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**Draft Non-technical Summary of the
Sustainability Appraisal of the Proposed
Submission Version of Plan:MK**

DOCUMENT DETAILS					
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Limitations

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1 **Introduction**

AECOM is commissioned to lead on Sustainability Appraisal (SA) in support of the emerging Plan:MK. Once adopted, the plan will allocate land for development and set policies to guide decisions on development and changes to how land is used.

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

The Local Plan is at an advanced stage of preparation, with the 'proposed submission' version soon to be published for consultation, under Regulation 19 of the Local Planning Regulations. An SA Report will be published alongside the Proposed Submission VALP, in accordance with the Regulations.

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

2 **Structure of the SA Report / this NTS**

SA reporting essentially involves answering the following questions in turn:

What has plan-making / SA involved up to this point?

i.e. preceding finalisation of proposals for consultation.

What are the appraisal findings at this current stage?

i.e. in relation to the proposals published for consultation.

What are the next steps?

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

3 **What's the scope of the SA?**

The scope of the SA is reflected in a list of sustainability objectives. Taken together, this list indicates the parameters of SA, and provides a methodological 'framework' for appraisal.

Table 1: Sustainability issues and objectives (the SA framework)

Sustainability objective	
Communities	
1.	Reduce levels of crime and create vibrant communities .
2.	Reduce the gap between the most deprived areas of Milton Keynes and the average.
3.	Improve education attainment and qualification levels so that everyone can find and stay in work.
4.	Protect and improve residents' health and reduce health inequalities.
5.	Ensure that everyone has the opportunity to live in an affordable, sustainably constructed home .
6.	Ensure all section of the community have good access to services and facilities .
Environment	
7.	Maintain and improve the air quality in the borough.
8.	Conserve and enhance the borough's biodiversity .
9.	Combat climate change by reducing levels of carbon dioxide.
10.	Conserve and enhance the borough's heritage and cultural assets.
11.	Encourage efficient use of natural resources (inc. land/soils).
12.	Limit noise pollution .
13.	Limit and reduce road congestion and encourage sustainable transportation .
14.	Maintain and improve water quality and minimise the risk of flooding.
15.	Reduce waste generation and encourage sustainable waste management.
Economy	
16.	Encourage the creation of new businesses .
17.	Sustain economic growth and enhance competitiveness.
18.	Ensure high and stable levels of employment .

4 **PLAN-MAKING / SA UP TO THIS POINT**

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

As such, Part 1 of the SA Report explains how work was undertaken to develop and appraise a 'reasonable' range of alternative approaches to site allocation, or **reasonable spatial strategy alternatives**, ahead of finalising the draft proposals for consultation.

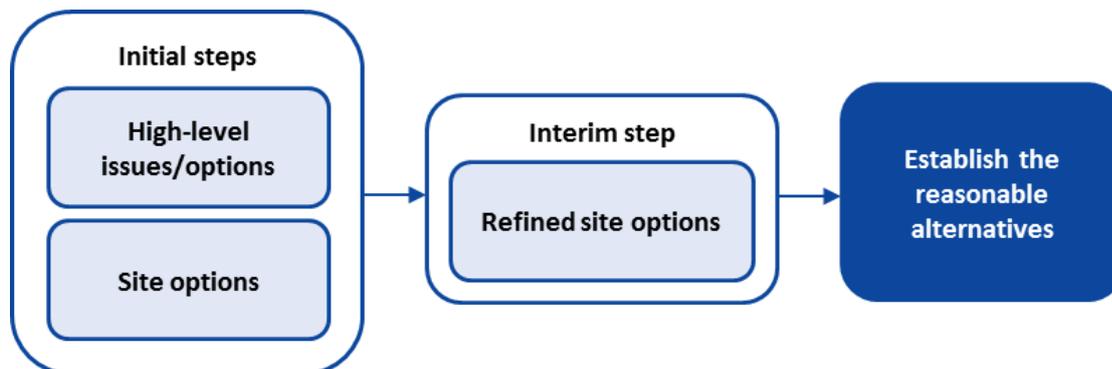
Specifically, Part 1 of the report -

- 1) explains the process of **establishing** the reasonable spatial strategy alternatives;
- 2) presents the outcomes of **appraising** the reasonable spatial strategy alternatives; and
- 3) explains reasons for **establishing** the preferred spatial strategy option, in light of the appraisal.

5 **Establishing reasonable alternatives**

The main report explains how reasonable alternatives were established subsequent to a lengthy process of gathering evidence and examining options. The process can be summarised in a flow diagram (see below).

Figure 1: The process of establishing the reasonable alternatives (summary)



There is no need to dwell here on the **'initial' step of examining high-level issues/options**. In summary, this step involved examining:

Objectively assessed housing needs (OAHN) and arguments for providing for a higher or lower number of homes through Plan:MK.

MK city-specific growth opportunities, including as established by the MK Futures 2050 Commission Report (2016).

MK city-specific growth issues, particularly in relation to the need to ensure a diverse mix of housing sites, including smaller sites, in order to ensure deliverability / a robust housing delivery 'trajectory'.

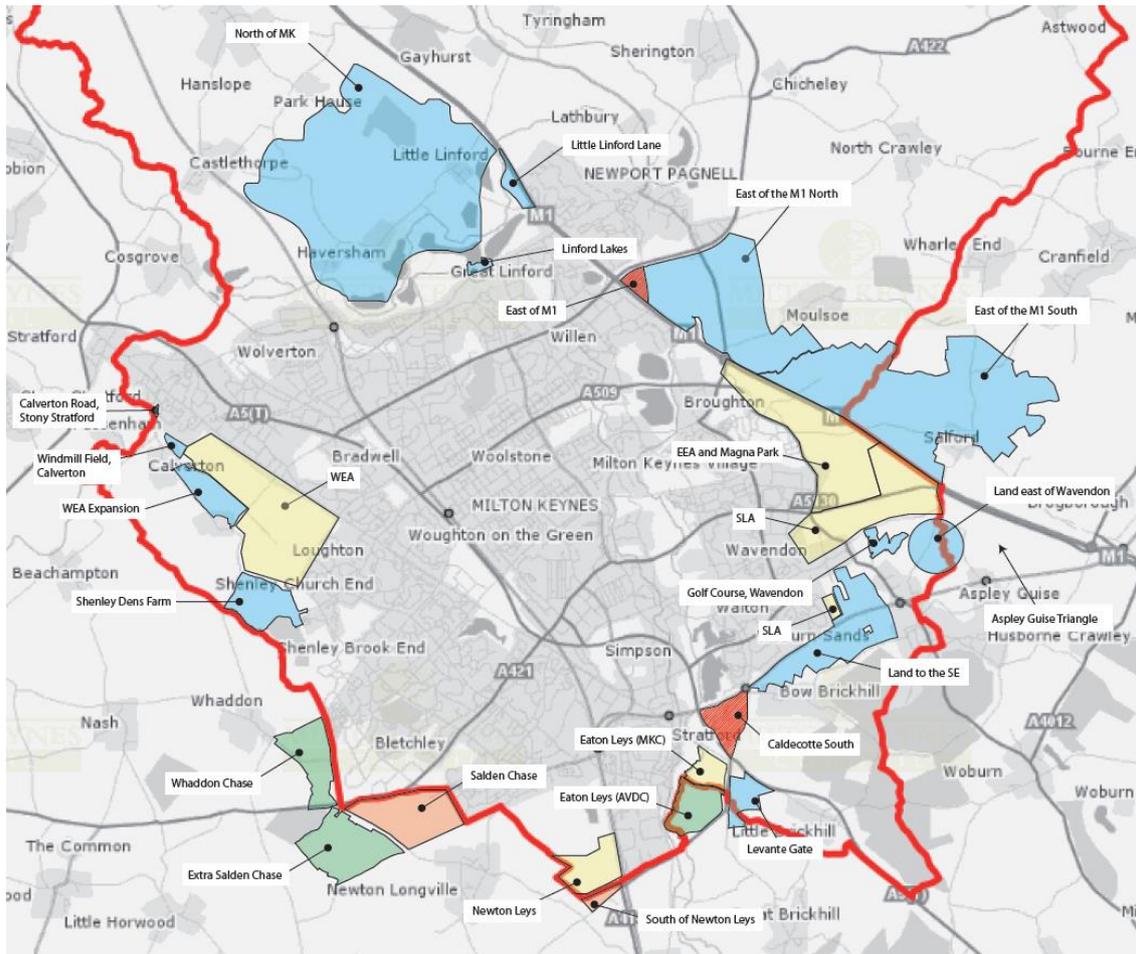
Growth opportunities elsewhere, with the conclusion reached that there is little or no argument for Plan:MK allocations away from the MK urban area.

Opportunities for a Garden Village, with the conclusion reached that there is no opportunity to be explored through Plan:MK, recognising that no Garden Villages are being actively promoted.

As for the **'initial' step of examining site options**, this primarily involved: A) identifying a longlist of site options around the MK edge; and then B) undertaking an initial sift, or 'screen', in order to arrive

at a shortlist. The longlist (A) is presented within Figure 1, whilst the screening process (B) is reported in Table 2.

Figure 2: The longlist of MK urban edge site options



KEY

Plan:MK Site Options

- Housing
- Employment

Existing Commitments - Strategic Sites



MK Extensions within Aylesbury Vale



Urban Extensions in Aylesbury Vale Local Plan



N.B. for context, the figure also shows:

- Employment site options;
- Major commitments
- Major commitments within Aylesbury Vale District; and
- Major site options within Aylesbury Vale District that are discussed as options within the Vale as Aylesbury Local Plan SA Report (2017), albeit none are supported by Aylesbury Vale District Council for allocation.

Figure 2: Screening the longlist of MK urban edge housing site options

Ref	Name	Screening outcome	Commentary
1	Calverton Road, Stony Stratford	Out	<ul style="list-style-type: none"> All judged to perform relatively poorly due to a range of site specific considerations, and also for the reason that all are small sites (<350 homes), contrary to the objective of supporting 'substantial' schemes that will deliver strategic infrastructure. Not supported by the Newport Pagnell Neighbourhood Plan. Sequentially less preferable than the other medium scale site options discussed below, as it would only link to the urban area upon completion of the permitted Eaton Leys site, and even at that point would not relate well.
2	Windmill Field, Calverton		
3	Linford Lakes		
4	Little Linford Lane		
5	South of Newport Pagnell		
6	Levante Gate		
7	Wavendon Golf Course	In	<ul style="list-style-type: none"> Medium to large scale urban extension sites associated with notable issues, but worthy of more detailed examination.
8	WEA Expansion		
9	Shenley Dens Farm		
10	Wavendon/Woburn ('eastern') broad area		
11	South East MK		
12	East of the M1 (north)		
13	East of the M1 (south)		
14	North of MK		

As for the 'interim' step of examining a refined list of site options (i.e. the shortlist of screened-in site options), this involved subjecting the eight site options (sites 7 to 14) to an informal examination, under the SA topic headings (see Table 1, above). Conclusions are presented in Table 3. N.B. it is worth reiterating that this analysis was undertaken as an 'interim' step in the overall process, specifically with the aim of informing the development of reasonable spatial strategy alternatives (see discussion below).

Table 3: Informal appraisal of the refined list (shortlist) of site options

Ref	Name	Conclusions following examination
7	Wavendon Golf Course	<p>Further expansion to the east, within the area of land bounded by the M1, A421 and the railway line, extending into Central Bedfordshire District, makes strategic sense in certain (socio-economic) respects, recognising transport infrastructure and the need to realise opportunities within the Oxford to Cambridge Corridor. However, this site is sequentially less preferable to the SE MK site discussed below. It is subject to a degree of constraint, with 'medium' landscape sensitivity (including due to evidence of a former parkland)¹ and three clusters of listed buildings (ten in total) adjoining the site. It would need to come forward subsequent to completion of the Strategic Land Allocation, which inherently leads to a degree of uncertainty in respect of delivery timescale. It is a smaller site that might be of insufficient scale to deliver new community infrastructure (e.g. primary school), therefore growth could serve to 'load pressure' onto new infrastructure being delivered in the area. There is an understanding that extensive committed growth in the east of MK - within the Eastern Expansion Area and the Strategic Growth Location - should be given the opportunity to 'bed in'.</p>
8	WEA Expansion	<p>Would extend the WEA beyond the extent deemed to be suitable in 2005, at the time of allocation. The Calverton Road would form a new boundary; however, along this road is the string of three 'Weald Villages'. The site's 'red line boundary' indicates the potential for coalescence; however, the developer proposals suggest that this can be avoided (at least in respect of Upper Weald and Middle Weald) through greenspace buffers. The proposal is that extensive greenspace provision could be the first phase of a wider 'Calverton Valley Park' - an extension to the Ouse Valley strategic green infrastructure corridor, extending between Calverton and Whaddon. The proposal is to deliver sport and recreation facilities, but otherwise rely on community infrastructure within the WEA. The site is in two parts, with intervening land outside the control of the developer.</p>

¹ Landscape Sensitivity Study to Residential Development in the Borough of Milton Keynes and Adjoining Areas (Gillespies, 2016)

Ref	Name	Conclusions following examination
9	Shenley Dens Farm	<p>Unlike the two sites discussed above, this site would adjoin the existing urban edge, and indeed could link directly to an existing grid road. A large scheme is proposed that would deliver a primary school and a mixed use local centre. It is also noted that there is a good range of existing local facilities within walking/cycling distance, and central MK is closer to this area than it is to the eastern edge of MK. However, a scheme of this scale would lead to significant impacts to a landscape defined as having ‘high’ sensitivity.¹ In 2005 the Local Plan Inspector concluded, in respect of a virtually identical site: “[I]t would be visible from large parts of the Whaddon Valley. The Shenley Ridge is a significant feature in the landscape and I agree with the Llewelyn-Davies assessment that it is a feature that would form a logical and obvious boundary to development... I do not see the logic of regarding the Whaddon Valley as a possible long-term development area. To do so disregards the qualities of the valley landscape and the merits of the Shenley Ridge as a logical and clear long-term boundary.” The site also contains a listed farmhouse at its centre, and partially wraps around Oakhill Wood, a large ancient woodland (mostly replanted) that falls within the Whaddon Chase Biodiversity Opportunity Area (BOA).²</p>
10	Wavendon/ Woburn ('eastern') broad area	<p>Further expansion to the east makes considerable strategic sense in certain (socio-economic) respects (see discussion above, under Site 7), and there would be merit to planning strategically for this area (e.g. designing in grid road extensions and strategic green buffers) rather than risking piecemeal development (a site for 200 homes is currently at appeal). However, this site is not currently being actively promoted in its entirety, and the Central Bedfordshire Local Plan is seemingly not supportive of cross boundary expansion in this location (a ‘series of linked villages’ within the Apsley Guise Triangle is proposed by the Central Bedfordshire Local Plan, 2017). It would need to come forward subsequent to completion of both the Strategic Land Allocation and Wavendon Golf Course, which inherently leads to a degree of uncertainty in respect of delivery timescale. Furthermore, the implication is that allocation would lead to a very large quantum of housing growth to the east of MK, over a c.20 year period. There is an understanding that current growth areas - the Eastern Expansion Area and the Strategic Growth Location - should be given the opportunity to ‘bed in’. The landscape here is also deemed more sensitive (‘medium’) than the landscape associated with Site 10 (‘low’).¹</p>

² BOAs are extensive areas that include a concentration of important habitat, and within which there will likely be a good degree of ecological connectivity over a relatively large scale. There is a need to maintain and increase ecological connectivity within BOAs, which can potentially be achieved through development, where this leads to targeted habitat creation, restoration or enhancement.

Ref	Name	Conclusions following examination
11	South East MK	<p>Would mostly link to the existing urban edge, albeit much of the site would not link directly to the grid road network. Would extend MK close to the edge of Woburn Sands and Bow Brickhill; however, the landscape has 'low' sensitivity (albeit landscape assessment work suggests the need for 'small scale development')¹ and new communities would benefit from good access to the train stations at these two villages. The site extends across the railway line, which will result in the need for one or more new bridges. There is the potential for the preferred route of the Oxford to Cambridge Expressway (a major trunk road) to pass through this site; however, the risk is relatively low. Were the Expressway to pass through the site, then it would have considerable implications for masterplanning and phasing.</p>
12	East of the M1 (north)	<p>Potential to deliver a comprehensive new community, to include a secondary school and extensive employment land well located on the strategic road network. However, there are also potential drawbacks to this scheme from a communities perspective, recognising that the new community would be relatively poorly linked to CMK, with the M1 acting as a barrier. The site benefits from being well located to a motorway junction, with two existing road bridges and a footbridge; however, there would nonetheless be a need for extensive and costly infrastructure upgrades. The site is significantly constrained by flood risk associated with the river Ouzel, which would have implications for masterplanning.</p>
13	East of the M1 (south)	<p>On balance, sequentially less preferable the E of the M1 (north) site (discussed above). On one hand it would benefit from being located on the edge of the Oxford to Cambridge Corridor; however, on the other hand: the site relates poorly to Newport Pagnell; is associated with a stretch of the M1 where there is no existing junction and few bridges; and would also place pressure on the Eastern Expansion Area / Strategic Land Allocation. There is some (more limited) flood risk.</p>
14	North of MK	<p>Sequentially less preferable the E of the M1 (north) site (discussed above), for a number of reasons. Notably, there would be a need to bridge the extensive flood plain of the River Great Ouse / Linford Lakes; and growth to the north of MK would not relate well to the existing transport network (there is no M1 junction in the vicinity) or the Oxford to Cambridge corridor / Expressway proposals. There are also a greater degree of onsite landscape, heritage and biodiversity constraint to contend with, relative to sites 12 and 13.</p>

In light of the ‘initial’ steps and the ‘interim’ step discussed above, the Council, working in collaboration with AECOM, was in a position to **establish the reasonable alternatives**.

The objective was to establish a reasonable range of alternative combinations (or ‘packages’) of site options, where each package would provide for the required number of homes. It was recognised that there was a need to provide for at least the OAHN figure assigned by the MK Strategic Housing Market Assessment (SHMA, 2017), but that there was also a need to consider higher growth options. There are a number of arguments for allocating land sufficient to deliver above the assigned OAHN figure, including on the basis of wishing to provide for a ‘buffer’ as a ‘contingency’ for some allocated sites not delivering in the plan period (or delivering fewer homes than anticipated), and wishing to demonstrate that growth related opportunities are fully examined.

It was determined that there should be three spatial variables, with two or three options reflected for each variable – see Table 4. This then led to the reasonable alternatives presented in Table 5.

Table 4: Variables/options for the purposes of establishing spatial strategy alternatives

Variable	Options	Notes
MK urban area	2,900 homes	The lower growth option would involve sites deemed ‘suitable’ through the HELAA and also deemed ‘developable’ on the basis that the site either: A) has existing policy support; B) would involve an acceptable change of use to residential (this rule applies to two unimplemented employment site allocations); or C) would support improvements to community facilities (s rule applies to one site, namely Milton Keynes Rugby Club, Greenleys).
	3,600 homes	The higher growth option would involve all of the sites judged ‘suitable’, regardless of the conclusion reached on developability, with the exception of two sites in CMK (namely Station Square, which is a complex site, and site ‘E1.1’, which would be contrary to the CMK Neighbourhood Plan).
SE MK	1,500 homes (in the plan period)	The capacity of the site is 3,000 homes; however, there is a risk of the Oxford to Cambridge Expressway passing through the site, which would lead to a delay in housing delivery (for that part of the site south of the railway line) and potentially reduce the capacity of the site. The risk is now considered to be relatively low; however, some risk remains, and so it is pragmatic to test the option of the site not delivering in full within the plan period (which was the preferred option at the Draft Plan MK stage).
	3,000 homes	
East of M1	Nil homes	The capacity of the site is perhaps 5,000 homes; however, a maximum of 3,000 might be delivered in the plan period. Even delivery of 3,000 homes is highly uncertain, given the need for significant infrastructure upgrades. Government funding may become available to fund infrastructure upgrades; however, there is no certainty in this respect. Were the site to deliver in the plan period, it would also deliver employment land ; thereby negating the need for any other employment land allocation. Specifically, it would negate the need to allocate South of Caldecotte (see Figure 6.8).
	1,500 homes (in the plan period)	
	3,000 homes (in the plan period)	

Table 5: The reasonable spatial strategy alternatives

Supply	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7	Option 8
Completions/ commitments	21,850							
Windfall	1,330							
Urban area allocations	Low	High	Low	Low	High	High	Low	Low
SE MK allocation	Low	Low	Low	High	Low	High	Low	High
East of M1 allocation			Low		Low		High	Low
Total supply	27,580	27,580	27,580	27,580	27,580	27,580	27,580	27,580
Target buffer	4%	7%	10%	10%	12%	12%	15%	15%
Employment land allocation	S. Caldecott e	S. Caldecott e	E of M1	S. Caldecott e	E of M1	S. Caldecott e	E of M1	E of M1

6 Appraising reasonable alternatives

Summary alternatives appraisal findings are presented within the table below. Within each row (i.e. for each of the topics that comprise the SA framework) the columns to the right hand side seek to both categorise the performance of each option in terms of ‘significant effects’ (using **red** / **green**) and also rank the alternatives in relative order of performance.

Table 5: Summary alternatives appraisal findings

Topic	Rank of performance / categorisation of effects							
	Opt 1	Opt 2	Opt 3	Opt 4	Opt 5	Opt 6	Opt 7	Opt 8
Communities	2	3	2	2	3	3	★1	3
Education	2	3	2	2	3	3	★1	3
Health	2	3	2	2	3	3	★1	3
Homes	7	6	4	5	2	3	★1	★1
Services	2	3	2	2	3	3	★1	2
Air quality	★1	★1	2	★1	2	★1	2	2
Biodiversity	=	=	=	=	=	=	=	=
Climate change	=	=	=	=	=	=	=	=
Heritage	=	=	=	=	=	=	=	=
Landscapes	=	=	=	=	=	=	=	=
Nat resources	=	=	=	=	=	=	=	=
Noise	★1	★1	2	★1	2	★1	2	2
Transport	★1	★1	2	★1	2	★1	2	2
Water	★1	★1	2	★1	2	★1	2	2
Business/ Economy/ Employment	2	2	★1	2	★1	2	★1	★1

Topic	Rank of performance / categorisation of effects							
	Opt 1	Opt 2	Opt 3	Opt 4	Opt 5	Opt 6	Opt 7	Opt 8
Conclusion								
<p>The first point to note is that ‘significant positive’ effects are predicted for all alternatives in respect of ‘Housing’ and ‘Business/Economy/Employment’. This is because targets established by the Strategic Housing Market Assessment (SHMA) and Employment Land Needs Assessment (ELNA) would be met under all options. Conversely, all alternatives would result in ‘significant negative’ effects in respect of ‘Natural resources’. This is because all alternatives would involve growth at the South East MK site, which mostly comprises ‘best and most versatile’ agricultural land.</p> <p>Focusing on the relative merits of the alternatives, the first point to note is that Option 7 performs well in terms of a range of socio-economic objectives. This is because it would involve a high growth strategy, with a focus of growth to the east of the M1, where the assumption is that there would be the potential to deliver a ‘sustainable’ new community, e.g. a community with a secondary school, services/facilities and employment delivered alongside housing. Options involving growth to the east of the M1 (Options 3, 5, 6 and 7) are also judged to perform well in terms of ‘Business/Economy/Employment’ objectives, recognising the potential to deliver significant new employment land (and in particular warehousing, for which there is a need locally). However, Options involving growth to the east of the M1 perform poorly in other respects, namely in terms of ‘Transportation/Air quality’ (the two issues being linked), ‘Noise’ and ‘Flood risk’. The former issues with the site relate to the fact that the M1 would inevitably act as a barrier to movement, and be a source of pollution, whilst the latter issue relates to flood risk associated with the river Ouzel, which passes through the site.</p> <p>Aside from the matter of growth to the east of the M1, the other variables across the reasonable alternatives are: growth at South East MK (all within the plan period, or phased growth); allocation of urban open space sites (a restrained approach, or a more permissive approach) and the matter of the South of Caldecotte employment site (allocation assumed only under options not involving growth east of the M1). The appraisal highlights a number of issues/impacts, in respect of these variables/options; however, these tend to be secondary to those associated with growth to the East of the M1. Notable issues/impacts include –</p> <p>South East MK – this site is relatively unconstrained, although there is an argument to suggest that growth should be phased, such that some delivery is post 2031, recognising the quantum of committed growth to the east of MK. This issue/impact is uncertain, and hence does not have a bearing on the ranking of alternatives presented above.</p> <p>Urban area – it is recognised that loss of urban open space would impact on the amenity of residents. This issue/impact has a bearing on the ranking of the alternatives (i.e. Options 2, 5 and 6 perform poorly in terms of several objectives); however, there is a need for further work to establish impact significance.</p> <p>South of Caldecotte employment allocation – this site is relatively unconstrained, although it is noted that it falls within a broader area identified as having ‘medium’ landscape sensitivity (in comparison, South East MK has ‘low sensitivity’).</p> <p>Finally, there is a need to highlight the higher growth options as performing well from a ‘Housing’ perspective. An overriding consideration relates to the extent of the contingency / buffer, over-and-above the 26,500 objectively assessed housing need (OAHN) figure, that is put in place, recognising: A) the need to ensure that OAHN is provided for in practice; and B) the objective of providing for ‘above OAHN’ in order to more fully meet affordable housing needs. This consideration dictates the order of preference assigned to the alternatives. However, another important objective relates to providing for a good mix of housing sites, with a view to ensuring a robust ‘trajectory’ of housing delivery over the plan period.</p> <p>In conclusion, it is clear that all of the spatial strategy alternatives are associated with ‘pros and cons’. The Council must consider how best to ‘trade-off’ between competing objectives.</p>								

7 Establishing the preferred option

The Council's preferred approach is Option 4, which the appraisal finds to have 'pros and cons', as per all other options. The following text, which is provided by the Council explains the reasons for supporting Option 4 -

Option 4 enables planned housing growth to make use of existing infrastructure - and also capitalise on infrastructure improvements that will come on-stream - during the plan period. It would also provide a level and mix of housing that will fully meet the OAHN plus a suitable buffer, meet the affordable housing need in full (or at least the vast majority of it) and support timely delivery of housing over the plan period via a range of site sizes and type. In combination with the allocation of South Caldecotte as a strategic employment site, Option 4 is considered to be the most appropriate and deliverable strategy for meeting the objectively assessed needs of the borough.

Whilst options involving growth to the east of the M1 have considerable social and economic benefits, uncertainty still exists over the deliverability of growth in this location linked to the availability of necessary infrastructure funding. Funding to enable growth in this area is being pursued by the Council, and therefore Plan:MK supports growth east of the M1 (giving it reserve site status) with its delivery within the plan period only being acceptable should funds be secured.

8 APPRAISAL FINDINGS AT THIS STAGE

Part 2 of the SA Report presents an appraisal of the Proposed Submission VALP. Appraisal findings are presented as a series of narratives under the 'SA framework' headings. The conclusion from each narrative is repeated here.

Work to appraise thematic policies is ongoing, and will be completed prior to publication.

9 Next steps

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

10 Plan finalisation

Subsequent to publication, the main issues raised will be identified and summarised by the Council, who will then consider whether the plan can still be deemed to be 'sound'. Assuming that this is the case, the plan (and the summary of representations received) will be submitted for Examination.

At Examination a government appointed Planning Inspector will consider representations (in addition to the SA Report and other evidence) before determining whether the plan is sound (or requires modifications).

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

11 Monitoring

At the current time, there is a need only to present 'measures envisaged concerning monitoring'.

Work to consider monitoring measures is ongoing, and will be completed prior to publication.