

Inspector's Advice Note on Sustainability Appraisal for Plan:MK

14 August 2018

The purpose of this note is to set out some further thoughts as I reflect on the evidence from the discussions at the Stage 1 hearing. As the scope of the main modifications becomes clearer, it is evident that an addendum/update to SA will be required. This note raises additional matters which the Council should reflect upon when preparing the SA addendum/update.

My principle concern is the clarity of reasoning within SA around the strategic site selection process, principally housing but also employment. I note that the Council has applied the step-wise approach set out in the flowchart at PPG paragraph 11-013-20140306. That said, in seeking to develop a focussed SA report, there are number of matters which still leave me uncertain on whether or not the SA work is sufficiently clear. I set these out below, in no particular order:

- (1) In combination, Appendix III and Table 6.4 do not provide the 'typical' systematic evaluation of the effects of each shortlisted housing site against the SA objectives. I appreciate the Council has sought to pursue a "targeted approach" (for "pragmatic considerations relating to available time and resources") but in doing so I find the commentary lacks a sufficient degree of transparency as to how the significant positive and negative effects of each shortlisted site option have been appraised, to ultimately ensure that what lies at the heart of Plan:MK – a sustainable pattern of development – will be the outcome. Table 6.4 summarises what is an already a brief collective discussion of the sites in Appendix III and again it is not clear on whether negative effects associated with sites are insurmountable (can they be mitigated?) or whether a particular issue/effect and related judgement has been decisive in why a site has not progressed into the small pool of reasonable alternatives. I recognise that pages 45-65 of the March 2017 initial SA report provide a more characteristic, systematic appraisal of options A-G but again there is limited discussion of significance of the effects and potential mitigation) in determining whether or not these sites comprise reasonable alternatives. In terms of consistency I am to some extent unclear as to where Shenley's Den Farm fits within the initial March 2017 SA work – was it part of the wider WEA assessment? Without prejudging the outcome, there would appear to be merit in revisiting and bolstering the MK urban edge assessment to be clearer on: where the balance of significant +/- effects lies (all appraised sites appear to have pros and cons); where there are negative effects the reasonableness or otherwise of mitigation; and to summarise what are the particular negative effects that enable a clear conclusion that the site would not be a reasonable alternative.
- (2) The SA report focuses on strategic housing sites in developing reasonable alternatives and the preferred option. There is no directly comparable assessment of strategic employment sites (noting their identification at Figure 6.8 and the introduction of two employment sites into Table 6.6). This needs to be addressed in Chapter 5 in relation to land North East of Newport Pagnell as a minimum.

- (3) Whether or not Part 2 of the October 2017 report provides sufficient clarity on the likely significant effects on the environment, including short, medium and long term effects; permanent and temporary effects, positive and negative effects and secondary, cumulative and synergistic effects on issues such as biodiversity, population, human health, soil, water, air, climatic factors, cultural heritage and landscape (amongst others). Whilst I note the general absence of comment from the consultation bodies on the SA report, I nonetheless remain unclear on how the 57 narratives presented in Chapter 10 and the appraisal in chapters 7 and 8 (with Appendix IV) of the SA Report constitute the 'environmental report' required by Schedule 2 of the Regulations 2004 in terms of systematically laying out the timeframe, status, impact and synergies of the environmental effects.
- (4) In the SA conclusion section (p.11) of the Council's response of 3rd June 2018 to my initial observations it states that the SA report "...reflects AECOMs tried-and-tested approach to reporting, which is designed to ensure that regulatory requirements are clearly met...." Are there comparable SA reports to that for Plan:MK (in terms of the 'targeted' and primarily narrative approach) which have been accepted in Plan examinations elsewhere?

I have heard the submissions from those discontented with the SA methodology and outputs and I am not inviting further comment, either in response to this note or as part of the forthcoming Stage 2 hearings. SA remains a 'live' issue during the examination and can be revisited, supplemented and refined at any time. Additional representations on SA can be made as part of the main modifications consultation.

Accordingly, as part of my final administrative session on 30 August 2018 I intend to discuss, with the Council, a number of matters including the likely extent of main modifications and also the accompanying SA addendum. In highlighting the 4 areas above now, I am intending to provide some structure to that part of the discussion and would welcome a positive dialogue with the Council/AECOM on whether these concerns can be alleviated by what is already submitted and/or by further appraisal work.

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Inspector.