

Milton Keynes Council
Milton Keynes Core Strategy
Sustainability Appraisal / Strategic Environmental Assessment Adoption
Statement (July 2013)

1. Introduction

1.1 Milton Keynes Council adopted the Milton Keynes Core Strategy on Wednesday 10th July 2013. This Adoption Statement has been prepared in accordance with Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations 2004, which requires that on adoption of a plan or programme, a statement which sets out the following is published:

- How the environmental considerations have been integrated into the plan or programme;
- How the Environmental Report has been taken into account;
- How opinions expressed during consultation have been taken into account;
- The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and
- The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.

1.2 In keeping with S.19 (5) of the Planning and Compulsory Purchase Act 2004 (as amended by the Planning Act 2008) the 'significant effects' of implementing the plan have been included in a Sustainability Appraisal (SA) report, which incorporates social and economic effects alongside the environmental effects required by SEA. The SA process also incorporates the requirements of Strategic Environmental Assessment (SEA) in accordance with European Union Directive 2001/42/EC and removes the need to carry out a separate SEA.

1.3 As a result, a combined SA / SEA of the Core Strategy has been undertaken which satisfies the relevant regulations and legislation. Where the Council is required by the Environmental Assessment of Plans and

Programmes Regulations 2004 to produce a statement on 'environmental effects', it has expanded on this in relation to each of the 'particulars' listed above to include economic and social considerations / effects as well.

2. Background

2.1 The Core Strategy sets out a vision, strategic objectives, spatial strategy and supporting policies to guide development across Milton Keynes Borough up to 2026. The document includes targets for job and home growth as well as allocating a new Strategic Land Allocation for in the region of 2,900 homes and supporting facilities as well as a significant amount of new employment floorspace.

2.2 The Council's Core Strategy and SA Report were submitted to the Secretary of State for Communities and Local Government in March 2011.

2.3 SA has been undertaken as an iterative process alongside the development of the Core Strategy. Prior to submission of the Core Strategy, consultation provided the public and statutory bodies with an opportunity to comment on the Core Strategy and associated SA during both the Preferred Options (September 2007) and Pre Submission Consultation (February 2010). Further consultation was also undertaken on a Revised Pre-Submission document, which was also subject to SA (October 2010) with an additional SA Report subsequently prepared to accompany an Assessment of Reasonable Alternatives to the proposed Strategic Land Allocation (January 2011).

2.4 Mary Travers, MRTPI was appointed as the Inspector to conduct an independent examination into the soundness of the submission version of the Core Strategy (March 2011) and its supporting documents. Before progressing to the hearing sessions of the Examination, the Inspector raised some concerns regarding the process for selecting the location of the Strategic Land Allocation. Therefore, additional site assessments were undertaken, alongside further SA work, which was subject to consultation in June/July 2011.

2.5 Following the hearing sessions of the Core Strategy public examination, the Council proposed a number of 'main modifications'. A further SA Report was published alongside consultation on the proposed main modifications in January 2013.

2.6 The Council received the Inspectors Report in May 2013 which stated that although further minor updates were required as a result of comments made on the main modifications, no further SA was required.

3. How environmental considerations have been integrated into the Core Strategy

3.1 The SA has been carried as an iterative process alongside a number of key stages in the preparation of the Core Strategy (see section 2.3-2.5 above). The SA sought to test each emerging policy decision and alternative strategy of the emerging Core Strategy against the agreed sustainability framework.

3.2 The SA is undertaken in parallel with development of the plan, so that all reasonable alternatives for achieving the plan's objectives are assessed for their sustainability effects, and to ensure that the wording of policies as far as possible seeks to minimise any negative sustainability impacts and maximise any opportunities to deliver the sustainability objectives. Stakeholders including statutory consultees were given opportunities to comment at each stage of plan production. Any views expressed were used to guide and inform the appraisal and plan preparation process. The development of the Core Strategy and the accompanying SA has therefore been an iterative and inclusive process.

3.3 The SA framework was used to develop emerging policies and help identify the most appropriate policies and strategic sites to be included in the final version of the plan. In particular, the additional SA work that was undertaken alongside the site assessments for reasonable alternatives to the

Strategic Land Allocation has been integral to ensuring the land allocation is both in the most sustainable location and that the supporting policies for the site will shape development in a sustainable manner.

4. How the Environmental Report has been taken into account

4.1 The SA process, as set out in the 'Environmental Report', which is made up of a suite of documents, has contributed to the development and refinement of the Core Strategy by providing a separate assessment of the sustainability of the Council's proposed options and policies throughout the plan preparation process. Each SA Report demonstrates how the sustainability of proposed alternative options has been considered in a consistent manner. The relevant SA Report has been available whenever Full Council, or the Council's Cabinet, has taken a decision on the future of the Core Strategy.

4.2 This process has supported:

- The selection of the most appropriate options at each stage in an open and transparent way;
- The revision of options where necessary, to ensure that consideration is given to the most realistic alternatives; and
- The establishment of mitigation measures to address certain potentially negative effects and achieve the most sustainable outcome.

5. How consultation responses have been taken into account

5.1 The minimum requirements for consultation and public participation are set out in the relevant Regulations. For the majority of the Core Strategy preparation process, these were the Town and Country Planning (Local Development) (England) Regulations 2004, (as amended). Local Planning Authorities are required to produce a Statement of Community Involvement

(SCI) in order to set out how and when the community and other interested parties can take part in, and influence, the plan-making process.

5.2 Milton Keynes Council is also required (under the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended) to submit a statement setting out, if representations were made in accordance with the regulations, the number of representations made and a summary of the main issues raised in those representations.

5.3 In summary, the Council has satisfied the regulations in terms of consultation on its Core Strategy and associated Sustainability Appraisals.

5.4. Responses have helped to ensure that the full range of alternative options have been considered through the development of the Core Strategy and the accompanying SA process. The consultation responses have in particular helped to shape the detail of the policies to ensure the most sustainable outcomes.

5.5 By engaging in the process of considering alternatives to the Strategic Land Allocation, respondents to the consultation have helped to ensure that amendments to the original proposals have been made that should lead to a significantly more sustainable outcome.

6. Reasons for choosing the final version of the Core Strategy (in light of other reasonable alternatives)

6.1 The Environmental Assessment of Plans and Programmes Regulations 2004 (12) (2) requires environmental reports (SA / SEA) to consider any reasonable alternatives, taking into account the objectives and the geographical scope of the plan or programme.

6.2 As set out previously, the SA and plan making process for the Core Strategy have run effectively in parallel through all stages of the Core

Strategy, with the relevant SA report being available when the Council has taken any decisions regarding the future of the Strategy. As well as helping to shape policies to ensure they are sustainable, the SA work has been key to justifying major decisions that underpin the Core Strategy.

6.3 During 2010, the Council took the decision to review the housing target in the Core Strategy on the grounds that the target in the original Pre-Submission Core Strategy (February 2010) was undeliverable. A new, realistic and deliverable target was developed. The change in the overall housing figure between the February 2010 Core Strategy and the October 2010 version, was appraised in the SA Addendum October 2010 (Submission Document B107). The Addendum identified positive sustainability effects, mainly environmental, of reducing the housing target, but also negative effects, as a result of limits on the delivery of new homes and general support for economic growth. Ultimately, the decision to follow a lower housing target was based on ensuring the housing target was realistic and deliverable, providing certainty for communities as to where Milton Keynes would grow.

6.4 The selection of a site for the Strategic Land Allocation was subject of several rounds of consultation and SA. After amending the allocation alongside the housing target in the October 2010 version of the Core Strategy, the Council undertook additional SA work as it was felt that alternative options had not been considered formally through the appraisal process. This led to the production of the Sustainability Appraisal of Reasonable Alternative Sites (SARAS) (Submission Document B110) which was published in January 2011.

6.5 The Council submitted the revised Core Strategy on 1 March 2011 for public examination. Following submission, at the Inspector's request the Council re-considered the adequacy of the sustainability appraisal process that had been undertaken. As a result, public consultation on the SARAS, together with consultation on the Housing and Employment Technical Papers took place in June-July 2011. Meanwhile the start of the hearings was deferred.

6.6 Having considered the consultation responses, the Council proposed to amend the original allocation of the SRAs by including an additional parcel of land. This approach was chosen as it would enable a more joined up approach to development in the area to be delivered, which would have benefits particularly in terms of transport and the provision of (and ease of access to) key facilities, such as schools. The revised proposal, known as the Strategic Land Allocation (SLA) was then subject to public consultation between September and November 2011. The overall housing provision target for the plan period and the housing target for the urban extension remained unchanged. This process has led to the October 2010 submission version of the Core Strategy, as revised in September 2011 by the SLA, forming the basis for the examination.

6.7 Following the closure of the hearings for the public examination of the Core Strategy the Council requested that the Inspector should make any modifications needed to rectify matters that make the Plan unsound/not legally compliant and thus incapable of being adopted.

6.8 Following consideration and approval by Full Council on 9 January 2013, at the Inspector's request, a schedule of proposed main modifications that are necessary to make the Core Strategy sound and legally compliant was published for public consultation for six weeks on 15 January 2013. The schedule was subject to sustainability appraisal, where necessary. The schedule, amongst other things, included an amendment to the Strategic Land Allocation boundary. The change to the SLA boundary was appraised, with the outcome being positive, particularly ensuring improved links with the existing urban area. The main concern was that the additional land would increase the potential for coalescence of the new development with the village of Wavendon. The SA highlighted that a long term defensible green buffer would help to mitigate the potential for coalescence. Given that this change was seen as necessary by the Inspector to make the Core Strategy sound, and that the SA showed no over-riding sustainability concerns that could not

be mitigated, this change was taken forward to the adopted version of the Core Strategy.

6.9 Subsequently, following public consultation on the implications of the revocation of the South East Plan the Inspector made some amendments to the detailed wording of the main modifications and added consequential modifications where these were necessary for consistency or clarity. The Inspector, in her report, clarified that none of these amendments significantly alters the content of the modifications as published for consultation or undermines the participatory processes and sustainability appraisal that was undertaken in January 2013.

6.10 Each SA Report demonstrates how sustainability objectives have been taken into account at each stage, and integrated into the development of the Core Strategy. Each stage of consultation and associated SA can be accessed from the Milton Keynes Council web site at:

<http://www.milton-keynes.gov.uk/planning-policy/displayarticle.asp?ID=61305>

and

[http://www.milton-keynes.gov.uk/planning-policy/documents/MKC43 Sustainability Appraisal of Main Modifications Jan 2013.pdf](http://www.milton-keynes.gov.uk/planning-policy/documents/MKC43_Sustainability_Appraisal_of_Main_Modifications_Jan_2013.pdf)

7. Measures to monitor the significant environmental effects of the Core Strategy

7.1 The Core Strategy contains a Monitoring and Managing Framework which indicates the monitoring that will be undertaken to measure the effectiveness of the Core Strategy in achieving the Spatial Vision and meeting its objectives. The monitoring will indicate whether any changes to the Core Strategy need to be considered if a policy is not working or if the targets are not being met. In addition, the Council will use indicators from the Sustainability Appraisal to monitor the potential significant effects of the policies and proposals, as identified through the SA Report.

7.2 The effectiveness of policies will be assessed, where possible, against measurable targets. These are included in the Core Strategy Monitoring and Managing chapter. Some policies (such as Policy CS13 'Ensuring High Quality, Well Designed Places') aim to deliver a qualitative rather than quantitative outcome. In such instances, a measurable target may not be appropriate.

7.3 Monitoring outcomes will normally be reported on an annual basis for a year beginning 1 April and ending 31 March through the Council's Annual Monitoring Report (AMR). The AMR will identify any objectives and targets that are not being met and any action to rectify the situation. The AMR will also be a key source of evidence when we prepare Local Plans. The Report will be published on the Council's website.