

Bledlow-cum-Saunderton Neighbourhood Plan 2016 – 2033

SUSTAINABILITY APPRAISAL REPORT

Incorporating Strategic Environmental Assessment



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August 2016

Bledlow-cum-Saunderton Neighbourhood Plan 2016-2033

Sustainability Appraisal/ Strategic Environmental Assessment (August 2016)

Contents

Non-Technical Summary

1. Introduction
2. Background to Sustainability Appraisal and Strategic Environmental Assessment
3. An outline of the contents and main objectives of the neighbourhood plan
4. The relevant aspects of the current state of local social, environmental and economic issues and their likely evolution without the plan
5. The environmental characteristics of the area likely to be significantly affected
6. Any existing social, economic or environmental problems that are relevant to the plan
7. The social, environmental and economic objectives that are relevant to the Neighbourhood Plan and how these have been taken into account during its preparation
8. A description of measures envisaged for monitoring

NON- TECHNICAL SUMMARY

1. The purpose of this Sustainability Appraisal is to provide an assessment of any significant social, environmental and economic effects resulting from the policies and proposals of the Bledlow-cum-Saunderton Neighbourhood Plan.
2. The Neighbourhood Plan contains a number of policies for the use and development of land in the Parish of Bledlow-cum-Saunderton in the plan period up to 2033. These policies, together with the policies of the Wycombe District Local Plan (as saved and extended (2007) and replaced by the adopted Core Strategy July 2008 and Delivery and Site allocations plan July 2013) and the National Planning Policy Framework (NPPF) will be used by the District Council to help determine planning applications once the Neighbourhood Plan is 'made' in due course. The Neighbourhood Plan has been informed by the reasoning and evidence base of the emerging Wycombe Local Plan.
3. The 'Submission' Neighbourhood Plan will be submitted by Bledlow-cum-Saunderton Parish Council (the 'Council') for examination under the Neighbourhood Planning (General) Regulations 2012 to the local planning authority, Wycombe District Council (WDC). The District Council issued a preliminary screening opinion on the 20th January 2016 requiring an SEA, and advising this should be focussed on the impacts of site allocations. The BcS PC have chosen to meet this obligation by preparing a Sustainability Appraisal (SA) under the Environmental Assessment of Plans & Programmes Regulations 2004.
4. While the Neighbourhood Plan falls within the zones of influence of the Chilterns Beechwoods and Ashton Rowant Special Areas of Conservation, Wycombe District Council also concluded in their supplementary Screening Opinion (August 2016) that in relation to the neighbourhood plan being subject to a Habitats Regulations Assessment (HRA) under the Habitats Directive (92/43/EEC the Neighbourhood Plan is unlikely to have significant environmental effects on any Natura 2000 sites alone or in combination with other plans and projects, and an Appropriate Assessment for the Bledlow-cum-Saunderton Neighbourhood Plan is not required.
5. A Sustainability Appraisal is a systematic process used to ensure the social and economic objectives of a plan are achieved in addition to environmental considerations. For completeness, the Neighbourhood Plan has been subject to a combined process whereby the SEA has been incorporated with a Sustainability Appraisal (SA/SEA) to consider the wider social and economic effects.
6. A Scoping Report, (as part of Stage A of the process – see Figure B below) was consulted upon for the minimum 5-week period during March and April 2016, in line with the Regulations. This contained the social, economic and

environmental baseline data is contained in the BcS SA/SEA Scoping Letter and Appendices dated February 2016.

7. The draft SA/SEA report was consulted upon at the same time as the Pre-Submission Neighbourhood Plan for a statutory 6 week period during June and July 2016 in accordance with the EA Regulations. Only minor comments were received, principally from WDC to help improve the textual clarity in one or two areas (principally regarding the descriptions of the Policy 3 – Molins policy options) and a suggestion that Policy 10 should be deleted. And comments from Buckinghamshire County Council(BCC) in terms of public transport accessibility, advising that the parish is served by acceptable sustainable transport options, which in itself strengthens the assessment of the accessibility of the proposed settlements. In addition, the assessment of Policy 3 was reviewed in the light of the amended details submitted for the Molins (St Congar) appeal hearing. The significance of these amendments have been considered.
8. This Report provides an assessment of the Neighbourhood Plan objectives and policies and seeks to do it in a way that is proportionate to this task and that recognises the limitations of the available data and means of measuring direct impacts. In terms of the assessment of options, the SA/SEA must be proportionate and “does not need to be done in any more detail ... than is considered to be appropriate for the content and level of detail in the neighbourhood plan” (National Planning Practice Guidance ID 11-031).
9. The above guidance makes clear that reasonable alternatives “must be realistic and deliverable” (ID 11-038). The ‘Council’ has therefore identified such alternatives for all the policies to demonstrate that it has followed this guidance. However, it is of the view that, given a neighbourhood plan must achieve a successful referendum vote in order to be made, some alternatives would not be ‘realistic’ as they would be very unlikely to secure the support of the local community.
10. As the Final SA/SEA Report, it has sought to respond to the comments received at Pre-Submission Stage and this Final SA/SEA Report has been amended accordingly. However, modifications to the report need only be considered where appropriate and proportionate to the level of change being made to the neighbourhood plan...and a change is likely to be significant if it substantially alters the draft plan and or is likely to give rise to significant environmental effects (ID: 11-42).
11. No such significant alterations have been deemed necessary given the minor amendments to policies resulting from the pre-submission consultation and outlined in the Regulation 14 Report. Policy 10 has been retained, as it is considered a policy area with strong community support. And the effect of modifications to option 1 of Policy 3 are similarly not considered significant given the minor nature of the changes proposed.

The Vision for the Parish in 2033

12. The Plan provides a framework to guide development within the Bledlow-cum-Saunderton Parish until 2033. This framework is based on and supports the following vision for the future of the parish:

“To achieve an incremental development of Bledlow-cum-Saunderton, which respects the rural nature of the parish and offers housing and social/economic opportunities for current and future generations”

13. The vision is largely inspired by the responses to the parish survey (in particular its section on the likes and dislikes of living in the parish), the feedback responses and more broadly by the interactions with residents during the preparation of the Plan.

Objectives

14. In order to deliver this vision, the neighbourhood plan working group has, in response to the community views and evidence collected, translated this vision into seven key objectives:
- A. To promote limited small housing development and proactively direct it to preferred land types.
 - B. To encourage development which addresses local housing and community infrastructure needs.
 - C. To ensure that development conforms to the strategy set for the management of the Landscape Character Areas present in the parish and protects the rural character and tranquillity of the parish and Chilterns Area of Outstanding Natural Beauty.
 - D. To ensure that the development of the built form integrates well with the predominant character of the established housing in the area, including listed buildings and those buildings of an historic and architectural interest to the parish.
 - E. To ensure that all new development within the parish is configured to optimise high-speed broadband connectivity, integrates energy efficient technologies and limits light pollution.
 - F. To support land-based and land-related rural businesses as well as home-based business/work.
 - G. To encourage appropriate employment use for land within the parish in support of local employment opportunities
 - H. To protect and enhance community assets (facilities, buildings and land).

15. In addition to the desire to address the objectives above through a range of policies, including policies to influence development within settlements and in countryside areas in the parish, the Parish Council and District Council wish to see the 'Molins' site – a major developed site in the greenbelt - put to beneficial use in line with National Planning Policy and the Wycombe development plan. For the purposes of the neighbourhood plan this must be done in a way which would be acceptable to the local community at referendum.
16. The main sustainability issues in the Parish to which the Neighbourhood Plan responds is managing change in a sensitive historic and landscape setting. The local community accepts that some new development may be required to continue to meet the needs for local housing and the local economy. Their preference is for this to be on brownfield/previously developed land, to be mixed use where this is possible and to make better use of sensitive infill within settlements. Development should protect views to and from the Chilterns AONB and not undermine the sensitive rural character and environment of the parish. The safeguarding and enhancement of community and social infrastructure is also a key local issue and development must seek to improve connectivity (physical and IT). In any event, development should be well located and be of a high quality of design.
17. There are no significant sustainability issues that are not also common to many parishes in rural England, especially in terms of access to affordable family housing. Bledlow-cum-Saunderton is a rural parish of approximately 2500 people spread over an area of about 10½ square miles in the north-west corner of Wycombe District in Buckinghamshire. It comprises the villages of Bledlow (including its conservation area), Bledlow Ridge and Saunderton and a number of hamlets and scattered housing surrounded mainly by farms, woodland and other open spaces.
18. 70% of the parish lies within the Chilterns Area of Outstanding Natural Beauty much of which is classified as Green Belt. Like other rural parishes within the District, Bledlow-cum-Saunderton is ranked within the 5% most deprived in England in respect of geographical barriers to services (distance to a doctors, shop, primary school & post office). The parish has one primary school, two village halls, three churches, three pubs and one shop. The importance of these designations has succeeded in constraining development in the parish so that it has retained its essential character.
19. The objectives have been chosen to provide a relevant framework within which to distinguish policy attributes and to compare them with any reasonable alternative policy approaches. They reflect the environmental characteristics of the parish and the intended focus of the Neighbourhood Plan. There are therefore some objectives that are common at the district level that are not included here, for example air quality, soil quality, healthy communities. The absence of these types of objective does not necessarily

mean that they are not of any value, but their inclusion would not have helped the assessment of the Plan's objectives and policies.

20. There is a strong correlation between the Plan objectives and those of the SA/SEA framework. The focus of the Plan objectives on supporting a range of residential accommodation, including the principle focus on C2 uses at Molins; the high quality and sympathetic design in settlements and also the support for rural diversification and employment to create more local jobs for the working population aligns well with a number of the SA/SEA objectives.
21. At the same time, the Plan objectives make clear that such development must not be at the cost of the special historic and landscape character of parish, hence the correlation between the landscape and heritage objectives and the equivalent SA/SEA objectives. The neutrality of the other objectives reflects the fact that the Plan has a key focus, with all other policy matters being secondary to its seven objectives.
22. In summary, none of the reasonable policy alternatives would lead to a better policy outcome than the proposed policies when assessed against the SA/SEA framework. In overall terms, therefore, the sustainability effects of the Neighbourhood Plan are generally assessed as positive or, at worst, neutral. The proposed mitigation measures of the policies, where necessary, will effectively avoid any negative impacts. Further, the very modest scale and location of the specific development policies of the Plan are such that there will likely be no cumulative effects on the area beyond the parish boundary.

1. Introduction

- 1.1. The purpose of this Sustainability Appraisal Report is to provide an assessment of any significant social, environmental and economic effects resulting from the policies and proposals of the Bledlow-cum-Saunderton Neighbourhood Plan ("The Plan") in accordance with the Neighbourhood Planning (General) Regulations and the EU Directive 2001/42 on Strategic Environmental Assessment (SEA). Plan A below shows the designated Neighbourhood Area, which coincides with the Bledlow-cum-Saunderton BcS Parish Council (BcS PC) boundary



Plan A: The Designated Neighbourhood Area

- 1.2. The 'Submission' Neighbourhood Plan will be submitted by Bledlow-cum-Saunderton Parish Council (the 'Council') for examination under the Neighbourhood Planning (General) Regulations 2012 to the local planning authority, Wycombe District Council (WDC). The District Council issued a preliminary screening opinion on the 20th January 2016 requiring an SEA, and advising this should be focussed on the impacts of site allocations. The BcS PC have chosen to meet this obligation by preparing a Sustainability Appraisal (SA) under the Environmental Assessment of Plans & Programmes Regulations 2004.
- 1.3. While the Neighbourhood Plan falls within the zones of influence of the Chilterns Beechwoods and Ashton Rowant Special Areas of Conservation, Wycombe District Council also concluded in their supplementary Screening Opinion (August 2016) that in relation to the neighbourhood plan being subject to a Habitats Regulations Assessment (HRA) under the Habitats Directive (92/43/EEC the Neighbourhood Plan is unlikely to have significant environmental effects on any Natura 2000 sites alone or in combination with other plans and projects, and an Appropriate Assessment for the Bledlow-cum-Saunderton Neighbourhood Plan is not required.
- 1.4. A Sustainability Appraisal is a systematic process used to ensure the social and economic objectives of a plan are achieved in addition to environmental considerations. For completeness, the Neighbourhood Plan has been subject to a combined process whereby the SEA has been incorporated with a Sustainability Appraisal (SA/SEA) to consider the wider social and economic effects.
- 1.5. A Scoping Report, (as part of Stage A of the process – see Figure B below) was consulted upon for the minimum 5-week period during March and April 2016, in line with the Regulations. This contained the social, economic and environmental baseline data is contained in the BcS SA/SEA Scoping Letter and Appendices dated February 2016.
- 1.6. The draft SA/SEA report was consulted upon at the same time as the Pre-Submission Neighbourhood Plan for a statutory 6 week period during June and July 2016 in accordance with the EA Regulations. Only minor comments were received, principally from WDC to help improve the textual clarity in one or two areas (principally regarding the descriptions of the Policy 3 – Molins policy options) and a suggestion that Policy 10 should be deleted. And comments from Buckinghamshire County Council (BCC) in terms of public transport accessibility, advising that the parish is served by acceptable sustainable transport options, which in itself strengthens the assessment of the accessibility of the proposed settlements. In addition, the assessment of Policy 3 was reviewed in the light of the amended details submitted for the Molins (St Congar) appeal hearing. The significance of these amendments have been considered.

- 1.7. This Report provides an assessment of the Neighbourhood Plan objectives and policies and seeks to do it in a way that is proportionate to this task and that recognises the limitations of the available data and means of measuring direct impacts. In terms of the assessment of options, the SA/SEA must be proportionate and “does not need to be done in any more detail ... than is considered to be appropriate for the content and level of detail in the neighbourhood plan” (National Planning Practice Guidance ID 11-031).
- 1.8. The above guidance makes clear that reasonable alternatives “must be realistic and deliverable” (ID 11-038). The ‘Council’ has therefore identified such alternatives for all the policies to demonstrate that it has followed this guidance. However, it is of the view that, given a neighbourhood plan must achieve a successful referendum vote in order to be made, some alternatives would not be ‘realistic’ as they would be very unlikely to secure the support of the local community.
- 1.9. As the Final SA/SEA Report, it has sought to respond to the comments received at Pre-Submission Stage and this Final SA/SEA Report has been amended accordingly. However, modifications to the report need only be considered where appropriate and proportionate to the level of change being made to the neighbourhood plan...and a change is likely to be significant if it substantially alters the draft plan and or is likely to give rise to significant environmental effects (ID: 11-42).
- 1.10. No such significant alterations have been deemed necessary given the minor amendments to policies resulting from the pre-submission consultation and outlined in the Regulation 14 Report. Policy 10 has been retained, as it is considered a policy area with strong community support. And the effect of modifications to option 1 of Policy 3 are similarly not considered significant given the minor nature of the changes proposed.

2. Background to Sustainability Appraisal & Strategic Environmental Assessment

- 2.1. Through the SA/SEA the social, environmental and economic effects of the Neighbourhood Plan are tested to ensure that these promote Sustainable development and the Plan avoids causing any significant environmental effects.
- 2.2. The combined process involves a simple evaluation of the social, economic and environmental impacts of the plan as follows:
- An outline of the contents, main objectives of the plan, and relationship with other relevant plans or programmes
 - The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan
 - The social, economic and environmental characteristics of areas likely to be significantly affected
 - Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance
 - The environmental protection objectives, established at international, community or national levels, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation
 - The likely significant effects on the local economy, society and the environment
 - The Measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the plan
 - 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
 - A description of measures envisaged concerning monitoring
- 2.3. The methodology for the assessment is intended to be proportionate to the task of assessing the development proposals of a Neighbourhood

Plan covering a relatively small area. A summary of the process, as derived from the 2004 guidance is contained in Table 1 below.

Table 1: The Combined SA/SEA Process	
Scoping	<p>STAGE A: This stage sets the context of the assessment by identifying the baseline data and establishing the scope of the assessment.</p> <ol style="list-style-type: none"> 1. Identification of relevant plans, policies and programmes. Any existing requirements that need to be taken into account or incorporated into the plan are identified. 2. Review of baseline information. Data about environmental, social and economic issues is collected, together with an indication as to how this may change in the future without the plan or programme under preparation. 3. Identification of Sustainability Issues. The review of plans and policies, together with the baseline information are used to identify the key sustainability issues which could impact on the plan. 4. Development of the SA/SEA Framework. The assessment criteria used to assess the impact of the plan or programme. 5. Identification of initial plan options. Taking into account best practice initial identification of options and reasonable alternatives undertaken. 6. Consultation. On the scope and alternatives for assessment it is necessary to consult statutory consultees, that is Natural England, Historic England and the Environment Agency.
Assessment	<p>STAGE B: This stage involves the assessment of the any likely significant effects of the plan policies (and any reasonable alternatives) on the key sustainability issues identified.</p> <ol style="list-style-type: none"> 1. Finalisation of the Plan options and alternatives for testing 2. Testing the Plan Objectives against the SA/SEA Framework. The Plan Objectives are tested to ensure compliance sustainability principles 3. Evaluation of plan options and alternatives. The SA/SEA Framework is used to assess various plan options by identifying the potential sustainability effects of the plan and assist in the refinement of the policies. 4. Predicting and evaluating the effects of the plan. To predict the significant effects of the plan and assist in the refinement of the policies. 5. Consideration of ways to mitigate adverse effects and maximise beneficial effects. To ensure that all potential

	<p>mitigation measures and measures for maximising beneficial effects that are identified.</p> <p>6. Proposing measures to monitor the significant effects of implementing the Plan: To detail the means by which the sustainability performance of the plan can be assessed and monitored.</p> <p>This assessment is used to feed into the development of a plan or programme to help ensure the most sustainable option is selected. The SA/SEA framework is also used to assess the sustainability implications of the draft policies and the results used to inform policy development.</p>
Reporting	<p>STAGE C: Preparation of the SA/SEA Report</p> <ul style="list-style-type: none"> The findings of the assessment together with how it has influenced the development of the plan are identified and set out in a draft environmental report together with the recommendations on how to prevent, reduce, or offset any significant negative impacts arising from the plan. <p>STAGE D: Consultation – seek representations from consultation bodies and the general public</p> <ul style="list-style-type: none"> This is an ongoing process. Consultation of the draft SA/SEA Report is taken into account and used to influence further iterations of the sustainability appraisal process.
Adoption and Monitoring	<p>STAGE E: Monitoring</p> <p>Following adoption of the Plan, the significant effects of implementing the plan are measured and any adverse effects are responded to. The results are fed into the future plans and sustainability appraisals.</p>

- 2.4. Since the Scoping Stage A was completed, the focus has been on spatial strategy choice and policy formation including policies to guide development in settlements and for the 'Molins' site, a 'major developed site in the greenbelt'. As discussed in Section 7, alternative approaches have been assessed for the Molins site using the SA/SEA framework, amongst other factors, and the framework has been used to compare the other policies with a 'policy off' alternative. The neighbourhood plan Working Group have worked closely with WDC in the formulation of policies to ensure their general conformity and soundness.

3. An outline of the contents, main objectives of the Neighbourhood Plan and relationship with other relevant plans or programmes

- 3.1. The Neighbourhood Plan contains a number of policies for the use and development of the land in Bledlow-cum-Saunderton Parish in the plan period up to 2033. These policies, together with the policies of the Wycombe District Consolidated Local Plan and the National Planning Policy Framework (NPPF) will be used by Wycombe District Council to help determine planning applications once the Neighbourhood Plan is 'made' in due course. The Neighbourhood Plan vision and objectives have been informed by the reasoning and evidence of the emerging Wycombe Local Plan.

Vision and Objectives

- 3.2. The Plan provides a framework to guide development within the Bledlow-cum-Saunderton Parish until 2033. This framework is based on and supports the following vision for the future of the parish:

"To achieve an incremental development of Bledlow-cum-Saunderton, which respects the rural nature of the parish and offers housing and social/economic opportunities for current and future generations"

- 3.3. The vision is largely inspired by the responses to the parish survey (in particular its section on the likes and dislikes of living in the parish), the feedback responses and more broadly by the interactions with residents during the preparation of the Plan.

Objectives

- 3.4. In order to deliver this vision, the Working Group has, in response to the community views and evidence collected, translated this vision into seven key objectives:
- A. To promote limited small housing development and proactively direct it to preferred land types.
 - B. To encourage development which addresses local housing and community infrastructure needs.
 - C. To ensure that development conforms to the strategy set for the management of the Landscape Character Areas present in the parish and protects the rural character and tranquillity of the parish and Chilterns Area of Outstanding Natural Beauty.
 - D. To ensure that the development of the built form integrates well with the predominant character of the established housing in the area,

including listed buildings and those buildings of an historic and architectural interest to the parish.

- E. To ensure that all new development within the parish is configured to optimise high-speed broadband connectivity, integrates energy efficient technologies and limits light pollution.
- F. To support land-based and land-related rural businesses as well as home-based business/work.
- G. To encourage appropriate employment use for land within the parish in support of local employment opportunities
- H. To protect and enhance community assets (facilities, buildings and land).

3.5. At the national level, the National Planning Policy framework (NPPF) published by the Government in 2012 is an important guide in the preparation of local plans and neighbourhood plans. The BcS NP must demonstrate that it is consistent with the provisions of the NPPF. The following paragraphs of the NPPF are especially relevant to the Plan:

- The role of neighbourhood plans (paragraph 16)
- Supporting a prosperous rural economy (paragraph 28)
- Delivering a wide choice of high quality homes (paragraph 50)
- The vitality of rural communities (paragraph 55)
- Good design (paragraph 58)
- Protecting healthy communities (paragraph 70)
- Protecting local green spaces (paragraph 76)
- Protecting the Green Belt (paragraphs 79-89)
- Conserving and enhancing the natural environment (paragraphs 109-116)
- Conserving and enhancing the historic environment (paragraph 126)
- Neighbourhood planning (paragraphs 183-185)
- WDC has planning policies that are helping to shape the strategy and policies of the Neighbourhood Plan and these are set out in Section 3 of the Submission Plan. The Plan must be in general conformity with the strategic policies of the development plan. The current development plan includes:
 - Wycombe District Local Plan (as saved and extended (2007) and replaced by the adopted Core Strategy July 2008 and Delivery and Site allocations plan July 2013)
 - Wycombe Core Strategy (2008)
 - Delivery and Site Allocations Plan for Town Centres and Managing Development (2013)
 - Buckinghamshire Minerals and Waste Core Strategy 2012
 - Buckinghamshire Minerals and Waste Local Plan (2004-2016 - part retained).

- 3.6. The policies that have specific relevance to the BcSNP are listed in the Submission Plan at paragraph 3.8.
- 3.7. The policies of the Neighbourhood Plan have been prepared to deliver the vision and objectives set out in paragraph 3.2 and 3.4 above, which in turn are intended to complement and update the policies of the Wycombe development plan and respond to new evidence such as the Wycombe Housing and Economic Development Needs Assessment published in January 2016.
- 3.8. To ensure the Neighbourhood Plan will continue to be relevant after 2017, when the new Wycombe Local Plan will be submitted for examination, it is critical that the neighbourhood plan reflects the reasoning and evidence base of the emerging Local Plan.
- 3.9. Consultation on the Wycombe District Draft Local Plan is intended to commence in June 2016 following the options consultation in February 2014. The Draft Local Plan is scoped around the following six themes:
 - Cherish the Chilterns
 - Improve connectivity
 - Facilitate infrastructure
 - Foster the economy
 - Accommodate housing
 - Champion town centres
- 3.10. There is scope within the existing and forthcoming policy framework to contribute to a number of these themes in order that the neighbourhood plan complements the Local Plan with additional proposals, especially in respect of the delivery of alternative proposals for the 'Molins' site (Policy GB9).
- 3.11. In November 2015, WDC decided to abandon work on the Saunderton Area Action Plan and to develop policies for this area within the neighbourhood plan. This provided a significant opportunity for the future development of the former 'Molins' factory site - a major developed site in the Green Belt - and subject to a forthcoming appeal for the non-determination of a 212 dwelling planning application (APP/K0425/W/15/3135297) - to be informed by the emerging evidence of the Housing and Economic Development Needs Assessment as well as the views of the local community. An informal neighbourhood plan consultation was undertaken in January 2016 which sought community views on the options for this site.
- 3.12. The Chilterns AONB Management Plan 2014 – 2019 also provides a relevant context for the Neighbourhood Plan. The AONB was originally designated in 1965 and extended to cover an area of 833 sq. km. following a boundary review in 1990. The Management Plan sets out

objectives for the management of the AONB agreed through consultation. The achievement of these objectives and their associated policies requires the support and involvement of many other organisations and individuals who have key parts to play in the future of the area.

- 3.13. In addition to the desire to address the issues above through a range of policies, including policies to influence development within settlements and in countryside areas of the parish, the Parish Council and District Council wish to see the 'Molins' site put to beneficial use in line with National Planning Policy and the Wycombe development plan. For the purposes of the neighbourhood plan this must be done in a way which would be acceptable to the local community at referendum.
- 3.14. The 'Molins' site was originally developed for war time weapon manufacturing during the Second World War. From 1950 to 2008 the site was owned and used by Molins for the manufacture of cigarette vending machines. In 2008 the factory was closed and the site was purchased by E Shelter a data centre developer/operator and planning consent for a data centre was approved (08/05740/FULEA). However, the Data Centre did not progress but as a result all but two of the buildings on the site – totalling approximately 2500sq.m - were subsequently demolished to their foundations after planning approval had been granted for the data centre development but no further development took place although WDC confirmed the consent had been 'lawfully commenced'¹
- 3.15. The 'Molins' site is defined as a 'major developed site within the green belt' within Policy GB9 of the Wycombe Core Strategy. Although redevelopment of the site should not compromise the purposes of the Green Belt, under the terms of the policy, limited infilling is acceptable that supports economic activity and proposals should ideally reduce the the impact of the site on the openness of the Green Belt: seek opportunities to improve the landscape, historic and nature conservation interests and improve access to and from the site – particularly to Saunderton Rail Station.
- 3.16. Given the significance of the 'Molins site', Section 7 of this report undertakes a comparative assessment of Policy 3 – Molins, South Saunderton - in the Submission Plan. The assessment of Policy 3 has been reviewed since publication of the Draft SA/SEA report to reflect the amended proposals now submitted to the appeal hearing Option 1 below (See Section 7 for further details).
- 3.17. Policy 3 in the Submission Plan proposes two alternative levels of development, which would either see little redevelopment of the site (option 2 totaling approximately 2500m2) or a comprehensive mixed use development (Option 3) which includes strategic and local open space

¹ E-Shelter (UK) Ltd. Planning Potential Statement, Date Centre, Haw Lane: GVA March 2013

provision. These provide reasonable alternatives upon which the community were asked to give their views during the informal community consultation and parish survey; namely:

- Option 1 – C3 residential development only (192 dwellings - St Congar Planning Application 15/05250/OUTEA – Revised July 2016)
- Option 2 – C3 residential development of a scale equivalent to 2500m² of building footprint (footprint area based on WDC assessment of built development on site)
- Option 3 – Mixed use predominately C2 retirement village with some C3 residential, B1 employment and community facilities as the Indicative Land Use Diagram in Submission Plan (Plan F)

3.18. These three options ('reasonable alternatives') will be assessed having regard to the emerging evidence base supporting the Local Plan and Neighbourhood Plan.

4. The relevant aspects of the current state of local social, environmental and economic issues and the likely evolution thereof without the implementation of the Neighbourhood Plan

- 4.1. The main sustainability issues in the neighbourhood area are set out in the Vision Workshop Note (Appendix A of the SA/SEA Scoping Report) under the heading 'How the Parish works?'. This sets out how the various settlements in the parish operate and the issues the parish is likely to face in the future without the Plan. Agriculture and forestry are the predominant land uses in the parish and are likely to remain so.
- 4.2. The local community accepts that some new development is required to continue to meet the needs for local housing and the local economy. Their preference is for this to be on brownfield/previously developed land such as at the old Molins factory site, for it to be mixed use where the scale of development makes this possible, and to make better use of sensitive infill development within settlements. There is also a need to better manage agricultural development to encourage sensitive rural diversification and to protect the openness of the countryside.
- 4.3. During the period 2006-2015 extensions were by far the most common form of housing development which took place in the parish. During the same period some 80 planning applications were made for the construction of one or more houses, many of which were rebuilds of existing residential and non-residential development. Excluding the yet-to-be-built 42 houses on the brownfield site of Wests Yard in Saunderton, the net increase of the parish housing stock over the last 10 years totals some 40 houses. At the same time the parish has few non-agricultural employment sites and has experienced a pattern of continuing loss of light industrial and small businesses units over the last 30 – 40 years.
- 4.4. Any new development should protect views to and from the CAONB and not undermine the sensitive rural character and historic environment of the parish. The safeguarding and enhancement of local community and social infrastructure is also a key local issue and development must seek to improve connectivity (physical and IT). In any event, development should be well located and be of a high quality. Many of these parish specific issues reflect the wider sustainability issues across the district described in paragraph 3.21 of the Wycombe District Local Plan SA/SEA Scoping Report dated October 2013.
- 4.5. Without the Neighbourhood Plan, proposals for development would be left to individual planning applications, and opportunities to manage change positively and cumulatively in the parish may be lost.

5. The environmental characteristics of areas likely to be significantly affected

- 5.1. Bledlow-cum-Saunderton is a rural parish spread over an area of about 10½ square miles in the north-west corner of WDC's area in Buckinghamshire. It comprises the villages of Bledlow (including its conservation area), Bledlow Ridge and Saunderton and a number of hamlets and scattered housing surrounded mainly by farms, woodland and other open spaces.
- 5.2. 70% of the parish lies within the Chilterns Area of Outstanding Natural Beauty much of which is classified as Green Belt. Like other rural parishes within the District, Bledlow-cum-Saunderton is ranked within the 5% most deprived in England in respect of geographical barriers to services (distance to a doctors, shop, primary school & post office). The parish has one primary school, two village halls, three churches, three pubs and one shop.
- 5.3. The parish has a population of approximately 2,500 people living in 1,000 houses. The most common house type within the parish is detached property, with 43% of total residents owning their property outright.
- 5.4. The nearest towns are Princes Risborough and Chinnor (in Oxfordshire), with which the parish shares boundaries. Both towns (and in particular Princes Risborough where the current plan suggests 2,500 new houses, representing an increase of 70% in the town's population) are currently the subject of development plans which would see their respective geographical footprints and populations grow significantly. Princes Risborough is used by a number of parish residents for their day-to-day shopping needs and for access to critical services like doctors, pharmacies, post office, etc. Thame in Oxfordshire and Wycombe are also popular shopping destinations.
- 5.5. There is a great deal of evidence of prehistoric activity in the parish, which has the largest concentration of Bronze Age barrows outside of Wessex. Historic maps show that over the last 150 years the parish has maintained a majority of the open spaces which are now part of the Chilterns Area of Outstanding Natural Beauty (AONB), and have only slightly changed over the years.
- 5.6. The parish contains 63 listing entries on the National Heritage List for England. Some of these are for more than one building, but the list includes one Grade I and four Grade II* sites. 21 listed buildings are included in the Bledlow Settlement Area (19 of these are within the Conservation Area), including one Grade I and one Grade II*. There are 6 listed buildings and 1 locally listed building in the Pitch Green Settlement Area. 3 Grade II listed buildings are included in the Bledlow Ridge

Settlement Area. The parish also includes 14 scheduled ancient monuments.

- 5.7. Large parts of the parish are included in the following Landscape Character Areas, which individually and collectively define many of the key characteristics of the parish:
- Longwick Vale
 - Risborough Chalk Foothills
 - Wain Hill Chalk Escarpment
 - Bledlow Ridge Dip Slope with Dry Valleys
 - Wye Chalk River Valley.
- 5.8. It is difficult to assess either the individual or cumulative effects of the Plan policies. Rather, the policies should avoid any obvious environmental harm in terms of the proximity of development proposals to the natural or heritage assets referred to above. Thereafter, the expectation is that planning applications in future will be screened for the need for Environmental Impact Assessment and other assessments (e.g. heritage) and they will be determined using the development management policies of the Plan and of other development plan documents. Should any proposals of the Plan not be consented in due course, as they cannot overcome over-riding environmental problems, then future reviews of the Plan will consider replacing them with new proposals.

6. Any existing social, economic or environmental problems that are relevant to the Neighbourhood Plan

- 6.1. There are a number of problems in the parish that are within the remit of the Neighbourhood Plan (or the land use planning system more generally) to resolve:
- Houses are being extended in part as a function of planning restrictions and, as a result, the stock of smaller and more affordable homes is reducing.
 - There is a need for flexible housing policy that allows for growing families, a need for more smaller houses that have flexibility to grow, and a need to create 'churn' in the local housing market by providing more houses suitable for downsizing to suit older households
 - The demographic profile of the parish is reasonably balanced, but there is a jobs/housing mismatch as a result of a steady loss of business premises in the parish
 - Farm buildings are being used for office/industrial use and reflect changes in agricultural practices driven by external economic forces
 - Hence there is an important connection to be made between the countryside, planning and farming diversity, as the rural economy has particular needs.
 - There is a loss of community facilities all over the parish
- 6.2. These issues are common to many rural neighbourhood plans, but exacerbated in this case by restrictive planning policies which reflect the environmental designations that apply in the parish.
- 6.3. This planning context and the community engagement work has however defined a number of issues which will define the plan and its policies. These are:
- a limited appetite for significant housing growth and a preference for creating modest new housing within existing settlements
 - a desire to rebalance the housing stock by building a higher proportion of smaller homes
 - a wish to cater for the needs of an older population whilst at the same time attracting younger families to the parish
 - a desire to improve the quality of development within the parish whilst preserving the parish's rural character
- 6.4. The challenge for the Plan is to promote housing, economic and community infrastructure development within these high environmental constraints. Ensuring the right balance is struck between economic, social and environmental objectives and that the opportunity for the local community to define what it considers to be sustainable development provided by the Localism Act, is not missed.

7. The social, environmental and economic objectives that are relevant to the Neighbourhood Plan and the way those objectives and considerations of its sustainability have been taken into account during its preparation

- 7.1. To assess the sustainability performance of the Neighbourhood Plan, the following assessment framework has been adopted. The proposed framework was consulted upon with the statutory consultees as part of the SA/SEA Scoping Report and it has been modified to take into account their comments. It draws on a number SA/SEA Objectives contained within the SA/SEA Scoping Report of the Wycombe District Local Plan (October 2013) so that, where possible and relevant, data sets can be shared for ongoing monitoring purposes.

Table A: SA/SEA Appraisal framework:

Neighbourhood Plan SA/SEA Objectives	Neighbourhood Plan SA/SEA Measures
1. Housing	<p>To provide an adequate supply of open market and affordable homes of different types and tenure to meet local needs.</p> <p>1A - Will the BcSNP improve the availability of market and affordable housing?</p> <p>1B – Will the BcSNP provide a range of housing types of various sizes and tenures?</p> <p>1C – Will the BcSNP provide housing suitable for local needs?</p>
2. Community Facilities	<p>To ensure everyone has access to appropriate educational, leisure and community facilities:</p> <p>2A - Will the BcSNP protect and sustain the provision of community facilities?</p> <p>2B – Will the BcSNP improve access to education, leisure and community facilities?</p>
3. Biodiversity	<p>To protect and enhance the quality and level of biodiversity and natural habitats within the parish and provide access to new green infrastructure.</p> <p>3A - Will there be any loss to biodiversity, flora or fauna as a result of the BcSNP either directly or</p>

	<p>through habitat fragmentation?</p> <p>3B - Will the BcSNP use the management of surface water to enhance water quality and biodiversity</p> <p>3C – Does the BcSNP improve access to the countryside, green infrastructure and biodiversity</p>
4. Landscape and Villagescape	<p>To conserve and enhance the quality of landscape and village character in the Parish:</p> <p>4A - Does the BcSNP seek to protect and enhance protected and important landscapes?</p> <p>4B - Will development result in loss of, improvement to or deterioration of the quality of the landscape or village scape?</p>
5. Cultural Heritage	<p>To conserve and enhance the quality and distinctiveness of the historical and cultural environment of the parish:</p> <p>5A - Does the BcSNP protect and enhance designated and non-designated features of historical or cultural interest? (e.g. listed buildings, non-scheduled archaeological sites, ancient monuments, Conservation Areas and historic landscapes)</p> <p>5B - Are settings and views of heritage assets maintained?</p> <p>5C - Does the BcSNP respect, maintain and strengthen local character and distinctiveness?</p>
6. Rural Economy and employment	<p>To support rural diversification and to increase employment opportunities in the parish.</p> <p>6A - Will the BcSNP support new employment related uses suited to a countryside or AONB location?</p> <p>6B – Will the BcSNP support rural diversification and the needs of the local farming community?</p> <p>6C – Does the BcSNP reduce the need to travel and for all purposes and seek to increase self-containment?</p>

- 7.2. The objectives have been chosen to provide a relevant framework within which to distinguish policy attributes and to compare them with any reasonable alternative policy approaches. They reflect the environmental characteristics of the area and the intended focus of the Neighbourhood Plan. There are therefore some objectives that are common at the district level that are not included here, for example air quality, soil quality, healthy communities.
- 7.3. Although there are some biodiversity assets in the designated area, Natural England have confirmed that the plan is unlikely to harm any Site of Special Scientific Interest (SSSI) or Special Area of Conservation (SAC) and the BcSNP is not likely to significantly affect the interest features for which they are notified. They state that given the main allocation for development, which the plan anticipates will likely be away from the areas designated for their biodiversity interest, landscape impacts will likely still need consideration for infill development in the villages of Bledlow and Saunderton among the other smaller villages.
- 7.4. Historic England confirm there are extensive heritage and archaeological assets in the parish, both listed and locally significant. They reinforce the importance of both the conservation and enhancement of the historic environment as an integral component of sustainable development, and recommend the use of character appraisal to inform the detailed design of new development.
- 7.5. The Chilterns AONB whilst not having detailed comments, signpost the plan to their range of guidance documents intended to influence the design of development. Similarly, the Environment Agency signpost relevant sections of National Planning Guidance should there be cases where the plan intends to allocate sites in Flood Zones 2 and 3 – which it does not.
- 7.6. More generally, in most cases, it is acknowledged that data is not collected or reported at the neighbourhood plan scale to enable a sensible assessment. This makes the identification of cause-and-effect relationships between inputs and outputs very uncertain. However, the assessment does seek to identify the relative attributes of the policies of the Neighbourhood Plan to inform the reader.

Assessing the impact of the Neighbourhood Plan Strategic Objectives

- 7.7. The seven strategic objectives of the Neighbourhood Plan are outlined in para 3.4. They cover a range of economic, environmental and social issues in support of realising the community's vision for the neighbourhood area. Each of these objectives is assessed against the SA/SEA objectives in Table B overleaf.

	SA/SEA Objectives	Housing	Community facilities	Biodiversity	Landscape and Villagescape	Cultural Heritage	Rural economy and employment
		1	2	3	4	5	6
	Plan Objectives:						
A	Provide for limited small housing development						
B	Local housing and community infrastructure						
C	Protecting landscape character & Chilterns AONB						
D	Ensure development integrates with the historic environment						
E	Supporting IT connectivity and energy efficient design						
F	Support rural and home based businesses						
F	Protecting and enhancing community assets						
Key	Positive	Neutral	Negative				

Table B: Assessment of Neighbourhood Plan Objectives

- 7.8. There is, unsurprisingly, a correlation between the Plan objectives and those of similar intent in the SA/SEA framework. The focus of the Plan objectives on supporting a range of residential accommodation, including the principle focus on C2 uses at Molins; the high quality and sympathetic design in settlements and also the support for rural diversification and employment to create more local jobs for the working population aligns well with a number of the SA/SEA objectives.
- 7.9. At the same time, the Plan objectives make clear that such development must not be at the cost of the special historic and landscape character of parish, hence the correlation between the landscape and heritage objectives and the equivalent SA/SEA objectives. The neutrality of the

other objectives reflects the fact that the Plan has a key focus, with all other policy matters being secondary to its seven objectives.

Assessing the impact of the Neighbourhood Plan policies

- 7.10. The Neighbourhood Plan contains fourteen policies intended to provide social, economic and/or environmental benefits. Using the sustainability framework outlined in Section 7 (Table A), the assessment of each policy is summarised below. The assessment is of the proposed policies with their mitigation measures.
- 7.11. For the purpose of Policy 3, three options (reasonable alternatives) have been considered as they were presented in the parish survey and consultation. For the remaining thirteen policies a simple 'policy on', 'policy off' approach is used.
- 7.12. Table C illustrates a comparative assessment of the Submission Neighbourhood Plan Policy 3 – Molins, South Saunderton against two reasonable alternatives. These are:
- Option 1 – C3 residential development only (192 dwellings - St Congar Planning Application 15/05250/OUTEA – Revised July 2016)
 - Option 2 – C3 residential development of a scale equivalent to 2500m² of building footprint (footprint area based on WDC assessment of built development on site)
 - Option 3 – Mixed use predominately C2 retirement village with some C3 residential, B1 employment and community facilities as the Indicative Land Use Diagram in Submission Plan (Plan F)
- 7.13. The first option is based on the St Congar application of 192 dwellings (C3) which is the subject of an appeal (APP/K0425/W/15/3135297) and scheduled to be heard in September 2016.
- 7.14. In July 2016, solicitors acting on behalf of the developer St Congar, notified the Parish Council of minor amendments to the appeal proposal (principally a reduction in housing number from 212 to 192 and amendments to layout). These revisions referred to as "minor variations" in the notification letter were published and representations from the public were invited on the revised documents.
- 7.15. The 'minor nature' of these amendments and the conclusions of the revised landscape and visual impact appraisal indicates only 'minor adjustments' to the original conclusions. As a consequence the conclusion of the Environmental Statement Non-Technical Summary² also remain unchanged and the Non Technical Summary confirms in para

² Former Molins Site, NTS of the Environmental Statement: PPML Ltd (Addendum July 2016)

3.18 that “Fundamentally, the variations do not materially change the development proposed in the Appeal”. A review of the options assessment similarly results in no material changes to the significance of effects indicated in Table C and they remain as published at Pre-Submission Stage.

- 7.16. The second option is based on the footprint of the remaining buildings on the site following the demolition of most of the Molins factory as described in the Submission Plan para 5.41 (i)
- 7.17. The third option is as set out in Policy 3 and as described in the Submission Plan para 5.41 (ii) and illustrated by Plan F on page 33 of the Submission Plan.

BCS NP - Policy 3' Molins' Reasonable Alternatives						
SA/SEA Objectives		Option 1	Option 2	Option 3		
		C3 Residential development (192 dwellings)	C3 Residential development of a scale equivalent to 2500m2	Mixed use predominately C2 retirement village with some C3 residential, B1 employment and community facilities		
1	Housing	++	+	++		
2	Community Facilities	0	0	+		
3	Biodiversity	0	0	+		
4	Landscape and Villagescape	-	++	0		
5	Cultural Heritage	0	0	0		
6	Rural Economy and Employment	--	0	++		
Key	Strong Positive ++	Positive +	Neutral 0	Negative -	Strong negative --	Uncertain ?

Table C: Assessment of Policy 1 reasonable alternatives

- 7.18. The assessment of the reasonable alternatives illustrates that option 1 and 3 fair reasonably equally in terms of their potential to deliver residential accommodation. While option 1 provides for considerably greater quantum of market housing, option 3 delivers a broader mix of residential accommodation based on C2 and C3 uses. This is in line with the

Buckinghamshire HEDNA evidence published in January 2016. Option 2 will provide a more modest quantum of housing at a scale that is less significant to the needs of the district.

- 7.19. Both option 1 and 2 are assessed as having a neutral effect on the provision of community facilities and also enhancing biodiversity and access to green infrastructure, the latter option due to the scale of development proposed. In comparison Option 3 is positive in relation to community facilities and biodiversity effects by including a community facility to serve both the scheme and the existing residential area of South Saunderton and environmental enhancements in the immediate area.
- 7.20. All options fair equally on their neutral effect on cultural heritage, given the proximity of the Bronze Age Round Barrow within the site boundary and acknowledging that conserving heritage assets is both a statutory requirement and a core planning principle.
- 7.21. Where the options differ most significantly is in relation to their effects on the Landscape/Villagescape and the Rural Economy and Employment.
- 7.22. Clearly any development on the site is likely to have effects on local landscape character and on the Chilterns AONB. However, the character and layout of the option 1 proposals are considered to have the greatest effect on the landscape due to the quantum, density and design of the proposals, such that the option fails to strengthen local character, respect the sites rural nature nor contribute to conserving the landscape of the the Chilterns AONB. Option 2 is considered to have a strong positive effect given the very limited quantum of development whereas the 'lose fit' layout of option 3 and the complementary landscape proposals are considered to ensure that the development overall has a neutral effect in the landscape.
- 7.23. As the neighbourhood plan policy indicates, appropriate policy mitigation has been included in option 3 to ensure the effects of development on the landscape setting are moderated sufficiently. This is not considered to be possible for option 1 which does not offer a means of moderating the landscape impact to minimise the effects on the Chilterns AONB given the quantum, density and design of the scheme.
- 7.24. In relation to the Rural Economy and Employment objective, the differences in the effects of each option are even more marked. Option 1 is considered to have a strong negative effect given it excludes any employment related uses; is likely to increase transport effects significantly on the local road network and as a result is likely to reduce the self-containment of the parish. On balance Option 2 is considered to have a neutral effect on this objective given the modest scale of development and the minimal transport effects that would result.

- 7.25. Option 3 however has a number of strong positive effects in relation to the economy and employment given that, the C2 uses generate local employment, have less transport effects than C3 residential uses and includes proposals for business premises to support start-up and micro-business uses. Perhaps most significantly, all the proposed uses included in the policy are likely to have positive effects on self-containment by reducing negative transport effects and supported by a pedestrian and cycle link to Saunderton Station.
- 7.26. In overall terms, Option 3 is assessed as being the most consistent with the neighbourhood plan vision and objectives. If allocated, the site will deliver much needed sheltered, care and downsizer homes, a modest amount of residential development, community facilities and employment development. This combination of uses together with the development principles contained in the policy offers a considered approach to the development of the Molins site and would mean that the development could be accommodated in a manner that responds to and respects the special character and natural beauty of the AONB. As such the positive social and economic benefits of the policy allocation are considered to outweigh any potential harm.

Assessment of Policies 1, 2 and 4 to 14 and their reasonable alternatives

	SA/SEA Objectives	Housing	Community facilities	Biodiversity	Landscape and Villagescape	Cultural Heritage	Rural economy and employment
		1	2	3	4	5	6
	Neighbourhood Plan Policies:						
1	Spatial Plan for the Parish						
2	Development within Settlements						
4	Design Management in Bledlow Village and Pitch Green						
5	Design Management in Bledlow Ridge						
6	Design Management in the Parish						
7	Sustainable Design in the Green Belt						
8	Rural Diversification						
9	Employment						
10	Environment						
11	Community Facilities						
12	Bledlow Ridge School						
13	Connecting the Parish						
14	Renewable and Low Carbon Energy						
Key	Positive	Neutral	Negative				

Table D: Assessment of BCS Neighbourhood Plan Policies

- 7.27. In respect of Policy 1, the assessment is generally positive in that the proposed Development Boundaries proposed around the four settlements will provide for housing, economic and community developments that are consistent with the vision for the parish, but it will continue to constrain growth to avoid any significant incursion into the

countryside and the Chilterns AONB. That constraint will also avoid larger scale developments that cannot be served by the local roads and infrastructure. The only reasonable alternative to the policy is to maintain the status quo which would not enable modest development to take place within settlements and therefore limit the positive effects of the policy.

- 7.28. Policy 2 is intended to support modest infill development within the settlements whilst preserving their essential open character with no reasonable alternatives other than to maintain the current Wycombe policy position. The primary purpose is to support modest housing development that is sympathetic to local character and of a type that will support the needs of younger families. This policy therefore makes the necessary provision for new development that may otherwise have been more difficult to justify without the policy and on an individual application basis and that is why a positive policy is considered necessary. Hence it offers a positive response to SA/SEA 1 to 4.
- 7.29. Policies 4, 5 and 6 seek to manage the design of development proposals within the settlements and across the parish as a whole - including the setting of each settlement and the visual relationship between the settlement and the Chilterns AONB. As such, the policies assess well against the SA/SEA biodiversity, landscape and heritage objectives but will also ensure the special character of Bledlow Village is maintained.
- 7.30. The only alternative to the policies 4, 5 and 6 would be no policy and for design control decisions to be made in accordance with the Chilterns Design Guide and general district level design criteria. The Parish Council has prepared new design guidance that is specific to the settlements defined in the policy (in the Appendix to the neighbourhood plan) to refine existing guidance to better reflect the particular characteristics of the parish. These policies ought therefore to lead to a better design outcome.
- 7.31. Policy 7 is intended to promote more sustainable approaches to building design and construction and to promote the re-use of redundant ancillary buildings as suitable accommodation for home working, hobby or temporary guest accommodation. The Policy will deliver additional benefits to those outlined in Policies 4 to 6 principally in relation to the employment benefits, and the potential reduction in the need to travel (SA6) and in limiting the visual impact of development (SA4). The 'no policy' alternative would be neutral in effect but would miss the opportunity to secure the policy benefits.
- 7.32. Policy 8 supports the rural economy through the re-use of redundant buildings to support rural enterprise and the re-use of buildings to serve the essential needs of agriculture and forestry. The policy adds more value to existing policy framework by making specific policy provisions to

support rural diversification and the provision of housing to meet the specific needs outlined and hence has positive effects on SA/SEA objectives 1 and 6.

- 7.33. Policy 9 is intended to support new employment uses and flexible business start-up accommodation that does not lead to the loss or conversion of existing community facilities. As such it aligns well with SA2 and SA6. The only other reasonable policy alternative was to have no policy which could have negative effects on SA2 due to acknowledged pressures on community facilities and their conversion to other uses.
- 7.34. Policy 10 seeks to protect designated and non-designated environmental assets in the parish from development and to promote their enhancement. Given the specific nature of the policy the only reasonable alternative was not to have such a policy and the uncertain effects that would result. The policy responds positively to SA/SEA 3 and 4.
- 7.35. Policies 11 and 12 acknowledge the need to protect critical community facilities which are essential to the vitality of the parish and to support proposals intended to ensure the communities needs may be met over the longer term. Both policies respond positively to SA2 and 6 and the only reasonable alternative to the proposal to enable the expansion of the school was having no policy, as there are no other practical means of achieving this objective. Again, the 'no policy' alternative was neutral, but would miss the opportunity to secure a longer-term community benefit.
- 7.36. Policy 13 responds to the market failure to provide good broadband connectivity in the parish, is the primary infrastructure concern of the local community and is considered essential to support a thriving rural economy. As such it responds positively to SA6 and is also likely to deliver benefits to other objectives although these are less certain. The 'no policy' alternative would not address this market failure and would likely lead to even greater negative effects on the local economy.
- 7.37. Finally, Policy 14 supports proposals for smaller scale renewable energy installations in appropriate and non-sensitive locations. While small scale domestic renewable energy installations are generally classed as permitted development, the policy also includes modest farm scale facilities of a type that do not detract from the landscape setting of the parish. There is therefore a strong alignment with SA/SEA objective 4 and 6 but no reasonable policy alternative other than that provided by national and local planning policy.

Summary of Assessment

- 7.38. In summary, none of the reasonable policy alternatives would lead to a better policy outcome than the proposed policies when assessed against the SA/SEA framework. In overall terms, therefore, the sustainability effects of the Neighbourhood Plan are generally assessed as positive or, at worst, neutral. The proposed mitigation measures of the policies, where necessary, will effectively avoid any negative impacts. Further, other than the proposals at Molins, South Saunderton, the policies of the Plan are such that there will likely be no cumulative effects on the area beyond the parish boundary.

8. A description of measures envisaged concerning monitoring

- 8.1. The Parish Council will monitor the progress in the implementation of the Neighbourhood Plan using the measures identified in Table A. The data for some of these measures is collected by the District Council in its planning monitoring reports. In other cases, the BcS PC will endeavour to collect data on an annual basis to report on the progress of the plan. It is possible that the BcS PC will choose to review the Neighbourhood Plan on a five yearly cycle and it will be informed by this monitoring activity in considering if and how to update the policies.