater weight to the responses from local communities. It more closely reflects the 'community view' responses from parish councils regarding growth levels they would support. It also gives greater emphasis on the general comment that there should be a lesser concentration of growth around Aylesbury to reduce impacts on adjacent communities, especially when taking into account the significant growth of urban extensions at Aylesbury in recent years and the growth still in the pipeline. The issue of over-concentration at Aylesbury, with accompanying doubts on deliverability and viability, was also raised at the AVDLP Inquiry in 2003 and at the withdrawn Core Strategy Examination in 2010.
- 6.31 When the additional homes figure was reviewed to 6,000 in August 2012, the proposed apportionment was correspondingly adjusted to broadly similar ratios between the housing market areas, with a slightly reduced proportion at Aylesbury as follows¹⁵:

Housing market area	Number of additional homes to 2031 (excluding commitments as of March 2011)	% of district total of homes through VAP	% of district of total new homes (including commitments)
Aylesbury	3,419	57%	64%
Remaining rural south ¹⁶	879	15%	13
Buckingham	730	12%	11
Remaining rural north ¹⁷	972	16%	11
	Total 6,000	100%	99%

6.32 The potential re-balancing of growth across the district addresses key sustainability issues related to sharing the benefits of growth and investment in infrastructure more widely, especially in terms safeguarding services and delivering more affordable housing in rural areas. The apportionment is also broadly consistent with recent rates of housing delivery across the rest of district beyond Aylesbury which is an important factor in terms of the viability and deliverability of the approach.

¹⁴ ibid.

¹⁵ In Report to Cabinet 14 August the apportionment was presented by settlement type rather than housing market area, but for the purposes of clarity in showing the decision-making process through to the final version of VAP (which presents in housing market areas) then this has been presented as housing market areas to make easier to compare with the May Cabinet Report and the Stage 1 consultation document.

¹⁶ Also referred to in VAP as 'southern vale'

¹⁷ Also referred to in VAP as 'northern vale'

Proportion of affordable housing

6.33 A sustainability appraisal of August 2012 – shown in full at Appendix E - considered options for the proportion of affordable homes that should be provided, and the threshold at which these requirements should be provided. The proportion of affordable homes considered as part of the VAP were:

Option a. Continue with the current policy approach of seeking 35% affordable housing across the district	This target has been implemented to a large extent across developments in the district since the policy in the South East Plan replaced local policies in the district. During this time, which includes the global economic downturn, it has generally been deliverable and realistic on developments within Aylesbury Vale of 15 or more dwellings, with the exception of major development areas around Aylesbury where infrastructure costs have made that level unviable. A target of 35% has also been tested at the local level at the Examination for the withdrawn Core Strategy for developments of between 15 and 1,999 dwellings.
Option b. Increase the target to 45%	The identified need for affordable housing is so significant that this option seeks to increase the target of affordable housing contributions in order to tackle more of the deficit. This target has not previously been implemented in the district but the previous adopted Supplementary Planning Document (superseded by the South East Plan) included a target of 40% for developments of 15 or more dwellings, and the withdrawn Core Strategy included a target of 40% for developments of 2,000 or more dwellings. In other districts with similar housing markets in the area, levels higher than 35% have been adopted.
Option c. Reduce the target to 20%	This option is promoted by the development industry as being deliverable in some of the recent major developments across the district, albeit

when the housing market is at a low point and it is
reasonable to anticipate that it will recover to some
extent during the plan period.

6.34 Table 6.10 summarises the findings of the sustainability appraisal of the options for the proportion of affordable housing to be provided. Most of the SA objectives were 'scoped out' for the appraisal, since the different options would have the same appraisal results (e.g. design, flooding) or they would not have significant effects on that objective (e.g. retail provision, town and village centres).

Table 6.10 Appraisal of proportion of affordable housing options

SA objective	Option		
	а 35%	b 45%	c 20%
1. Community wellbeing	+?	?	-
2. Health and equalities	+/-	+	-
11. Employers and economy	+?	+?	-
12. Housing	+	++/-	++/-
13. Best use of land	+/-	-	+?
14-15. Transport, air quality	+?	+/-	+/-
Other benefits	-	-	?

6.35 A higher proportion of affordable housing (Option b) would help to ensure that residents of Aylesbury Vale had access to the housing that they need, which in turn would support their health. It would help ensure that key workers who might otherwise not be able to afford market prices could live near their jobs. However it might make some housing sites non-viable because of the combined cost of providing affordable housing and (for instance) providing necessary new infrastructure, cleaning up contamination, or dealing with other site constraints. This might mean that Greenfield sites are developed over more expensive brownfield sites, which is not a good use of land and is likely to increase the need to travel by car.

- 6.36 A lower proportion of affordable housing (Option c) would allow more housing sites to be viable, including brownfield sites and/or sites nearer services and public transport. However, although this is likely to lead to higher rates of house building overall, these dwellings may not be the kind needed by local residents; this would exacerbate existing inequalities. Employers may not find it easy to recruit local residents because of difficulties that the residents face in living near their jobs.
- 6.37 Option a tries to strike a balance between these competing demands. 35% affordable housing should be viable, especially in the longer run. Unless the rate of housing completions rises sharply, this would still not fully deal with Aylesbury Vale's need for affordable housing.

Threshold for affordable housing

6.38 Options considered for the size of new development to which the affordable housing requirement should apply:

Option d. Continue with threshold of 15 dwellings to seek contributions	Currently a threshold applies and contributions for affordable housing are only sought from developments of 15 or more dwellings.
Option e. Remove the threshold altogether and seek contributions from all developments	The nature of development in the district, with many sites of fewer than 15 dwellings, means that many developments are not providing affordable housing or making contributions towards it. Options e and f considers whether
Option f. Reduce threshold to 5 dwellings	a lower threshold should be set at which to apply the policy.

6.39 Table 6.11 summarises the findings of the sustainability appraisal of the options for the proportion of affordable housing to be provided. **Appendix E** shows the full appraisal.

Table 6.11 Appraisal of affordable housing threshold options

SA Objective	Option		
	d	е	f
	15	0	5
Community wellbeing	no si	ignificant difference +	
2. Health and equalities	0		
11. Employers and economy	0	+	
12. Housing	0	+/	/_
13. Best use of land	0	?	1
14-15. Transport, air quality	0		
Other benefits	-	C	

- 6.40 Options e and f (thresholds of 0 or 5 dwellings for the provision of affordable dwellings) would have very similar impacts. They would allow for the provision of greater quantities of affordable homes than option d (threshold of 15 dwellings), helping to improve residents' health and improving employers' access to local workers. A lower threshold may make some smaller developments non-viable, but would otherwise provide needed affordable housing.
- 6.41 Whether a lower threshold would affect land use, transport and air quality depends on where the smaller developments would be located and whether an affordable housing requirement would make them non-viable. Smaller developments are unlikely to provide wider benefits such as community facilities or green infrastructure, so these benefits would not be affected by an affordable housing requirement: in contrast, larger developments are typically expected to provide other benefits, and a stringent affordable housing requirement could reduce the amount of other benefits that they can provide.
- 6.42 The proposed policy approach for delivering affordable housing in the VAP is a target to secure 35% affordable housing provision on developments of >15 dwellings; require at least 20% of dwellings to be affordable on developments of between 5 and 14 dwellings; and require developments of fewer than 5 dwellings to provide a financial

contribution equivalent to 20% on-site provision to facilitate off-site provision, with these principles applied on a site by site basis having regard to viability, availability of grants and subsidies, and the type of housing needed in that locality. Overall this strikes a good balance between the total provision of homes, provision of affordable homes, viability of development, and possibility for larger developments to also provide wider benefits.

7 – Sustainability appraisal of VAP strategic policies

"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"

(SEA Directive Annex I(f))

"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"

(SEA Directive Annex I(g))

- 7.1 Policies contained in the Vale of Aylesbury Plan Submission Version have been developed from various consultation stages including stakeholder forums, exhibitions and surveys:
 - Town and parish council 'Community View' Dec 2010 to Dec 2011. Consultation on future jobs, homes and infrastructure needs.
 - District Level public consultation December 2011 March 2012. Consultation on strategic plan aims and objectives; jobs and homes numbers and broad apportionment for homes and strategic plan policies including affordable housing policy.
- 7.2 Table 7.1 summarises the long term impacts of the VAP strategic policies. Appendix F shows both the short and the long term impacts, and includes a commentary on the reasons for making the judgement. At the bottom of each of the detailed appraisal matrices of the appendix, a summary conclusion of significant effects is provided, along with any recommendations for changes and suggested mitigation measures. Uncertainties in the testing process are also listed where relevant.

Table 7.1 Sustainability appraisal of VAP policies (long term impacts) VS5 Existing employment land VS1 Sustainable growth VS7 Timely delivery of homes VS4 Employment arowth VS12 Localism & local distinct. VS8 Affordable housing VS9 Rural exception sites VS10 Environmental VS11 Low carbon energy VS3 Develope contributions VS6 Town & local centres 1. Community wellbeing 2. Health and equalities 3. Design 4. Crime and safety 5. Services 6. Green infrastructure 7. Retail provision 8. Town and village centres 9. Workforce and skills 10. Employment & economy 11. Employers and economy 12. Housing 13. Best use of land +/-? 14. Transport and travel 15. Air quality 16. Landscape and heritage 17. Biodiversity 18. Flooding 19. Water & climate change 20. Energy & climate change

7.3 The sustainability appraisal made a range of recommendations for improving the sustainability of the VAP policies. These are shown at Table 7.2, along with information about changes to the VAP made in response to these recommendations.

Table 7.2 Recommendations on the VAP policies made by the sustainability appraisal

Recommendation	ecommendation Reason for the recommendation						
VS1 – Consider including 'Any adverse impacts of granting permission would outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole'	This wording is included in PINS guidance.	Policy VS1 has been updated to include the additional wording.					
VS2 - Include 'at the most sustainable locations for those settlements' after 'strategic levels of growth and investment will be at Aylesbury and Buckingham'	To ensure the most sustainable locations within the strategic settlements are supported, not just the location of the settlement itself.	Policy VS2 (a) has been updated to "strategic growth and investment will be concentrated at sustainable locations at:"					
VS3 - List any other transport infrastructure	The Eastern Link Road is specifically mentioned	Detail about transport infrastructure is presented in the Infrastructure Delivery Plan. Policy VS2 has been					
		updated to refer to Eastern Link Road and reference in VS3 deleted					

Recommendation	Reason for the	Planning team's
	recommendation	to be more consistent in referring to items of key infrastructure.
VS3 - Should/can the development contributions be diverted to support deprived communities?	One of the VAP objectives is to reduce inequalities, but this is explicitly addressed in the current VAP policies	Reducing inequalities and community cohesion is a theme which runs through VAP. It is specifically addressed in the Vision (part d) and Objective 8. Policies in VAP seek to
		create the conditions to reduce deprivation and enhance opportunities for less well-off communities, such as delivering affordable housing (VS8 and VS9) and seeking provision for training and skills (VS4), and protecting community facilities (VS6). This issue will be addressed in more detail in delivery policies.
VS4 – Make reference to protecting and enhancing environmental assets, heritage and green infrastructure	These are ways of supporting economic growth, particularly in rural areas, with relatively few transport impacts	Protecting environmental assets and green infrastructure is addressed in VS10.
VS4 - Support home working and provision of broadband	These are ways of supporting economic growth, particularly in rural areas, with relatively few transport impacts	Policy VS4 has been updated to include home working under 'space for growing businesses'. 'growth of the rural

Recommendation	Reason for the	Planning team's
	recommendation	response
	recommendation	economy' has been updated to include reference to sustainable locations and supporting infrastructure including communications, and already includes environmental impacts, which would include transport impacts.
VS5 - Confirm whether both criteria are feasible	Policy VS5 suggests that any new mixed use development would need to provide for the same number of jobs as the previous employment (only) development. Is this feasible	In the majority of cases this should be viable through intensifying the uses on the site and making more efficient use of land, for example adding residential units above where there might currently be only one or two storey offices, or by putting car parking underground/undercroft instead of surface car parks.
VS8 – Add reference to mixed sustainable communities for provision of affordable housing; link to VS2	To ensure affordable housing is blended into communities with good quality design and appropriate services and facilities.	The mix, size, tenure, and other detailed aspects of affordable housing policy such as how they are distributed within developments, will be set out in VAP delivery policies.

Recommendation	Reason for the	Planning team's							
	recommendation	response							
VS8 - Set out how the identified sustainability issues about providing for the aging population will be addressed through the VAP									
VS8 - Further details about how viability will be assessed could be set out. The requirement for open book accounting goes some way towards this.	This would provide a robust framework and make the plan less vulnerable to exploitation and to ensure fair application of policy across developments.	Further detail about how the policy will be implemented will implemented will be set out in VAP delivery policies or supplementary planning guidance. This leaves the policy more flexible to account for changes in how affordable housing is funded through the plan period.							
VS8 - The policy could include a requirement for any significant amount of affordable housing to be accessible by a regular, high quality bus service and/or walking/ cycling routes, or some other way to ensure that affordable housing is accessible	Affordable housing may be easier to provide on sites that are less accessible to services than on more central sites that are closer to public transport. However this could cause access problems for the residents of the affordable housing	VAP will need to consider accessibility issues for all major proposals for residential development, including affordable housing provision. The spatial strategy for the broad distribution of development across the district, as will be set out in the emerging VAP Strategy document, seeks to steer the majority of development to the most sustainable locations and that includes considering							

Recommendation	Reason for the	Planning team's
	recommendation	response accessibility and transport implications at a broad level. Some new residential development will also be needed in rural areas but the major sites are likely to be closer to the urban areas which have better access to sustainable transport connections.
VS8 - The policy could include a requirement that Greenfield developers subsidise the development of affordable housing in accessible locations	As above	This could potentially be explored through the development management process as part of S106 negotiations. However because of the nature of the district, that most new residential development is Greenfield, then it is likely to overall hinder the delivery of affordable housing and may result in lower numbers of affordable housing being delivered.
VS8 - The policy could require a proportion of the affordable housing to be intermediate (for key workers)	At the moment, the policy does not distinguish between different types of affordable homes (except rural exception sites).	The more detailed issue of the tenure mix for affordable housing will be addressed in subsequent documents such as VAP Delivery policies or a separate DPD, along with

Recommendation	Reason for the	Planning team's
	This may mean that housing for key workers is not provided, so the benefits to employers of having a wide variety of workforce within commuting distance could be lost.	further guidance to developers about the most appropriate mix of sizes of affordable dwellings. Addressing this in a separate document enables the policy to be flexible enough to respond to changes in need during the plan period, because this will be affected by external factors such as government funding for key workers to buy intermediate housing. In the meantime the issue will be highlighted to developers in the VAP Strategy document by requiring them to take into account recent SHMA findings
VS10 - The bullet point on conserving and enhancing landscape character etc. could usefully come under the first (rather than the second) list of bullet points.	The first list is currently too focused on designations, and the second list seems to be mostly about green infrastructure.	Policy VS10 has been updated to reorder the bullet points.
VS11 - Support district heating	District heating is an efficient way of providing heat,	District heating is very specific and is only likely to be viable in new, large

Recommendation	Reason for the recommendation	Planning team's response								
	especially to large housing developments such as those planned for near Aylesbury	developments and where there is a major heat producer nearby. This kind of detail would be addressed in site-specific policies in VAP or Neighbourhood Plans. The reference to 'renewable or low carbon energy' would not prevent district heating proposals coming forward but also is more flexible to allow for alternative sustainable energy sources too.								
VS11 - Policy should also consider other ways to tackle greenhouse gas emissions from development via setting strategic level framework to shape subsequent delivery policies.	It currently focuses on the construction stage of development but it could also identify principles for the operational stage of development such as green travel plans and contributions improved public and sustainable transport.	Policy VS11 has been updated to include a requirement that developments seek to reduce greenhouse gas emissions as well as building in resilience to adapt to a changing climate.								
VS11 - Clarify that this applies to all types of development.	To make sure all development in the district is sustainable.	Policy VS11 has been updated to clarify which part of the policy applies to energy generation and which part applies to all developments. The name of the policy has also								

Recommendation	Reason for the recommendation	Planning team's response
		been updated to reflect this more clearly.
VS11 - Mentions positive measures to reduce the environmental impact of the construction and operational efficiency of the development', but could be clearer about this meaning reduction of energy, water and resource use. Also consider being more proactive / positive about renewable and low carbon energy developments in VS11	To support the SA objective on energy and climate change and water and climate change. Also the policy only provides rules by which low carbon energy proposals will be determined	VS11 now refers to measure for reducing the environmental impact of construction and operation efficiency of development and building in resilience to adapt to climate change. It has also been reworded to 'improve the operational efficiency of the development (how people live or work in the development) to reduce energy water and resource use, as well as building in resilience to adapt to a changing climate. The policy now refers to the council working with partners to address renewable and low carbon energy development.
VS11 – Should	VS6 talks about	VS2 has been reworded

Recommendation	Reason for the recommendation	Planning team's response
mention avoiding high quality agricultural land and building at an appropriate density.	focusing development in town centres, but nowhere in the VAP is there mention of avoiding high quality agricultural land or building at an appropriate density.	to focus development at the most sustainable locations which will take into account agricultural land quality.

8 – Overall effects of the VAP and mitigation

"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"

(SEA Directive Annex I(f))

"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"

(SEA Directive Annex I(g))

8.2 The SEA Directive requires consideration of short, medium and long term effects, and secondary, cumulative and synergistic effects.

Short, medium and long term effects

- 3.3 The main **short-term** (less than five years) effects of the VAP will be due to construction. These effects will include:
 - Land take from new development, and associated impacts on biodiversity, the landscape, and the historic environment.
 These effects are permanent and mostly negative.
 - Additional construction traffic, with impacts on congestion and air quality. These effects are temporary and negative.
 - New construction jobs and the economic benefits of construction. These effects are temporary and positive.
- The main **medium-term** (five to ten years) and **long-term** (beyond ten years) effects will include:
 - Social and economic benefits of having more housing and employment development, with associated infrastructure.

- There should be a greater number of jobs in the district, to readdress the jobs to homes balance, which will enable more sustainable communities and work travel patterns.
- The benefits of the environmental protection policies will be evident through development which will be granted through the VAP, for example better use of renewables, construction standards and energy efficiency.
- Key strategic infrastructure will have been delivered, for example Aylesbury Eastern Link Road and East-West Rail, which will help to better connect communities within the district and adjoining areas.

Secondary/indirect effects

8.5 Secondary (or indirect) effects are indirect effects, for example health effects of air pollution from transport. Table 8.1 shows the main indirect effects of the VAP, and the associated direct effects.

Table 8.1 Indirect effects of the VAP

Direct effect	Indirect effect	Affected receptor
Development of greenfield sites for housing on the edge of settlements.	Reduction in biodiversity and fragmentation of habitats Reduction in landscape quality	Wildlife habitats, particularly around towns Landscape, particularly around towns
Greenhouse gas emissions from increases in traffic from current and new housing and from energy use in	Climate change	Worldwide

Direct effect	Indirect effect	Affected receptor
new housing		
Increased traffic from new development in towns	Loss of tranquillity	Rural areas
Increased population	Increased demand for water and sewerage facilities Increased demand for schools and other community facilities	Groundwater, water resources and sewerage infrastructure Community facilities
Development in flood risk areas.	Increased flooding	Land around large new developments
Development of land affected by contamination and run off from new developments	Possible pollution of groundwater and watercourses (depending on effectiveness of mitigation)	Groundwater and watercourses
Increased population and local employment	Increased use of local shops and other businesses	Local businesses and economy, including in rural areas
Through developer contributions from new developments	Improved provision of community facilities, including open space and recreational facilities	Community facilities and open space
Large development to the east of Aylesbury	Reduction in community identity	Villages to the east of Aylesbury

Cumulative and synergistic effects

- 8.6 **Cumulative effects** are the total result of environmental impact from a number of projects and activities. They arise for instance where several developments each have an insignificant effect, but together have a significant effect, or where several individual effects (e.g. noise, dust and visual) have a combined effect.
- 8.7 **Synergistic effects** are those which interact to produce a total effect greater than the sum of the individual effects, for example progressive fragmentation of a wildlife habitat leading to areas too small to support wildlife.
- 8.8 Cumulative and synergistic effects are important because many problems arise from the accumulation of a large number of small and often indirect effects, rather than a few large and obvious ones:
- 8.9 An assessment of possible cumulative and synergistic effects of the Vale of Aylesbury Plan: Strategy DPD has been undertaken. At this strategic level, there is major uncertainty in identifying cumulative effects, and it is only possible to do so in general terms. However it is a useful process which helps identify cumulative effects which need to be considered in more detail for the Vale of Aylesbury Plan: Delivery Policies.
- 8.10 Table 8.2 brings together the findings of Chapter 5 (vision, objectives) and Chapter 7 (policies) to give an overview of the impacts of the VAP. Table 8.3 gives more detail on the cumulative impacts of the VAP. Table 8.4 makes recommendations for reducing the negative cumulative effects of the VAP and enhancing its benefits.

Table 8.2 Cumulative impacts of the VAP

	Vision a	Vision b	Vision c	Vision d	Vision e	Vision f	Vision g	Vision h	Vision i	Objective 1	Objective 2	Objective 3	Objective 4	Objective 5	Objective 6	Objective 7	Objective 8	VS1 Sustainable growth	VS2 Spatial strategy	VS3 Developer contributions	VS4 Employment growth	VS5 Existing employment land	VS6 Town & local centres	VS7 Timely delivery of homes	VS8 Affordable housing	VS9 Rural exception sites	VS10 Environmental assets	VS11 Low carbon energy	VS12 Localism & local distinct.	Cumulative impacts
1. Community wellbeing	+	+	++	++	+	++	+	+	+	+	+	++	+	+	+	+	+	-/+	+/-	++	++	+	++	+	-	+	+?	+	++	+
2. Health and equalities	+	+	++	++	++	++	+	+	+	+	++	+	++	+	+	+	++	-/+	++	++	++	+	++	+	-	+	+	+?	+	++
3. Design	+	0	++	0	0	0	++	0	++	0	0	+	0	++	++	++	0	-	+	+?	+?	+	++	0	0	0	+	+/-	+	+
4. Crime and safety	+	0	++	++	0	0	+	+	0	0	+	0	0	+	+	+	+	-	+	+?	+?	+	++	0	0	0	+	0	+	0
5. Services	++	++	++	0	+	++	++	+	++	0	++	0	+	++	0	0	+	-/+	+	++	+3	+	+	++	+	+/-	+	+	+	++
6. Green infrastructure	+	++	+	0	0	+	++	0	++	+/-	+	+/-	0	0	+	+	+	-/+	+	+	+?	0	+	+	-	+/-	++	+	+	+
7. Retail provision	+	0	0	0	0	+	++	+	0	+	+	0	+	+	0	0	0	+	+	+?	+	+?	+	+	+	+/-	0	0	+	+
8. Town and village centres	+	+	0	0	0	0	++	++	0	+	+	+	++	++	+	0	+	-/+	+	++	+	+	++	+	+	+/-	+	+	+	+
9. Workforce and skills	+	++	0	0	++	0	++	++	0	+	++	+	0	0	0	0	+	++	+?	+	++	++	++	+	+	+	0	+?	+	+
10. Employment & economy	++	++	0	0	+	0	++	++	++	++	+	0	+	+	+	+		++	++	+	++	++	++	+	+	+	+	+?	+	+
11. Employers and economy	++	++	0	0	+	+	++	++	++	++	+	0	+	+	+	+	+	++	++	+	++	++	++	+	+	+	+	+?	+	++
12. Housing	++	+	++	0	0	0	0	+	+	+	+	++	+	0	+	+	0	+/-	+	++	+	+	++	++	-	++	+	+	+	+
13. Best use of land	++	0	0	+	0	0	++	++	+	0	0	0	+	+	++	+	0	+/-	-	+	0	+?	++	+	-	-	+	+?	0	0
14. Transport and travel	+/-	+	+	0	0	+	++	+	0	+	++	0	+	0	0	0	0	++	+/?	++	+/-?	+/-	++	++	-/+	-	+?	+	+	0
15. Air quality	-	0	+/-	0	0	-	0	-	-	- 1	-	-	0	-	-	0	0	+/-	-	+/-	+/?	+/-	+/-	+	-/+	-	+?	+?	0	-
16. Landscape and heritage	0	-	0	0	0	-	-	-	+/-	-	-	-	0	0	++	+	0	-	+/-	++	-	+/-	+/-	-	-?	-	++	+	+?	-
17. Biodiversity	-	+/-	+/-	0	0	0	0	-	+	-	+/	-	+	0	++	0	0	-	+/-	++	-	+/-	+	-	-?	-	++	+	+?	-
18. Flooding	0	++	+	0	0	0	+	-			-		+	+	_+	-++	0	-	+/-	++	-	+/-	+	•	-?	-	+	+/-	+	-
19. Water & climate change	-	+?	0	0	0	0	0	-	-1	-	0	-	+	0	0	++	0	-	- ?	+?	-	+/-	+?	-	-?	-	+	+	+	-
20. Energy & climate change	-	0	+?	0	0	0	0	-	-	-	0	-	+	0	0	++	0	-		+?	-	+/-	+?	-	-?	-	+	+	+	-

Table 8.3 Cumulative impacts of the VAP

SA objective	Cum	ulative impacts of the VAP
1. Community wellbeing	+	The VAP will deliver 6000 new homes (including affordable housing) on top of existing commitments, and employment to meet local needs. It says little about the needs of subgroups of residents, notably the elderly and Gypsies and Travellers.
2. Health and equalities	++	The VAP vision and objectives are for Aylesbury Vale residents to live longer, healthier lives. VAP policies that support this include those on housing delivery (VS7 – VS9), developer contributions including for recreational open space (VS3), and green infrastructure (VS10).
3. Design	+	The VAP vision is for well-designed developments that are sensitive to the district's local character and well integrated with existing communities. will help to ensure that new developments are of high quality and respect their surroundings. Objective 5 promotes quality design, and policies VS2 and VS6 promote good design.
4. Crime and safety	0	The vision mentions safety several times, and the VAP's emphasis on town centres and good design will help to improve safety. However overall the VAP Strategy is unlikely to have a significant effect on crime or safety. Instead it is more likely to be addressed through more detailed site-specific policies or masterplans linked to VAP Strategy.
5. Services	++	The VAP, and particularly policy VS3, aims to
6. Green infrastructure	+	ensure that development is supported by the necessary investment in new infrastructure and services, and that access to community facilities and services (including health care and recreation space) are improved.

7. Retail provision	+	VS6 supports the delivery of accessible retail facilities, and aims to prevent the loss of retail provision in rural settlements.	
8. Town and village centres	+	The VAP vision sets out how Aylesbury and Buckingham will be improved through development, and VS2 states that development will be focused at Aylesbury and Buckingham, supported by growth at other strategic settlements and larger villages.	
9. Workforce and skills	+	The spatial vision aspires that people in Aylesbury Vale will have access to excellent education and training opportunities, and the vision for Aylesbury is that it will have 'enhanced its role and reputation as a centre for education diversity and excellence', similarly for Buckingham that it will be a 'hub of higher education and skills'.	
10. Employment & economy	++	VS2 and VS4 support the provision of at least 6000	
11. Employers and economy	++	new jobs by 2031. VS4 and VS5 support the safeguarding of existing employment sites (and associated jobs) and the delivery of new sites, as well as growth of the rural economy.	
12. Housing	+	The VAP will deliver 6000 new homes, including affordable housing. This meets the existing and future housing needs of people in the district, and includes consideration of any needs originating from neighbouring authorities.	
13. Best use of land	0	Most of the proposed development will be accommodated in the largest settlements in Aylesbury Vale, which have the widest range of facilities and services and offer the greatest potential for self containment. This will help to make more efficient use of urban land. However most of the new development will inevitably be on	

		Greenfield land.	
14. Transport and	0	The VAP will help to provide a better balance	
travel		between employment opportunities and the resident	
15. Air quality	-	workforce – reducing net outward commuting. The vision note the need to create an environment that it is more conducive to use of public transport, cycling and walking. However the vision otherwise says little about transport except to promote the Eastern Link Roads and East West Rail (vision, VS2, VS3). The scale of new development envisaged will inevitably increase traffic, congestion, and air pollution.	
16. Landscape	-	The vision says only that Aylesbury will be used as	
and heritage		a base to explore local nature conservation,	
17. Biodiversity	-	landscape and historic attractions. Objective 6 notes that development will be managed in a way that ensures the protection and enhancement of the historic and natural environment, and VS10 is wholly about protecting environmental assets, heritage and green infrastructure. However major greenfield development will inevitably have significant impacts on the landscape and biodiversity.	
18. Flooding	+	VAP objective b) refers to flood protection measures, and Objective 7 notes that flood protection should be improved and no Greenfield development, other than for essential strategic infrastructure should take place in flood risk zones.	
19. Water & climate change	-	Policy VS10 aims to conserve and enhance watercourses, and supports SUDs. Policy VS11 is entitled 'sustainable construction' but says nothing about reducing water use. The scale of development anticipated by the VAP will inevitably increase water use and threaten water quality.	

20. Energy & climate change		Policy VS11 provides criteria for determining whether renewable and lower carbon energy developments will be permitted, but does not specifically support such developments. The scale of development anticipated by the VAP will inevitably increase greenhouse gas emissions and waste generation.
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Table 8.4 Recommendations on the overall effects of the VAP made by the sustainability appraisal

Recommendation	Reason for the recommendation	Planning team's response
Provide more information on how the VAP will improve skills and education	The improvement to skills and education is an SA and VAP objective, but at the moment it is not clear how the objective is being translated into policy. Only Aylesbury is said to provide improved educational facilities.	VS3 has been amended to include the support for training and skills. Further details will be identified in the VAP: delivery document.
Consider how the VAP can help to reduce inequalities	The reduction in inequalities is an SA and VAP objective, but at the moment it is not clear how the objective is translated into policy.	VS3 has been amended to include the support training and skills which indirectly helps to reduce inequalities. Also the VAP spatial strategy aims to redistribute growth more evenly across the district and that other areas can capture the benefits of

Recommendation	Reason for the recommendation	Planning team's response
Give greater emphasis in the VAP to walking, cycling and public transport	The VAP says little about transport except to promote the Eastern Link Roads and East West Rail (vision, VS2, VS3), and to locate development where it can be accessed by walking, cycling and public transport (pp.7 and 8). Promotion of walking and cycling would help to achieve the VAP's objective regarding improving health	development, e.g. investment in infrastructure. Further details will also be identified in the VAP: delivery document. VS2 supports the development in the most sustainable locations. By directing growth to these locations, the provision of public transport, walking and cycling paths is supported. Also in VS4 the policy supports home working which has a positive impact in reducing car transport. Further details will be identified in the VAP:
Explain in the VAP how AVDC has fulfilled the 'duty to cooperate'	Page 5 of the VAP: Strategy document notes that the VAP "includes consideration of any needs originating from neighbouring authorities" but does not include further information. Given that housing numbers in the	delivery document. The issue of duty to cooperate is picked up in a separate document which has been provided by working with neighbouring authorities to identify cross boarder issues.

Recommendation	Reason for the recommendation	Planning team's response
	VAP are much reduced from those in the South East Plan, it would be worthwhile explaining why this would not have a significant impact on neighbouring authorities.	
Say more about waste management	The vision and objectives note that waste generation will be minimised, but this is not supported by any policies	VS11 has been amended to include 'operational efficiency for development (how people live and work). In addition Buckinghamshire Waste and Minerals Core Strategy addresses these issues. Further detail will be identified in the VAP: Delivery document.

Conclusion

Overall the vision, objectives, and policies in VAP Strategy are likely to support sustainable development but with some of the SA objectives being addressed more strongly than others. An inherent difficulty in assessing a 'strategic' document is the relative lack of detail. This makes it difficult to determine the effects for some of the SA objectives because of the uncertainty about how it would be implemented. For example it was difficult to determine the effects of policies and options which considered the scale of housing development without greater detail about the locations of the housing. Nonetheless the SA has been a useful tool in raising awareness of potentially significant effects to inform decisions about the content of VAP.

9 - Next steps

9.2 This chapter discusses what happens next: consultation arrangements, post-adoption explanation of how the SA influenced the LDP, and monitoring of the LDP's significant effects.

Post adoption 'SEA statement'

9.3 Once the VAP is adopted, Aylesbury Vale District Council will publish an 'SEA statement' which explains how the sustainability appraisal influenced the LDP. Publication of such an SEA statement is required by the SEA Directive (Article 9.1b). Most of that information is already available in this SA report, but the SEA statement will also include information on how further rounds of SA, and consultation comments on this report and any further SA rounds, were taken into account by the planning team.

Monitoring

"a description of the **measures envisaged concerning monitoring**"
(SEA Directive Annex I(i))

- 9.4 Once a plan is adopted, the SEA Directive requires local authorities to "monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action", and the environmental report should describe how this might be carried out.
- 9.5 Monitor the significant effects of implementing the Vale of Aylesbury Plan: Strategy is an important part of the appraisal and plan development process. Monitoring has a number of benefits:
 - It allows the actual significant effects of the implementation of the Strategy and Policies to be tested against those predicted in the SA:

- It helps to ensure that issues that arise, including unexpected problems, can be identified and tackled;
- It helps further predictions to be made more accurately;
- It can contribute to baseline information for future plans.
- 9.6 Much monitoring is already carried out in Aylesbury Vale for other purposes, for instance traffic counts for transport planning, and reviews of landscape and nature conservation designations as an input to national level monitoring. **Appendix A** shows the current situation in Aylesbury Vale, based on existing monitoring data.
- 9.7 The SA process has identified a range of significant environmental effects, as well as underlying assumptions of the VAP which, if they do not work out in practice, could lead to unforeseen adverse effects. Table 9.1 proposes a framework to monitor these impacts. The significant sustainability effects indicators have been drawn from the indicators in the baseline data of this sustainability appraisal (which are linked to the sustainability objectives used in the appraisal). They aim to:
 - Concentrate on the key sustainability issues identified in the appraisal;
 - Provide information to identify when problems, including unexpected ones, arise;
 - Contribute to addressing deficiencies in data availability identified in this appraisal.
- 9.8 The indicators of Table 9.1 have all been included in the Council's Annual Monitoring Report (AMR).

Table 9.1: Monitoring framework

SA objective	Indicators
1. Community wellbeing	1.1 Provision of community facilities in major new developments
	1.2 Population and age profile across the district
	2.1 Multiple indices of deprivation (proportion of the population who live in the worst super output areas in the region)
Health and equalities	2.2 Death rate
	2.3 Life expectancy
	2.4 Adult participation in sport and active recreation
3. Design	3.1 Building for life assessments (developments of 10 homes or more)
	3.2 Summary of AVDC design awards
4. Crime and safety	4.1 Proportion of homes achieving the Secured by Design award
	4.2 Crime rates
5. Services	5.1 Accessibility of services and facilities in major new developments
6. Green	6.1 Creation of green infrastructure in major new developments
infrastructure	6.2 Green Flag awards
	6.3 Amount of open space per person
7. Retail provision	7.1 Losses/gains of retail provision
8. Town and village centres	8.1 Mix of provision in main centres
9. Workforce and skills	9.1 Qualifications of pupils at end of Key Stage 4.
	9.2 % of working age population qualified to NVQ level 3 (or equivalent) or above.
	9.3 Provision of new education facilities

SA objective	Indicators
10. Employment & economy	10.1 Employment floorspace completed
	10.2 Number of business births and deaths
	10.3 Number of jobs
	10.4 Number of unemployed people as a percentage of all economically active people
	11.1 Employment floorspace completed
11. Employers and economy	11.2 Amount of available premises (as logged on vacant business property database)
	12.1 Number, size, type, and location of housing completions
12. Housing	12.2 Number of affordable housing completions
	12.3 Number and location of households on housing waiting list
	13.1 Percentage of development (housing/employment) on previously developed land
13. Best use of land	13.2 Number of homes gained/lost through conversions of existing buildings
	13.3 Development on agricultural land grades 1, 2, or 3a
	13.4 Development on contaminated land
	14.1 Mode of travel
14. Transport and travel	14.2 Congestion levels
	14.3 Key transport infrastructure improvements
15. Air quality	15.1 Number of air quality management areas.
16. Landscape and heritage	16.1 Development in designated areas
	16.2 Entries on Heritage at Risk register
47 0: 1: ::	17.1 Development in designated areas
17. Biodiversity	17.2 Condition of SSSIs

SA objective	Indicators
18. Flooding	18.1 Implementation of flood improvement measures in association with major new developments
J	18.2 Development in flood zones 2 and 3
19. Water & climate change	19.1 Domestic water consumption per person per day
	19.2 Ecological status of waterbodies
	20.1 Results of Code for Sustainable Homes and BREEAM assessments
	20.2 Renewable energy installations
20. Energy &	20.3 Per capita CO ₂ emissions
climate change	20.4 Percentage of household waste recycled or composted
	20.5 Amount of household waste sent to landfill
	20.6 Domestic consumption of electricity and gas