

Sustainability Appraisal (SA) of the Milton Keynes Site Allocations Plan

SA Statement

July 2018

REVISION SCHEDULE					
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1	July 2018	SA Statement published alongside the adopted version of the Milton Keynes Site Allocations Plan	Mark Fessey Principal Consultant	Steve Smith Technical Director	Steve Smith Technical Director

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1 INTRODUCTION

Background

- 1.1.1 The Milton Keynes Site Allocations Plan was submitted to Government, for Examination by an appointed Planning Inspector, in early 2017. Following an examination process, the Inspector published a report into the Plan's legal compliance and soundness in June 2018. The Inspector concluded that the plan is legally compliant and sound, subject to a series of modifications being made. The Local Plan, incorporating modifications, is recommended for adoption at a Full Council meeting on 188th July 2018.
- 1.1.2 A parallel process of Sustainability Appraisal (SA) was undertaken alongside plan-making. SA is a mechanism for considering and communicating the likely effects of an emerging plan, and reasonable alternatives, with a view to achieving sustainable development.
- 1.1.3 The SA process was undertaken 'in-house' by Milton Keynes Council. AECOM was then commissioned to prepare this SA Statement.

SA explained

- 1.1.4 It is a requirement that SA involves a series of procedural steps. The final step in the process involves preparing a 'statement' at the time of plan adoption. The aim of the SA Statement is to present –
- 1) The 'story' of plan-making / SA up to the point of adoption
 - Specifically, the Regulations¹ set a requirement to: *"summaris[e] how environmental considerations have been integrated into the plan or programme and how the environmental report... the opinions expressed... and the results of consultations... have been taken into account... and the reasons for choosing the plan... as adopted, in the light of the other reasonable alternatives dealt with."*
 - 2) Measures decided concerning the monitoring of plan implementation.

This SA Statement

- 1.1.5 This is the Milton Keynes Site Allocation Plan SA Statement, and hence considers **(1)** and **(2)** in turn. This Statement concludes by presenting a checklist of legal requirements, with a view to demonstrating legal compliance.

2 THE PLAN-MAKING / SEA 'STORY'

2.1 Introduction

- 2.1.1 Steps in the SA process were as follows -

- 1) Site options appraisal informed preparation of the Proposed Submission Plan
- 2) The Proposed Submission Plan was subjected to appraisal, with findings presented for consultation within the SA Report
- 3) The SA Report, and consultation responses received, were taken into account by the Inspector, as part of the process of examining and modifying the plan.

- 2.1.2 Each step is discussed, in turn, below.

¹ The information to be provided in the Statement is listed in Article 9 of the SEA Directive / Regulation 16 of the Regulations.

2.2 Site options appraisal

2.2.1 The following summary of the site options appraisal process is presented within the Inspector's Report (June 2018) -

"Site appraisal was directed by a three stage assessment process detailed in the Sustainability Appraisal Report (SA) (and its appendices). It was guided by the application of 18 sustainability indicators, encompassing economic, social and environmental dimensions.

Such an assessment process is a tool to enable a reasonably consistent and disciplined analysis of the sustainability credentials of a range of potential development sites and the likely impacts of development upon them. It provides a clear and consistent framework for reaching conclusions about appropriate allocations and for the consideration of alternative options (i.e. the range of different sites considered for allocation).

That said, the use of an assessment methodology necessarily involves the application of judgement. Disagreement about such judgement, in relation to sites (and, thus, alternative options that were not pursued), appears to lie at the heart of many objections.

All options have, however, been assessed In line with regulatory requirements, there is a focus on explaining how sustainability considerations have been taken into account and influenced plan-making, including as a result of alternatives appraisal and other SA work, and consultation on plan / SA documents.

All options have, however, been assessed against the same sustainability objectives on a like-for-like basis so as to provide a meaningful guide to the Council about the approach that it should pursue."

2.2.2 With a view to expanding on the Inspector's summary of the process, it is worthwhile drawing attention to the following key sections within the SA Report (2016) -

- Paras 3.9 to 3.27 - explain how site options were arrived-at, and explains the appraisal methodology.
- Appendix 2 - presents a summary appraisal of each of the site options, with sites grouped according to overall performance (see paras 3.23 to 3.25 for an explanation of grouping).
- Appendix 3 - presents a detailed appraisal proforma for each of the site options.

2.3 Appraising the plan / preparing the SA Report

2.3.1 Table 6 of the SA Report presents an appraisal of each of the preferred (i.e. submission) sites, with Table 7 then considering the overall effects of the plan as a whole - i.e. the proposed sites in combination, taking into account site specific policy - in respect of the SA framework.

2.3.2 A key point to note is the conclusion reached in respect of the SA objective to: "Improve availability and accessibility of **key services and facilities**." The appraisal finds that the plan will result in negative effects, on the basis that the proposed allocations are all small sites that will not deliver new community infrastructure, e.g. schools or health facilities. Furthermore, it is the case that the sites do tend to not be located close to existing facilities with capacity (an issue which the report describes as 'insurmountable', given the site available / in contention. The report (Table 7) describes how concerns are reduced on the basis that: "Prescriptive policies used to mitigate any severe impact on schools and health services in particular." Furthermore, the report (para 3.26) explains that: "There is no significant spatial clustering of proposed allocations... Therefore the cumulative negative impact of the draft plan is generally considered to be low."

2.4 Plan finalisation

2.4.1 On the basis of the submitted evidence (including the SA Report) and new evidence gathered during the examination (including both further written representations and those made verbally during the hearing) the Inspector identified a need to make a number of modifications to the plan, as submitted. Most notable is the Inspector's decision to remove the following sites -

- SAP2 and SAP7 - are described by the Inspector as "constrained", with the inspector going on to explain that: *"It has not been demonstrated to my satisfaction that residential development, which would provide suitable **living conditions** for future occupiers, could be accommodated upon them."* [emphasis added]
- SAP11 and SAP13 - are both in use for employment/retail purposes, with the Inspector explaining that: *"There is no substantive evidence before me that residential development upon them would be achievable over the plan period. As such, I do not consider that there is any reasonable prospect of them contributing to the delivery of the aims of the SAP."*

2.4.2 With regards to the remaining sites, the Inspector concludes: *"The remaining sites are located in suitable areas for residential development, with indicative capacities that appear to be broadly appropriate having regard for their immediate context and for site specific issues."*

2.4.3 The main residual issue/impact highlighted by the Inspector relates to the SA objective to: "Sustain **economic growth** and competitiveness across the Borough". The Inspector highlights that Sites SAP18, SAP19 and SAP20 are covered by employment allocations (and Site SAP6 has an historic designation as an employment site, although it is unclear whether this designation is still extant) however, the Inspector finds redevelopment for residential appropriate on the basis that:

"Their allocation for residential development has clearly been considered carefully, informed by an Economic Growth and Employment Land Study (EGELS) that provides a detailed assessment of employment land needs across Milton Keynes. Although the EGELS suggests that Milton Keynes will require a future uplift in the amount of available employment land (to be allocated through Plan:MK), this is indicated as being for B8 use... The potential SAP sites are not ideally located for such use, having regard to their local context and distance to the strategic road network. In addition, all are quite some way down the rankings of employment sites in Milton Keynes, considered in the EGELS, in terms of their potential for employment development... In short, the allocation of these sites for housing would have, at most, a negligible effect on the overall supply of vacant employment land in Milton Keynes. There would be no impact upon the strategic aims of the CS, which seeks to maintain an appropriate balance between job creation and housing delivery. Their release would also accord with paragraph 22 of the NPPF."

3 MEASURES DECIDED CONCERNING MONITORING

3.1.1 Chapter 7 (Monitoring) of the Site Allocations Plan states -

“The Site Allocations Plan consists of policies for only residential development. Separate monitoring criteria and indicators are therefore not required for the plan. The delivery of each individual allocation will be monitored through the Council's existing procedure for monitoring housing land supply. This consists of maintaining a housing trajectory (in accordance with the National Planning Policy Framework's requirement for a list of specific deliverable sites sufficient to provide five years' supply of housing land). This will be updated quarterly to reflect latest completion rates and any other 'intelligence' that has been gathered by the Council's Joint Housing Monitoring Team.

Each allocation in the Site Allocations Plan should, in theory, be deliverable within five years. However, the delivery of each site will be contingent on several factors including the timing and outcome of the plan's Public Examination as well how the development industry acts upon the new 'permission in principle' process.”

4 CONCLUSIONS ON THE SA PROCESS

4.1.1 This SA Statement demonstrates that a robust SA process has been progressed alongside plan-making, with appraisal findings feeding in to decision-making at key junctures. Most importantly, in terms of compliance with both the SEA and Local Planning Regulations, the SA Report was published alongside the proposed submission version of the plan in 2016, presenting the required information. The report served to inform representations on the plan, and then served to inform plan finalisation.

4.1.2 This SA Statement is the final step in the SA process. Its aim is to explain the ‘story’ of the plan-making / SA process, and also present measures decided concerning monitoring. **Table 4.1** serves to demonstrate that this report presents the required information.

Table 4.1: Regulatory checklist

The SA Statement must...	How has this report presented the required information?
Summarise how environmental (and wider sustainability) considerations have been integrated into the plan	This report has sought to provide examples of key sustainability considerations that have been highlighted through appraisal and consultation, which in turn were taken into account. Specifically, key issues discussed relate to access to services/facilities, and loss of employment land.
Summarise how the SA Report and consultation responses received, as part of the Draft Plan / SA Report consultation, have been taken into account when finalising the plan.	This SA Statement relies on the Inspector's Report to present a summary of key issues/impacts raised through the Draft Plan / SA Report consultation. As discussed, access to services/facilities and loss of employment land, were key issues. Other issues relate to meeting housing needs specific to the rural area (see paras 13 and 14 of the Inspector's Report) and biodiversity (see para 38).
Summarise the reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with.”	The SA Report (2016) presented a discussion of the justification for the Proposed Submission Plan (see sections 2.2 and 2.3, above), whilst the Inspector's Report (2018) presents the Inspector's reasons for supporting the final plan (see Section 2.4, above).