Core Strategy

Sustainability Appraisal Report
February 2010

www.milton-keynes.gov.uk/core-strategy-publication
1 Non Technical Summary

1.1 The Core Strategy is the main strategic document in the Local Development Framework, providing guidance on how Milton Keynes will develop up until 2026.

1.2 The planning regulations require all planning documents to be subject to Sustainability Appraisal (SA) to ensure that they contribute to achieving sustainable social, environmental and economic development. This process has been undertaken for the Core Strategy and has incorporated the requirements of a Strategic Environmental Assessment (SEA). This assessment is based on the ‘Environmental Assessment of Plans and Programmes Regulations, 2004’, which implement European Directive 2001/42/EC on the assessment of the environmental effects of certain plans and policies.

1.3 In line with these regulations this non-technical summary has been produced to give a simple overview of the findings of the report.

What is the Core Strategy?

1.4 The Core Strategy will be a key document in delivering other strategic plans, particularly the Sustainable Community Strategy. It will replace the strategic planning policies for the Borough, currently set out in the adopted Local Plan (2005), by identifying a vision, objectives and a development strategy for the Borough. The strategy will be used to inform the production of other more detailed documents in the LDF.

1.5 Part of the evidence for the Core Strategy is the work undertaken by Milton Keynes Partnership (MKP) who have prepared a Growth Strategy for the Borough. The strategy looks at the strategic locations and directions of growth and has been subject to an individual SA and SEA. The findings of the Growth Strategy SA Report have been documented in this report and have gone towards developing the Milton Keynes Core Strategy.

The baseline situation

1.6 The first step in carrying out SA/SEA was to establish the baseline situation. Collecting and assessing the social, environmental and economic characteristics of Milton Keynes identified a series of key issues and trends, both positive and negative, currently affecting the Borough. These issues informed the preparation of the strategy and identified areas that the SA needed to consider. As a result of consultation on the Scoping Report, additional issues that needed consideration were added to the list. An overview of the issues identified from the baseline review and consultation are in Table 1.1 ‘Overview of the sustainability issues and trends in Milton Keynes’.

Table 1.1 Overview of the sustainability issues and trends in Milton Keynes

<table>
<thead>
<tr>
<th>Social issues</th>
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</thead>
<tbody>
<tr>
<td>The rate and level of population growth</td>
</tr>
<tr>
<td>Rising levels of old and young population</td>
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<tr>
<td>Changes in ethnic composition</td>
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<tr>
<td>Pockets of deprivation within the city</td>
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<tr>
<td>Rising levels of crime</td>
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<tr>
<td>Poor life expectancy and mortality rates</td>
</tr>
<tr>
<td>Relatively poor educational attainment</td>
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<tr>
<td>Environmental issues</td>
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<tr>
<td>Low levels of brownfield development</td>
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<tr>
<td>Continued creation and protection of landscape character and wildlife habitats</td>
</tr>
<tr>
<td>Pressure to protect cultural character and heritage</td>
</tr>
</tbody>
</table>

1 The Growth Strategy and background documents can be found at: http://www.miltonkeynespartnership.info/future_plans/MK_2031_documents.php
Social issues
Increasing levels of waste
Good recycling levels
Comprehensive approach to flood risk and relatively high water quality
Low levels of air pollution
Influence of the car

Economic issues and trends
Sustained economic growth
Relative housing affordability and good levels of affordable housing completions

Review of relevant plans, programmes and policies (PPPs)

1.7 Under the regulations, the SA has to take into account other PPPs that will impact on the production of the Core Strategy. A review of these documents took place as part of the Scoping Report and a number of cross-cutting issues were identified, which the production of the strategy and the SA has taken into account. A number of particularly significant PPPs have subsequently been published and a summary of these are included in Technical Document 4 Appendix 15. These issues can be seen in Table 1.2 ‘Sustainability issues identified from PPP review’.

Table 1.2 Sustainability issues identified from PPP review

<table>
<thead>
<tr>
<th>Issue</th>
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<tbody>
<tr>
<td>Reduce the use of non-renewables and protect local water and mineral resources</td>
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<td>Protect and manage soil resources</td>
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<td>Bring previously developed land back into use and promote development on accessible sites</td>
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<td>Provide housing for those that need it</td>
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<td>Need to improve educational attainment and skill levels</td>
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<td>Balance economic growth against protection of the environment</td>
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<td>Maintain high levels of employment</td>
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<td>Protect and provide space for leisure and recreation</td>
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<tr>
<td>Promote ‘destination’ appeal</td>
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<tr>
<td>Recognise and promote culture</td>
</tr>
<tr>
<td>Use innovative ideas and good design</td>
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<tr>
<td>Protect and enhance wildlife habitats and biodiversity</td>
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<tr>
<td>Protect and enhance landscape character</td>
</tr>
<tr>
<td>Consider opportunities to tackle deprivation amongst existing communities and provide for existing residents</td>
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Development of the Sustainability Appraisal Framework

1.8 To assess and evaluate the sustainability impact of the options and policies in the Core Strategy, a framework of objectives, sub-objectives (or targets) and indicators was developed. This framework adapted the sustainability objectives set out for the South East region (in the Integrated Regional Framework) giving them a local interpretation, reflecting the issues raised in the previous sections. It also had regard to the framework prepared to appraise the Growth Strategy, to ensure continuity between the two parts of the appraisal. The objectives, sub objectives and indicators making up the framework can be seen in Technical Document 1 Appendix 4.
Compatibility of the objectives

To ensure that the sustainability objectives were compatible with those of the Core Strategy they were compared in a matrix. The process identified a number of areas of compatibility, but also some areas of conflict. The main areas of conflict include:

- The need to increase housing delivery and support a growing economy whilst maximising environmental protection,
- The need to reduce reliance on the car whilst maximising social and economic benefits,
- The need to protect heritage assets whilst facilitating change and supporting the roles of older parts of the Borough; and
- Enhancing the role of CMK whilst increasing the vitality and viability of town, district and local centres.

The need to mitigate these conflicts, along with the others listed in Technical Document 2 Appendix 6, has been a consideration in the advice and recommendations provided through the appraisal of the options and the preferred policy directions.

Since the Preferred Options stage the Core Strategy objectives were revised to make them more Milton Keynes specific and meet SMART guidelines. Thus a re-appraisal of the compatibility with the SA objectives was required. A summary is set out in Section 14 ‘Task D2 Appraising significant changes’ and Technical Document 4 Appendix 17.

Statement of the difference the process has made to date

The Growth Strategy

The appraisal of the Growth Strategy initially helped to shape the most appropriate options for the spatial growth of the city. An assessment of the ‘preferred option’, based on a set of spatial concepts (which set out the principles of development), highlighted areas where additional detail would be needed to ensure that growth occurred in a fully sustainable manner. The process suggested additional detail on design and development principles, climate change, resource and waste management, water resources, transport and archaeological and heritage interest could help deliver a more sustainable strategy. These have been seen as key areas of work to be covered by the Core Strategy, to ensure the spatial strategy will be delivered in a sustainable manner.

Appraisal of Core Strategy Options and the Preferred Options

The first stage of the process predicted the impacts of the strategic options put forward to help achieve the objectives of the Core Strategy. This process informed the plan writers of their differing sustainability impacts of the various options and helped to inform the production of the Preferred Options by identifying the most sustainable options considered within each policy area. This part of the process also helped to highlight general messages that could be carried forward though the Strategy writing process, including the importance of high quality design and ensuring efficient and effective movement patterns in achieving sustainability objectives.

It was also noted through the initial appraisal of the options that deliverability needed to be a key consideration in developing the preferred options. It was acknowledged that aspirational targets for environmental standards and service provision may appear to help achieve sustainability objectives but if they are over onerous they could have the effect of slowing housing delivery.
1.15 The second part of the process involved assessing the impact of the Preferred Options. This part of the process helped to inform production of the Pre-Submission version of the Core Strategy, by identifying areas where the sustainability of policies could potentially be enhanced, and by suggesting refinements to the options put forward. This guidance includes suggestions to detailed policy wording and additional criteria that would enhance the strategy’s ability to achieve the social, environmental and economic objectives set out in the appraisal.

Appraisal of the Pre-Submission Core Strategy

1.16 The latest stage of the process has involved a number of tasks. Through an audit of the Pre-Submission document the need for any further appraisal work has been assessed. This auditing process has also shown where the recommendations of the SA at the Preferred Options stage have been implemented in the Pre-Submission version of the Core Strategy. The process showed that some Pre-Submission policies should be re-appraised, but the majority were a combination of various preferred policy directions from the Preferred Options stage and no further appraisal was required.

A statement of the likely significant impacts of the plan

1.17 The location of housing development element of the plan was assessed separately as part of the MK2031 process to the more detailed policy directions contain in the Preferred Options Report. These policy directions have evolved into policies in the Pre-Submission Core Strategy. The overview of the Growth Strategy appraisal states that the preferred strategy, overall, will have a positive sustainability effect. Very few adverse sustainability effects were found, but where they were found they tended to be related to environmental issues. These were particularly pronounced in the growth areas assessment compared to the assessment of the urban area. The development of policy areas has worked to mitigate these potentially adverse effects.

1.18 The sustainability of the individual policies in the Core Strategy, prepared to support the sustainable delivery of the spatial strategy, has also been assessed. This assessment showed that the Core Strategy will broadly help to achieve many strategic sustainability objectives. From the appraisal it emerged that the plan would appear to support the delivery of key sustainability elements, such as promoting energy efficient development, supporting a modal shift from the car, minimising the risk of flooding and supporting town centre viability.

1.19 Areas of concern, which will need to be considered in more detailed planning documents, include the impact on the Borough’s cultural heritage and protection of biodiversity. It was felt that the level of growth to be achieved and helping to achieve social and economic improvement, could compromise environmental objectives through the loss of greenfield land and the outputs of development.
2 Introduction

This Sustainability Appraisal Report accompanies the Pre-Submission Core Strategy and is an update of the Sustainability Report (September 2007). The chapters relating to Tasks A1 - B5 record stages of the Sustainability Appraisal undertaken up to the Preferred Options publication and remain largely unchanged. Where a change has occurred it is highlighted within each Task.

This report is accompanied by Technical Documents 1, 2, 3 and 4. These contain the full work for each task which this report has summarised. Where appropriate, the report highlights which technical document should be referred to to find additional details.

If minor changes are required to be made for the Submission Sustainability Appraisal Report, then new versions of the document will be issued. If not then this version of the document referring to the "Pre-Submission" Core Strategy will be used at submission stage and "Pre-Submission" should be read as "Submission".

2.1 In 2004, the Government introduced a new planning system under the Planning and Compulsory Purchase Act (2004). As a result, Milton Keynes Council is now required to begin the process of replacing its Local Plan with a Local Development Framework, made up of individual Local Development Documents (LDDs), which take the form of Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs).

2.2 The Council’s Local Development Scheme (LDS) sets out which DPDs and SPDs the Council will produce. It identifies that the Council intends to produce a Core Strategy to provide strategic guidance on the future development of Milton Keynes.

2.3 Under the new planning system, the Government has introduced the requirement for Sustainability Appraisals (SA) to be carried out for all DPDs, including the Core Strategy. This is primarily a response to the increased national and international commitment to sustainable development. The purpose of SA is to ensure the integration of social, environmental and economic considerations into the preparation of local development documents. It also allows possible unsustainable elements of plans to be highlighted at an early stage and creates an opportunity, where possible, for them to be altered to make plans more sustainable.

2.4 As well as the Government’s requirement for SA, EU Regulations require the assessment of how other plans; policies and programmes influence any new DPD, through a SEA. There are many similarities in the SEA and the SA processes, and the Government has produced guidance (3) on how the requirements of SEA can be met alongside those of SA within one process. Therefore, whilst reading this document it should be assumed that, unless stated otherwise, when SA is mentioned, this incorporates the requirements of SEA.

2.5 The process of SA allows the current state of an area to be analysed, sustainability issues identified and for the development of a framework of objectives and indicators, against which success of the plan can be predicted and measured. The framework can be used to determine how far the plan will go towards delivering sustainable development and to inform alterations to policy, helping to bring them in line with sustainability requirements.

2.6 This Sustainability Appraisal Report has been produced for comment alongside the Core Strategy Pre-Submission Version. It records the findings of the initial appraisal of the options considered for the Core Strategy, assesses the sustainability of the Council’s preferred policy directions, contained within the Preferred Options, and appraises any significant changes in the Core Strategy Pre-Submission Version. The report also

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3 Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents (November 2005)
highlights changes made from the Preferred Options to Pre-Submission stage that are not considered significant. It also records the findings from the SA of the Milton Keynes Growth Strategy, a key piece of work informing future growth in the Borough.

All comments must be received before 5pm on Wednesday 31st March 2010. You can:

- email your comments to us at corestrategy@milton-keynes.gov.uk
- fax them to 01908 252330
- send them by post using our freepost address (no stamp needed) to:

  Development Plans team
  Milton Keynes Council
  FREEPOST NATE 294
  Spatial Planning
  Civic Offices
  1 Saxon Gate East
  Central Milton Keynes
  MK9 3BR

Habitats Regulations Assessment (HRA)

2.7 The Core Strategy policies have also been screened for their impact on the integrity of European sites, as required under Articles 6(3) and 6(4) of the Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora. The HRA was undertaken in-house and submitted to Natural England (the statutory consultee) for their screening opinion.

2.8 On the 11 June 2009 Natural England, agreed that the plan is unlikely to have significant effects on any European sites either alone or in combination with any other plans or projects and that an Appropriate Assessment of the Core Strategy is not required.

2.9 The Milton Keynes Council Appropriate Assessment Screening Report (April 2007) is available in full from: http://www.miltonkeynes.gov.uk/core-strategy-publication

Appraisal methodologies

2.10 The approach adopted in undertaking this SA has followed the Guidance set out by the Government.

2.11 There are two key stages to the SA process

- Scoping Report setting the context and scope of the appraisal
- Sustainability Appraisal Report - which outlines how sustainability factors have helped to refine the contents of the Core Strategy.

2.12 The Spatial Planning Division has taken the lead role in undertaking the appraisal, with input, as appropriate, from officers from other departments, such as Countryside, Economic Development and Highways.

2.13 The major issue of directions and locations of growth has been consulted on and appraised separately to this report. A report on six growth alternatives for Milton Keynes, as part of the MK2031 process, was prepared by Milton Keynes Partnerships in 2006, which, along with two further options raised through the consultation process.
The Growth Strategy SA was independent of the appraisal carried out on the Core Strategy options, and a separate Sustainability Report was prepared for the work in July 2006. The study is a major piece of work that has informed the production of the Core Strategy, therefore, where appropriate, the findings the Growth Strategy SA Report have been incorporated into this report to provide a comprehensive overview of how sustainability issues have been considered for all components of the strategy. The methodology adopted for this appraisal also gives consideration to the approach taken to the Growth Strategy SA to ensure an element of continuity in the process.

2.14 This work was carried out to inform the preparation of the South East Plan, a higher level plan, and it was therefore not deemed appropriate or necessary to subject the directions of growth to SA again at the Preferred Options stage. However, as the Core Strategy has progressed the locations and level of growth have altered. In addition to this, a representation received at the Preferred Options stage sought further consideration for a site for 5,000 homes on land east of the M1. The Proposed Changes to the South East Plan also included development east of the M1. As a result of this, additional appraisal work on the options for growth has been undertaken and included as part of this Pre-Submission Sustainability Appraisal.

2.15 Further detailed SA work will need to be carried out as part of the process for allocating specific sites through the Site Allocations Development Plan Document.

The Scoping Report

2.16 The Scoping Report covered tasks A1 to A5 following government guidance on the SA and SEA process(4).

2.17 The first stage of the appraisal was to collect the baseline data, and draft a Sustainability Appraisal Framework, including objectives and indicators that would be used to carry out the appraisal. This stage also saw a review of relevant plans, policies and programmes that established key messages from European, national, regional and local policy.

2.18 The three statutory consultees(5), plus other appropriate stakeholders and organisations, were consulted on the scoping report for 5 weeks between 4th October and 8th November 2006, inline with task A5 of the government guidance. Eleven responses to the consultation were received. These helped to confirm that all of the relevant sustainability issues had been identified and that the draft framework was comprehensive enough to support the preparation of the strategy. A summary of the responses received can be seen in Technical Document 1 Appendix 1, along with consequential changes made.

The Sustainability Appraisal Report (Core Strategy Preferred Options)

2.19 The principal objective of the report was to record the findings from the appraisal of the strategic options, emerging from the Issues and Options discussion paper. This early part of the process informed the plan writers as to the general sustainability of the options under consideration, ensuring that decisions taken as to the preferred options considered sustainability impacts. This part of the process covered tasks B1 to B3 of Government Guidance.

2.20 The report also appraised the Council’s Preferred Policy directions. The appraisal of the policy directions allowed final suggestions to be made on issues such as final policy wording and additional criteria, to help ensure the final policies fully encapsulate the principles of sustainable development. The second part of the report also set out how the effects of implementing the plan will be monitored. This part of the report covers tasks B4 to B6 of the Government Guidance.

4 This guidance is available at http://www.communities.gov.uk/publications/planningandbuilding/sustainabilityappraisal
5 The three statutory undertakers, set out in by the SEA directive, are Natural England (previously English Nature and the Countryside Agency), the Environment Agency and English Heritage.
The Pre-Submission Sustainability Appraisal Report (Pre-Submission Core Strategy)

2.21 Following consultation on the preferred options report and accompanying sustainability appraisal report in September 2007, the Council has progressed the Core Strategy through to the Pre-Submission version. This Pre-Submission Sustainability Appraisal Report builds on the Preferred Options Sustainability Report by showing changes to the Core Strategy since the Preferred Options report was published. The focus of this report is Stage D "appraising significant changes". As the Pre-Submission Core Strategy has undergone a comprehensive re-structuring with preferred policy directions being carried forward into different Pre-Submission policies a process of identifying the changes was undertaken in order to assess whether there had been any significant changes to the plan. Section 14 14 'Task D2 Appraising significant changes' report documents the process. Further appraisal work has also been undertaken to reflect changes to the Core Strategy objectives and to address consultation responses received in relation to the Preferred Options SA report.

2.22 In line with the requirements of stage C of Government guidance, the Spatial Planning Division of Milton Keynes Council has prepared the report. The report should be read alongside the Sustainability Appraisal Report prepared by MKP, to accompany the Growth Study options

Difficulties encountered in compiling the information or carrying out the assessment

2.23 The appraisal of policies may include considerable levels of uncertainty which can lead to difficulties. The following levels of uncertainty must be taken into account when looking at the results:

- Uncertainty about exact implementation – with a high level strategy, such as the Core Strategy, it is difficult to assess to a high degree of detail
- Lack of precision – environmental, social and economic issues can be difficult to quantify or measure with a high degree of accuracy, which leads to the need for individual interpretation to play an important role
- Scientific uncertainties – variability in data and collection measures will always exist to a greater or lesser degree. Some data required may also not be readily available to allow accurate assessments to be made.
- Natural variability – there is often considerable natural variability in sustainability issues, for example the weather and people’s actions. These lead to an element of uncertainty in the impact of certain issues.

2.24 Research has been used to quantify the impacts of options and policies where possible. However, where research is not available professional judgment has been used. It is accepted that there is an element of personal opinion in this process which is a limitation of carrying out the assessment. To mitigate against this, and to ensure continuity in the appraisal, a set of assumptions have been prepared to clarify what achievement of each of the objectives means and a list of general assumptions showing the relationships between factors. These can be found in Technical document 2 Appendix 10.
3 Background

The Concept of Sustainability

3.1 There are many definitions of sustainable development, however the widely accepted definition comes from the World Commission on Environment and Development in 1987:

“Development which meets the needs of the present without compromising the ability of future generations to meet their own needs”.

3.2 The UK Strategy for Sustainable Development ‘Securing the Future’, was published in March 2005, building on and reviewing the 1999 strategy ‘a Better Quality of Life’. Within this strategy, the five guiding principles of UK sustainability development are set out. All five of these need to be respected if a policy is going to be sustainable:

- **Living within environmental needs** ensure that natural resources needed for life are left unimpaired for future generations
- **Ensuring a strong, healthy and just society** meeting the needs of all sections of the community, with equal opportunities and social cohesion.
- **Achieving a sustainable economy** build an economy that provides prosperity for all and in which environmental costs are paid for by those who impose them.
- **Promoting good governance** promote participation and engage with all levels of society
- **Using sound science responsibly** take into account sound evidence and public attitudes/values in policy development

3.3 In developing any plans, policies and programmes, authorities need to ensure that these principles are being addressed.

The Sustainability Appraisal

3.4 The purpose of the SA is to ensure that the principles of sustainability are taken into account in the production of the Core Strategy. This means consideration must be given to the environmental, social and economic effects of the plan.

3.5 The appraisal combines two processes:

- **Strategic Environmental Assessment** - The SEA is the process for assessing the environmental impact of plans, programmes and policies to satisfy EU directive 2001/42/EC. The SEA regulations detail specific procedural and content requirements, including setting out statutory consultees.
- **Sustainability Appraisal** - The SA is a process required under the Planning and Compulsory Purchase Act 2004 to identify whether plans and policies promote the principles of sustainable development. It provides an opportunity to adapt plans to incorporate a more sustainable approach.

3.6 The requirements of both processes can be run concurrently under advice laid out by the Government in its guidance paper of November 2005, ‘Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks’.

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7 The Environmental Assessment of Plans and Programmes Regulations 2004
### Purpose of this SA Report

**3.7** As outlined in Chapter 2 this report details the development of the Core Strategy options and examines how the policies of the Core Strategy contribute to achieving the aim of sustainable development. It enables the determination of the likely significant social, environmental and economic impacts of the plan to be identified and outlines ways in which these impacts can be mitigated (or enhanced in the case of positive impacts) to help the plan achieve the objective of sustainable development.

### Compliance with the SEA Directive/regulations

**3.8** This report has been prepared in accordance with the government guidance on Sustainability Appraisal. It fulfils the requirements of the Planning and Compulsory Purchase Act 2004 for the production of the Core Strategy to be subject to SA. It also meets the requirements of the Strategic Environmental Assessment Directive (2001/42/EC) for the plan to be subject to environmental assessment, given the potentially significant impact of the plan on the locality. The way this report meets the specific requirements of the SEA directive are signposted in the table below.

**Table 3.1 Meeting the SEA Requirements**

<table>
<thead>
<tr>
<th>Requirement of the SEA Directive</th>
<th>Where covered</th>
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<tbody>
<tr>
<td>a) a outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes</td>
<td>4 'Task A1 Consideration of other plans, programmes and policies', 6 'Task A3 Identifying key sustainability issues and trends', 14 'Task D2 Appraising significant changes', Appendices 2, 8, 15, 16 and 17</td>
</tr>
<tr>
<td>b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme</td>
<td>5 'Task A2 Baseline Data', Appendix 3</td>
</tr>
<tr>
<td>c) the environmental characteristics of areas likely to be significantly affected</td>
<td>5 'Task A2 Baseline Data', 6 'Task A3 Identifying key sustainability issues and trends', Appendix 3</td>
</tr>
<tr>
<td>d) any existing environmental problems which are relevant to the plan or programme, including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC</td>
<td>5 'Task A2 Baseline Data', 6 'Task A3 Identifying key sustainability issues and trends', Appendix 3</td>
</tr>
<tr>
<td>e) the environmental protection objectives, established at international, community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation</td>
<td>4 'Task A1 Consideration of other plans, programmes and policies', 7 'Task A4 Developing the SA Framework', 14 'Task D2 Appraising significant changes', Appendices 2, 4, 5 and 15</td>
</tr>
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<td>f) the likely significant effects on the environment, including issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and interrelationship between the above factors</td>
<td>9 'Task B2 Developing the Core Strategy options', 10 'Tasks B3 &amp; B4 Predicting and evaluating the effects of the Core Strategy', 11 'Task B5 Mitigating adverse/maximising beneficial effects - Preferred Options assessment', 14 'Task D2 Appraising significant changes', Appendices 6, 10, 12 and 17-26</td>
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<tr>
<td>g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme</td>
<td>11 'Task B5 Mitigating adverse/maximising beneficial effects - Preferred Options assessment',</td>
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### Requirement of the SEA Directive | Where covered
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h) 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 | 14 'Task D2 Appraising significant changes', Appendix 12
i) a description of the measures envisaged concerning monitoring in accordance with Art 10 | 12 'Task B6 Proposals for monitoring the significant effects of implementing the Core strategy'
j) a non-technical summary of the information provided under the above headings | 1 'Non Technical Summary'
3. Background
4 Task A1 Consideration of other plans, programmes and policies

4.1 A review of existing plans, policies, programmes (PPPs) and other sustainability objectives was undertaken during the preparation of the Sustainability Appraisal Scoping Report to establish the key objectives, indicators and targets that will influence the production of the Core Strategy and have implications for the SA.

4.2 A detailed review of the PPPs can be found in Technical Document 1 Appendix 2. For each there is short summary of the key objectives and any specific indicators or targets that the PPP sets out. There is also a review of what the implications of the PPP are for the SA.

The review of PPPs has been ongoing with additional documents added as a result of consultation on the Scoping Report and any particularly significant or relevant PPPs that have been published since the original Scoping Report and Preferred Options SA work was undertaken. New PPPs reviewed since the PO Report are shown in Technical Document 4 Appendix 15.

4.3 The table is not exhaustive. Every effort has been made to assess all relevant PPPs but the table can be easily updated to add any that have been inadvertently missed out or which might have been misinterpreted. Out of the PPP review, the following issues/requirements have been identified which need to be considered by the SA and whilst producing the Core Strategy. These issues/requirements will inform the development of the SA framework, introduced in Chapter 7.

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<tr>
<th>Table 4.1 Sustainability issues identified from PPP review</th>
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Promote ‘destination’ appeal
Recognise and promote culture
Use innovative ideas and good design
Protect and enhance wildlife habitats and biodiversity
Protect and enhance landscape character
Consider opportunities to tackle deprivation amongst existing communities and provide for existing residents
Consider the benefits of local food production
5 Task A2 Baseline Data

5.1 The SEA Directive requires information on the:

> relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme’ and ‘the environmental characteristics of the areas likely to be significantly effected’ (Annex I (b), (c)).

5.2 Establishing the baseline is an important element of understanding what specific issues the Borough is facing. As well as this, the baseline can also be used to develop indicators that allow the sustainability effects of implementing the Core Strategy to be monitored into the future.

5.3 Baseline data can be found in Technical Document 1 Appendix 3. The statistics collected as far as possible relate to the whole Borough, as the plan will have implications for the whole of the Council’s administrative area. Where this is not the case, it has been stated in the table. For each statistic, where possible, comparison data has been given for South East England, England and also the adjoining local authorities. This helps to place the Milton Keynes situation in a wider context.

5.4 Collection of this data is an ongoing process and when new statistics become available they will be added to the table. This data will be updated annually, where possible, to allow the effects of the plan to be monitored.

5.5 The data sources and the statistics in the table have both been colour coded to show their quality and trend situation respectively. This process has helped to identify particular areas of concern across the Borough. This chapter provides a summary of the key findings drawn from the baseline, which the preparation of the Core Strategy will have to take into account. It also sets out any changes to the characteristics of the area that are likely to change without implementation of the plan.

The data table in Technical Document 1 Appendix 3 and the summary in the following sections have, where possible, been updated since the PO Report was published to reflect the most up-to-date baseline situation.

Social features

Population

5.6 Historically Milton Keynes has one of the fastest growing populations in the country due to its role as a New Town and more recently as a designated growth area. At designation in 1967 the population of the Borough was 60,000. The official population at the 2001 Census was 207,057, which has risen to 228,400 by mid 2007. Through growth proposals the population is estimated to reach 266,870 by 2015. The average age at the 2001 Census was 35.2. Estimates of the population growth suggest that there will be significant increases in the 0-4 and 60+ age groups as a result of the growth proposals (MKC Population Bulletin).

5.7 Compared to the surrounding authorities, Milton Keynes’ population is more ethnically diverse. At the 2001 Census the mix was 90.7% white, 2.8% mixed race, 3.6% Asian/Asian British, 2.4% Black/Black British and 1.4% Chinese/other. Figures on the ethnicity of the school age population in Milton Keynes show that 21.3% of school children are from minority ethnic groups, suggesting that the ethnic mix of Milton Keynes is changing and will continue to change in the future.
5.8 Milton Keynes’ Index of Multiple Deprivation 2007 (IMD) rank of 212 out of 354 compares poorly to surrounding authorities. This is a slight improvement from the 2004 rank of 204. Despite not appearing to be ranked particularly poorly nationally, analysis at the ward level shows that there are major disparities between Milton Keynes’ best performing areas and its worst. There are two wards in the 30% most deprived wards nationally (Woughton and Eaton Manor) which account for 10,223 and 8,085 residents respectively. On a smaller scale there are 15 Lower Super Output Areas (LSOAs) that fall within the most 20% deprived LSOAs nationally. These can be seen in red on Figure 1 ‘Deprivation Levels in Milton Keynes’.

5.9 The Milton Keynes Social Atlas annually monitors the performance of Milton Keynes’ estates against a set of key criteria. The Atlas reports on the rank of estates compared to previous years. The report indicates that there are certain estates that have continually poor achievement against the indicators, but there are also others that appear to be worsening, suggesting in the future they will have similar problems to those already recognised to be struggling.
Crime

5.10 Government Floor Target figures show that the overall crime rate in Milton Keynes (63.7 per 1000 population) is higher than that in neighbouring authorities and also the regional average. There also appears to be an issue with violent crime, with a figure of 29.1 per 1000 (BVPI 127a, 2007/8) being above local and national averages and an increase on previous figures.
5. Task A2 Baseline Data

Education

5.11 In 2007, in terms of qualifications, 28.2% of Milton Keynes’ work aged population have a level 4 qualification or above. This is below the average for the South East region (30.8%) but rising. Milton Keynes also has a slightly higher level of population with no qualifications (13.4%) compared to the rest of the South East.

5.12 18.9% of residents in Milton Keynes have a level 2 qualification (5 A*-C grade GCSEs or equivalent). This is above the national and regional averages but slightly lower than the level of neighbouring authorities.

Housing

5.13 The 2001 census showed that there were 86,584 households in Milton Keynes. Annual Population Survey (2007/8) figures show this has risen to 94,600. As part of sub regional growth proposals the figure is set to rise by just over 40,000 by 2026.

5.14 The Annual Monitoring Report shows that in 2005, 42% of housing completions were affordable units. This has subsequently dropped to 29% for 2006/7 and 2007/8. However, this is in line with the Adopted Local Plan target of 30%.

5.15 Neighbourhood Statistics show that for the period between 2001 and 2004 the average house sale price was £171,595. This compares well to surrounding authorities, all of which had higher average sale prices than Milton Keynes. Research by the Joseph Rowntree Foundation shows that in 2003, relative to average earnings, affordability compared well with local and regional averages with an affordability ration of 2.89. The most recent data suggest that house prices peaked in 2008 and subsequently fell by approximately 20%.

Transport

5.16 Figures from the 2001 Census shows that car ownership patterns follow closely the average for the South East. Compared to national figures, car ownership is high with only 19.2% of households not owning at least 1 car (compared to 26.8% nationally). Locally, Milton Keynes’ surrounding authorities have higher levels of car ownership with Aylesbury Vale (14%), Mid Bedfordshire (13.1%) and South Bedfordshire (16.9%) all having less households without access to at least 1 car.

5.17 However, as can be seen on Figure 2 ‘Car Ownership Patterns in Milton Keynes’, in 2001 car ownership across the city was not uniform, with areas such as Woughton and Eaton Manor only having around two thirds car ownership, compared to over 90% in areas such as Emerson Valley and Sherington. Netherfield shows the lowest car ownership rate at 57% (Draft MK Transport Strategy Review, 2007).

5.18 The number of bus journeys taken in Milton Keynes rose by 30.3% between 2004/05 and 2007/08 to a total of 9.15 million (LTP2 Delivery Report). Despite the large increase in patronage in recent years bus usage in Milton Keynes is low.

5.19 The percentage of the rural population within 13 minutes walk of a bus stop has remained constant during the period of the first Local Transport Plan (LTP1 Delivery Report).

5.20 According to the 2001 Census, the car is the dominant mode of transport to work (62.9%), which is higher than all of the neighbouring authorities and above the national and regional averages. This is despite the 2001 Census showing that of the four authorities included in the baseline, Milton Keynes has the shortest average journey to work (at 14.1km).
5.21 Milton Keynes has three stations on the West Coast Mainline, a significant resource for the Borough. Milton Keynes Central is the dominant station with 5 times the passenger numbers of Bletchley and 12 times that of Wolverton (Draft MK Transport Strategy Review, 2007). It can be seen from survey work that 24% of the passengers using Central Milton Keynes Station travel to the station from outside Milton Keynes, highlighting its important sub-regional function. Statistics for Bletchley and Wolverton suggest that these stations perform a more local function with 31% (Bletchley) and 38% (Wolverton) of users arriving at the station via foot and only 15% (Bletchley) and 14% (Wolverton) arriving from outside the towns (Draft MK Transport Strategy Review, 2007).

Human Health

5.22 Life expectancy in Milton Keynes (77.4 male and 80.9 female) is lower than in surrounding authorities as well as the national and regional average (Government Floor Targets, 2003). The Borough also sees a big disparity (8.4 years) between the area with the longest life expectancy (Middleton) and the shortest (Woughton). In line with national figures, life expectancy of Milton Keynes residents has been increasing.

5.23 The most common causes of death are the same as those nationally, namely circulatory disease (27%), cancers (22%) and heart disease (15%). The standard mortality ratio of 103 is relatively high compared to the national figure of 100, the South East average of 93 and those of neighbouring authorities.
5. Task A2 Baseline Data

Environmental features

Brownfield Development

5.24 The Government target of having 60% of all new homes built on previously developed land is not met in Milton Keynes where 40% of homes are built on brownfield sites (AMR, 2007/8). This figure can mainly be attributed to Milton Keynes' development as a New Town where the availability of brownfield opportunities is extremely limited.

5.25 The funding available to Milton Keynes to support growth has an important role to play in bringing forward brownfield sites for development, such as Wolverton Park. This type of approach could help increase levels of brownfield development in the future. Since 2000 the level of brownfield development has increased from 10.7% in 2001/02, indicating that brownfield development is becoming more prevalent in Milton Keynes.

Landscape Character and Biodiversity

5.26 The Natural England Landscape Character Map of England shows Milton Keynes sitting in the Bedfordshire and Cambridgeshire Claylands character area. This area is characterised by gently undulating topography and plateau areas, divided by broad shallow valleys. The area immediately to the south east of Milton Keynes is the Greensand Ridge Character area, which is rich in terms of the quality of the wildlife habitat and plant and animal life that is found there. It is home to uncommon habitats such as lowland heath, acid grassland and wetland.

5.27 The other key environmental constraints within the borough are shown on Figure 3 'Selected Environmental Constraints in Milton Keynes Borough'. These include two Areas of Attractive Landscape, two Sites of Special Scientific Interest (plus others on the periphery of the Borough), one Local Nature Reserve (the Blue Lagoon in Bletchley), 16 Milton Keynes Wildlife Site (locally designated to an agreed set of criteria), and the canal corridor running north/south through the city. There are also approximately 200 Local Wildlife Sites in the Borough (BMERC). The planning of Milton Keynes has provided structured open space in the form of linear parks, which provide high quality, accessible greenspace that benefits both wildlife and local residents.

5.28 There are also other significant wildlife corridors in the Borough including 712 hectares of railway corridor, 988 hectares of road corridor and 362 hectares of woodland corridor (BMERC).

5.29 There is 106 hectares of Regionally Important Geological and Geomorphological Sites (RIGS) within the Borough (BMERC).

5.30 Indications are that the number of BAP Priority Species currently stands at 18 (BMERC), a figure which has dropped considerably over the last 50-100 years.

5.31 Natural England's national database of BAP Priority Habitats shows that there are 308 hectares of Floodplain Grazing Marsh, 55 hectares of Lowland Beach and Yew Woodland, 32 hectares of Lowland Heathland, 46 hectares of Lowland Mixed Deciduous Woodland and 561 hectares of Wet Woodland. This can be seen in Figure 4 'Distribution of BAP Priority Habitats within the Borough'.

5.32 100% of the 27.6 hectares of SSSI in the Borough is found to be in favourable condition (Audit Commission). This compares favourably to levels in neighbouring authorities where Aylesbury Vale (34%), Mid Bedfordshire (85%) and South Bedfordshire (49%) each have a smaller proportion of SSSI in a favourable condition (although they do have considerably larger areas of SSSI).

5.33 Also shown on Figure 3 'Selected Environmental Constraints in Milton Keynes Borough' are the Borough's 27 conservation areas, the 50 Scheduled Ancient Monuments, and the three areas of historic parkland (Tyringham, Gayhurst and Chicheley). Currently there are no grade 1 or 2* listed buildings in the Borough on the English Heritage 'at risk' register, although the Conservation and Archaeology team are considering the potential for a local 'at risk' list.
5.34 Milton Keynes falls within the West Anglian Plain Natural Area, as defined by Natural England. Farmed (arable and agriculturally improved pasture) land is a key habitat, which comprises a major proportion of the natural area. Features such as hedgerows, mature trees, ponds and small watercourses are important features that support a wide range of species, including some that have seen a massive recent decline, such as the skylark and grey partridge.

**Figure 3 Selected Environmental Constraints in Milton Keynes Borough**

Source: Milton Keynes Council, Information and Monitoring
5.35 There are currently no Air Quality Management Zones in Milton Keynes. All Air Quality management objectives for the area are being met, with the only issues being some locations adjacent to the M1, which suffer from high levels of nitrogen oxide, and the centre of Olney, where nitrogen oxide levels are currently being monitored.

5.36 In terms of air quality, records show an improvement between 2003 and 2004, although it was acknowledged that favourable weather conditions might have contributed to this.

5.37 The growth of the city could potentially see an increase in ‘noise hotspots’, as DEFRA guidance suggests that these are often associated with main road networks and isolated noise generators, such as railway lines, both of which have the chance of development as a result of growth.

Water quality and flooding

5.38 Milton Keynes has 15 lakes in the city and a further 15 in the rural areas, along with 11 miles of canal, which predominantly runs north to south through the city. The main watercourses are the Ouse (along with its tributaries) the Calverton and Loughton Brooks, the Tove, the Ouzel (and its tributaries) and Broughton Brook. Of these five are monitored by the Environment Agency. Based on the most recent assessment two locations showed very good biological quality, one showed good quality and a further two were fairly good. In terms of chemical quality two were good, two were fairly good and one fair. These figure compare well to the neighbouring areas, where water quality was also of a fairly high standard.

5.39 An audit commission assessment of the overall biological quality of river length shows that 87.68% of water quality is classed as good. This is a significantly higher figure than any of the neighbouring authorities and the national average of 53.61%.
5.40 Milton Keynes covers a large part of the upper stretches of the Great River Ouse catchment area, including the River Ouzel. The floodplain areas of the river are mainly covered by wetland habitats designed to limit the impact of any flood. The areas of the river not protected by flood defences have at least a 1% chance of flooding each year, with parts also liable to a major flood, which has a 0.1% chance of occurring each year. Figure 5 'Zone 2 & 3 Floodplain in Milton Keynes Borough' shows the flood map of the urban area.

5.41 The majority of water for Milton Keynes is piped from Grafton Water in Cambridgeshire, with a limited amount coming from private water supplies, which are monitored for quality by the Council. No water supply issues have been raised to date.

Figure 5 Zone 2 & 3 Floodplain in Milton Keynes Borough

Climate change

5.42 Industrial and commercial activity is currently the biggest sources of carbon dioxide emissions in Milton Keynes (45%, Defra). The average of 8.1 tonnes per capita (2006) is just below the average for the South East region. This has dropped from 8.6 tonnes in 2003.

5.43 The Local Plan, adopted in December 2005 has a Design Policy (D4) setting out the requirements expected from new developments in terms of sustainable construction standards. This applies to all residential developments over 5 dwellings and other development over 1000sqm. One major requirement is for new developments to improve energy efficiency by 25% over building regulations.

Energy Efficiency

5.44 In terms of energy efficiency the average SAP rating of all local authority dwellings (BVPI 63, 2005) shows that despite improving, Milton Keynes still falls below the national average (MK 58 out of 100, England 64).
5.45 In response to the Home Energy Conservation Act 1995, Milton Keynes has shown a marked improvement in the efficiency of its Council housing stock since 1996. The percentage improvement of 21% is more than neighbouring authorities and is more than the national average of 16.7%.

Waste Management

5.46 Milton Keynes (24.4%) has a higher level of household recycling than most neighbouring authorities (BVPI82a, 2006/7). This level is up 5.3% on 2004/5 figures and is also above the national average of 21.9%.

5.47 However, Milton Keynes also still landfills a significant level of waste (63.6%), which is high compared to the national average of 54.6% (BVPI, 82d, 2004/5). This is a fall of 9.4% since 2004/5. Given that Milton Keynes’ only landfill site is reaching maximum annual capacity and that changes in regulation will encourage increased recycling, it can be expected in the future that the amount of waste being sent to landfill will decline.

5.48 The high level of landfill could partly be attributed to the relatively high level of waste collected per person in Milton Keynes (536kg per head). This is 103kg more per person than the national average and is a 32.1kg increase on the level of waste collected in 2001/2. This could be attributed to the continued decrease in household size, with more single person households producing more waste; the trend is likely to continue in the future.

5.49 The cost of collection per head in MK (£70.53) is also significantly higher than neighbouring authorities and the national average (£53.8) (BVPI 86). This is a rise of £29.83 per head since 2001/2.

Economic Features

Employment

5.50 Compared to its neighbours Milton Keynes has a relatively high level of unemployment (2.8%, November 2008). This level has risen from 1.6% in April 2000. This trend is broadly inline with the pattern of the national economy.

5.51 65.5% of Milton Keynes’ population are of working age, which is above national, regional and local averages. 82.4% of the working age population are economically active, which although above national and regional averages, is below the level of neighbouring authorities.

Benefits

5.52 There are 2.6% of the work age population claiming jobseekers allowance, a comparatively high figure for the South East region and over double that of two of Milton Keynes’ neighbouring authorities.

Productivity and pay

5.53 Average gross full time annual pay in Milton Keynes stood at £25,456 per person, over £2,000 less than the South East average.

5.54 Productivity in the city is good with a GVA of £22,139 per capita comparing well to neighbouring authorities.

5.55 Milton Keynes also proved to be a good location for business start-ups/relocation in 2004 with 49 (per 10,000 population) new VAT registered businesses, a figure which compares well to local, national and regional averages.
6 Task A3 Identifying key sustainability issues and trends

6.1 The need to identify the key sustainability issues in the Borough emerges from a requirement of the SEA Directive, which states:

> ‘any existing environmental problems which are relevant to the plan…including, in particular, those relating to any areas of particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC’ (Annex I (d))

6.2 Identifying these issues means that the Core Strategy, within reason given its scope and objectives, can pick-up these issues and make a positive contribution to improving and enhancing the social, environmental and economic characteristics of the Borough.

Methodology

6.3 A number of sources have been used to identify the sustainability issues in Milton Keynes. These are:

- Analysis of the collected baseline data;
- The earlier review of plans, programmes, policies and sustainability objectives and the sustainability appraisal of the Growth Strategy; and
- Existing knowledge of Council Officers.

6.4 The review includes both positive and negative issues relating to social, environmental and economic characteristics across the Borough. The process is iterative and will continue to evolve as and when more baseline information is sourced and/or stakeholders influence the process. Where appropriate, suggestions have been made to general ways that the issues could be addressed.

Social Issues and trends

6.5 The rate and level of population growth - Milton Keynes is one of the Government’s growth areas and as such is set to expand by 49,000 homes up to 2026. This will provide challenges in terms of providing facilities for residents and visitors and ensuring that existing areas are not neglected at the expense of new expansion, creating a ‘two speed city’.

6.6 It will also provide challenges in terms of protecting the environmental characteristics of the area from expansion of the urban area and the potential increase in activity that will result from an increased population. Consideration also needs to be given to the impact population growth has shown to put on transport and waste management systems.

6.7 Growth is also forecast in the areas around the Borough, which may impact on Milton Keynes as its potential role as a regional centre develops further, resulting in visitors making more journeys into the city from surrounding areas.

6.8 Old and young population - Statistics show that in the future there will be an increased proportion of residents aged 0 to 4 and over 60. This will have implications for the type of facility and accommodation required by local residents. It will also have implications for how people move around the city.

6.9 Changes in ethnic composition - Milton Keynes is becoming a more diverse city. Figures indicate that 21.3% of school age population are from ethnic minority communities compared to 9.3% of the current total population. This change in population structure will result in changing requirements for facilities and living accommodation that needs to be taken into consideration.
6.10 Pockets of deprivation - Milton Keynes is ranked 204 out of 354 in the Index of Multiple Deprivation 2004 (1 being the most deprived). It is economically successful and is fairly prosperous (as will be shown later) but the city contains pockets of deprivation, which have a quality of life someway below the average for the city as a whole. Issues, such as a low car ownership, characterise these areas. Consideration needs to be given as to how development can help reduce these inequalities within the city and bring the deprived areas up towards the Milton Keynes average.

6.11 Levels of crime - Compared to it neighbouring authorities Milton Keynes has high levels of general and violent crime in public spaces. The levels of crime are also higher than national and regional levels.

6.12 Life expectancy and mortality rates - As with the national and regional averages and neighbouring authorities, life expectancy has been increasing in Milton Keynes over the last 5 years. However Milton Keynes’ life expectancy (at 76.2 for males and 80.2 for females) is below the national average, regional and local averages.

6.13 Despite having 72.5% of the population with ‘generally good health’ (Census, 2001), Milton Keynes has a high standard mortality ratio of 105 (compared to 100 for England as a whole and 93 for the South East). This suggests that providing opportunities to improve health and increase recreational activity could help to encourage healthier lifestyles.

6.14 Educational attainment - Milton Keynes has a high level of residents with no qualifications (11.2%) and high numbers of level 4 qualified residents, which despite being above the national average, is below the average for the South East. With the ambition of building a knowledge-based economy, these skill deficiencies will need to be addressed and opportunities to create a step change in educational attainment supported.

6.15 It is an aspiration of Milton Keynes to be home to a high-class university. This would enable Milton Keynes to retain its talented young population and attract a new type of resident of the city.

Environmental issues and trends

6.16 Use of brownfield land - Currently 40% of new housing development taking place on previously developed land. This is well below the national target of 60%. This can be partly attributed to Milton Keynes’ development as a New Town, which by definition means the creation of new urban spaces on greenfield sites is required. In the future, as original parts of the city get older opportunities for brownfield development may become more prevalent.

6.17 Protection of landscape character and wildlife habitats - The creation of the New Town has resulted in open countryside being used for new development, but the protection of designated sites has been integral to the structure of the city. Within the Borough a number of new wildlife habitats have been created, including the linear and country parks, which have helped to compensate for the loss of land to the new town and provided quality greenspace for the residents of the new town.

6.18 There are a number of important designated sites in the areas surrounding Milton Keynes Borough, which will play an important part in shaping any future expansion of the city.

6.19 There will need to be co-ordination between authorities to ensure that sites are suitably protected. It maybe appropriate for the Core Strategy to identify the critical level of natural capital that should not be lost to further social and economic objectives.

6.20 Protection of cultural character and heritage - The development of Milton Keynes has already seen several small villages incorporated within the boundary of the New Town. Those with particular historic importance are covered by conservation areas, which help to protect their character and setting.
6.21 The growth of Milton Keynes may put increased pressure on rural parts of the Borough to contribute towards achieving targets, meaning consideration will need to be given as to how the character and setting of architecturally and culturally important areas, and those areas which are have a predominantly rural character, can be protected.

6.22 As with protection of landscape character, the surrounding Boroughs of Milton Keynes contain large areas of unspoilt historic landscape, containing many conservation areas and important archaeological sites. Any expansion plans will need to give consideration to such areas.

6.23 Increasing levels of waste - the level of waste collected per head in Milton Keynes has increased by 25.6kg since 2001/02 to 529.5kg per head in 2004/05. This is significantly above both national and local averages. Milton Keynes also has an issue with 73.2% of its waste going to landfill (compared to the 20.3 nationally). Under new waste legislation the level of waste going to landfill will have to be reduced to help the Council to avoid significant financial penalties. It will therefore be important that the plan enables these requirements to be met.

6.24 Recycling levels - Recycling in Milton Keynes is above the local and national averages and is increasing year on year. In 2004/05 18.1% of household waste was recycled (15.2% nationally) with a further 8.4% composted. The level of recycling is up 7.5% on 2001/02 levels. This is something that can be supported further still with new technologies and practices emerging.

6.25 Flood risk and water - the main source of flood risk in Milton Keynes is from the River Ouse. The majority of this area has adequate protection against a 1 in 100 year flood but it is acknowledged that changes in climate may result in the floodplain boundary being expanded. Areas in surrounding boroughs have suffered from localised flooding in the past, partly as a result of areas of inadequate flood protection. The continued consideration of flood treatment will be integral to ensuring the protection of new development.

6.26 The chemical and biological water quality in Milton Keynes, although generally of a reasonably high quality and showing an improvement over time, has varied in condition over the period it has been monitored. The one area where water quality has fallen is Broughton Brook, which is an area associated with expansion of the city. This suggests that consideration needs to be given to the impact of development on water quality.

6.27 Anglian Water pipes Milton Keynes’ water into the area from Grafham Water in Cambridgeshire. An increase in population will potentially put pressure on this resource, particularly in times of relative drought. Consideration needs to be given as to whether the current arrangement of piping in water into Milton Keynes is sufficient to support the anticipated increase in population.

6.28 Air pollution - currently there are no Air Quality Management Zones in Milton Keynes. However, it is acknowledged that Milton Keynes is built around the use of the car and increased growth in the population could lead to increased car usage and associated congestion and air pollution. Encouraging the use of sustainable modes of transport over the car could prevent much of this.

6.29 Climate Change - Commercial and industrial activities are the main source of CO₂ emissions in Milton Keynes. There is a need to help meet national and international targets for the reduction of CO₂ emissions by ensuring that the main sources of emissions are targeted for improvements. The Government currently see CO₂ emissions as a particularly important policy area and it is likely that more emphasis will be placed on the need to reduce emissions over the coming years.

6.30 Policy D4 in the Local Plan requires all new development over a certain threshold meets standards of sustainable construction. The acceptance of this policy has taken hold, with applicants being required prove how proposals meet these standards now being an integral part of the application process.

6.31 Transport - Milton Keynes has traditionally been built around the use of the car as the main mode of transport. Congestion and associated pollution now make the car one of the most unsustainable modes of transport. On the back of this, Milton Keynes has a high level of car ownership and a large number of people use a car to get
6. Task A3 Identifying key sustainability issues and trends

to and from work. However, as was mentioned earlier, some areas of Milton Keynes are characterised by low car ownership, meaning residents in these areas are excluded from day to day activities. The level of bus usage has increased 3.76% since 2001/2 but the population has also increased over this period.

6.32 With junction improvements on major routes in and around ongoing and planned, to cater for new development, it is likely that use of the car will remain strong. Predictions using the Milton Keynes Multi-Modal Transport Model suggest that major gateways will see a 22% increase in traffic coming into the city during the morning rush hour and a 32% increase in traffic leaving during the same period by 2031, highlighting the ongoing pressures that growth will place on the highway network. Considering this and other factors, the Draft Milton Keynes Transport Strategy Review suggests that to avoid major congestion problems, bus passenger numbers will have to increase 5% per year for the next 25 years, else the existing car based approach will become increasingly untenable and unsustainable.

6.33 Improvements are being made to the north/south and east/west transport routes to support the use of public transport and this is an issue that needs to be supported if a modal shift is to be achieved.

Economic issues and trends

6.34 Economic growth - Milton Keynes has shown that it can sustain a high level of economic growth with a steady rise in GVA per capita per head since 2002 to £22,139 in 2005. This is one of the highest GVA per capita figures in the country and shows that Milton Keynes is steadily increasing its productivity.

6.35 Milton Keynes saw a 1% rise in the gross weekly pay of full time workers to an average of £457 per person between 2004 and 2005. This is still 2% above the national average but is below the average for the South East, which saw a higher increase in weekly wages over the same period.

6.36 Milton Keynes had a high level of VAT registrations (55 per 1000 adult population) in 2005 when compared to national, local and regional figures. The Borough also shows a high percentage of VAT registered businesses (12.6%) indicating it is a hotbed for business development.

6.37 Milton Keynes’ strategic location, within the Oxford to Cambridge arc and in close proximity to London, will continue to make it an attractive location for businesses, both new and relocating, in the future.

6.38 Housing affordability - Over recent years, as with most areas in the country, house prices have shown a steady increase in Milton Keynes. However, prices in Milton Keynes still compare relatively favourably with prices in neighbouring authorities, with an overall average price of £171, 595 compared to £221,652 in Aylesbury Vale. The Housing Affordability Ratio for Milton Keynes of 2.89 also compares favourably with neighbouring areas suggesting in real terms housing in Milton Keynes is more affordable than other local areas.

6.39 The percentage of affordable housing completions in the borough increased from 33% in 2004/5 to 42% in 2005/6 in line with this increase in house prices.

This stage of the SA was prepared before the recession. Since then property prices have fallen by approximately 20% and unemployment has risen. Updated baseline data is contained within Technical Document 1 Appendix 3. Although the economic circumstances have changed on which the initial stages of the plan were based upon, Core Strategies are required to be flexible to new events and different circumstances.

Limitations of the information and assumptions made

6.40 There is a vast amount of data available that could be accommodated in the baseline. Efforts have been made to source the most appropriate data has been included in the baseline. However, there are certain limitations that should be noted.
In certain cases, data may be several years old. This is particularly the case with Census data, which was last collected in 2001. Despite being six years old, the Census data gives a valuable understanding of the social makeup of the Borough and its inclusion is felt to be important as it records information that is not available through other sources.

Another limitation is continuity of data. In some cases new data sources do not allow for trends to be established, with just a ‘snap shot’ of the current situation available. Where this is the case, it has been assumed that these snap shots are still valuable and they have been included in the baseline.

Finally, there are limitations on the availability of mapped data. It has been possible to map some of the environmental and social data through the Council’s GIS system, however, there is other data for the Borough that the Council does not have the ability to map.
6. Task A3 Identifying key sustainability issues and trends
7 Task A4 Developing the SA Framework

7.1 The purpose of the SA framework is to provide a structure by which sustainability effects can be described, analysed and compared. Preparation of the framework involves the production of a series of sustainability objectives, against which the success of the strategy can be measured, and a series of identified indicators, which can be used to monitor the implementation of the strategy.

7.2 This stage also involves analysing the potential internal compatibility of the draft sustainability objectives, identifying any potential areas of conflict or consensus. Finding any potential conflicts at this stage is particularly important to enable the potentially damaging effects of pursuing a sustainability objective to be assessed and also to enable possible ways to mitigate against or overcome these problems to be considered.

Objectives

7.3 A set of sustainability objectives and indicators has been developed to test the sustainability of the plan options. These have been based on the sustainability issues, identified in the previous two sections, and take their form from the Integrated Regional Framework (IRF), established to monitor the sustainability of regional policy.

7.4 Alongside the objectives are a series of sub-objectives, or targets, which give an indication of what each policy needs to achieve if it is going to meet the objective.

7.5 In line with guidance, the number of objectives has been limited to 20, to fall between the manageable number of 12-25 suggested in guidance. The objectives are listed in Table 7.1 'Sustainability Objective with SEA topic'. This table also shows how the objectives cover the 12 environmental topics required by the SEA directive. The full framework can be seen in Technical Document 1 Appendix 4.

7.6 It should be noted that consideration was given to the objectives developed for the Growth Study as well to ensure a level of continuity in the appraisal process. The growth strategy identified 22 sustainability objectives and it is considered that the 20 objectives identified in the SA Framework below are generally compatible.

<table>
<thead>
<tr>
<th>Number</th>
<th>Sustainability Objective</th>
<th>SEA topic</th>
</tr>
</thead>
<tbody>
<tr>
<td>SOCIAL</td>
<td></td>
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</tr>
<tr>
<td>1</td>
<td>Ensure that everyone has the opportunity to live in an affordable, sustainably constructed, decent home</td>
<td>Population, material assets</td>
</tr>
<tr>
<td>2</td>
<td>Improve the health and quality of life of residents, reducing inequalities in health</td>
<td>Human health</td>
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<tr>
<td>3</td>
<td>Reduce poverty and social exclusion, closing the gap between Milton Keynes’ most deprived areas and the average.</td>
<td>Population</td>
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<tr>
<td>4</td>
<td>Raise educational achievement and skills acquisition to allow everyone to find and stay in work</td>
<td>Population</td>
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<tr>
<td>5</td>
<td>Reduce crime levels and fear of crime and create vibrant communities</td>
<td>Population</td>
</tr>
<tr>
<td>6</td>
<td>Improve accessibility to services and facilities</td>
<td>Human health, climatic factors</td>
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<tr>
<td>7</td>
<td>Provide facilities and services for all sections of the community</td>
<td>Population</td>
</tr>
</tbody>
</table>

ENVIRONMENTAL
### Sustainability Objectives

<table>
<thead>
<tr>
<th>Number</th>
<th>Sustainability Objective</th>
<th>SEA topic</th>
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<tbody>
<tr>
<td>8</td>
<td>Encourage urban renaissance and improve efficiency of land use through an increase in the use of brownfield sites</td>
<td>Landscape, soil, flora and fauna</td>
</tr>
<tr>
<td>9</td>
<td>Continue to maintain and improve local air quality and limit noise pollution</td>
<td>Air</td>
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<tr>
<td>10</td>
<td>Tackle climate change by reducing the emissions of greenhouse gases from domestic and industrial sources</td>
<td>Climatic factors</td>
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<tr>
<td>11</td>
<td>Reduce road congestion and support a modal shift towards sustainable modes of transport</td>
<td>Air, climatic factors</td>
</tr>
<tr>
<td>12</td>
<td>To conserve and enhance Milton Keynes’ biodiversity</td>
<td>Biodiversity, flora and fauna</td>
</tr>
<tr>
<td>13</td>
<td>Conserve and enhance the Borough’s cultural heritage</td>
<td>Cultural heritage</td>
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<tr>
<td>14</td>
<td>To maintain and improve the Borough’s water quality and reduce the risk of flooding</td>
<td>Water</td>
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<tr>
<td>15</td>
<td>Reduce the generation of waste and support sustainable waste and soil management</td>
<td>Soil, landscape</td>
</tr>
<tr>
<td>16</td>
<td>Increase energy efficiency and encourage the use of renewable sources of energy</td>
<td>Climatic factors</td>
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</table>

### ECONOMIC

<table>
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<th>Number</th>
<th>Sustainability Objective</th>
<th>SEA topic</th>
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</thead>
<tbody>
<tr>
<td>17</td>
<td>Ensure high and stable levels of employment, allowing all residents to benefit from economic growth</td>
<td>Population, material assets</td>
</tr>
<tr>
<td>18</td>
<td>Sustain economic growth and competitiveness across the region</td>
<td>Population</td>
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<tr>
<td>19</td>
<td>Improve the vitality and viability of town centres</td>
<td>Population</td>
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<tr>
<td>20</td>
<td>Encourage creation of new businesses and support development of a knowledge based economy</td>
<td>Population</td>
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</tbody>
</table>

#### Indicators

7.7 To sit alongside the objectives are a series of indicators, which allow the sustainability effects of the plan to be measured. The indicators, where possible, have been selected to be comparable against national data. Where this has not been possible other data sources have been selected that relate to issues specific to Milton Keynes. Where possible, they have also been selected from data sources that are updated regularly and that are easily sourced, to allow for ease of monitoring. In some cases, new indicators have had to be developed to monitor the sustainability impact of the strategy once it is adopted. The responsibility for sources and collecting the data can be seen in the proposals for monitoring section (Chapter 12).

7.8 The indicators, and the objectives above, have been amended to take into account the responses to the Scoping report. The indicators can be seen in the full framework in Technical Document 1 Appendix 4.

#### Internal compatibility

7.9 An internal compatibility matrix of the objectives can be found in Table 7.2 ‘Sustainability objectives internal compatibility matrix’. Identifying these conflicts now enables decisions made on the Core Strategy to be fully informed of the sustainability implications that could occur. It also provides an early opportunity for mitigation.
or alternatives to be considered and for priorities to be set as to the most important objectives. Potential conflicts are numbered with relevant explanations in Technical Document 2 Appendix 5. Ticks show areas of potential compatibility between objectives.

Table 7.2 Sustainability objectives internal compatibility matrix

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7. Task A4 Developing the SA Framework
8 Task B1 Testing the SA objectives against the Core Strategy objectives

8.1 It is important to ensure that the overall objectives of the Core Strategy are in accordance with the principles of sustainable development being promoted through the SA process. The two sets of objectives were tested for their compatibility as part of the initial process of developing the framework. This test can be seen in the matrix below.

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Areas of conflict

8.2 It can be seen from the matrix that there are certain areas of conflict between the two sets of objectives (red squares). These areas of conflict are discussed in the table in Technical Document 2 Appendix 6. In general terms it can be seen that the broad areas of conflict are between the need to provide for improved quality of living alongside the need for the sustainable economic growth of the Borough. There are also general conflicts between the need for growth and development and environmental sustainability objectives. There is also concern about how delivery of some of the Strategy objectives will affect the attractiveness and functioning of the city area.
As a result of comments received during the consultation on the Preferred Options Document and subsequent meetings of the Local Development Framework Advisory Group the Core Strategy Objectives have substantially altered since the PO were published.

Due to the changes to the Core Strategy objectives it was considered appropriate to undertake Task B1 again in order to test the Pre-Submission set of Core Strategy objectives against the SA objectives and assess their compatibility. This is set out in 14 'Task D2 Appraising significant changes' and Technical Document 4 Appendix 17.
Task B2 Developing the Core Strategy options

Strategic options considered and how they were identified

9.1 The Council published an Issues and Options discussion paper for 3 months of public consultation in December 2006. This paper highlighted a range of issues currently facing Milton Keynes and a range of option areas that are being considered by the Council to address these issues.

9.2 The issues were identified through a review of various strategies, responses from previous periods of consultation and through the expert knowledge of Planning Officers. These were broken down into the broad themes:

- Environmental
- Social
- Economic

9.3 Under each theme, specific issues were identified along with ideas about how these issues could be addressed, to stimulate feedback from the public and key stakeholders around the issues. In most cases, the options were set out as discrete alternatives or as options that could be combined to form a preferred option. Options in this form have been taken forward directly into this appraisal.

9.4 In some cases the options were not specifically identified in the discussion paper. These ‘options’ acknowledged that there were certain issues that needed to be investigated, without specifically identifying what the alternative options were. To aid with the refinement of the options this sustainability appraisal has developed these options into realistic alternatives, using the knowledge of the specific issues facing Milton Keynes and in discussion with Planning Officers.

9.5 A list of the options considered can be seen in Technical Document 2 Appendix 7.

Growth Strategy Options

9.6 As already stated in section three, issues concerning direction and location of growth were not directly considered by the Issues and Options paper. These were subject to an individual consultation undertaken by MKP. Six alternatives were considered, which were prepared through a detailed analysis of constraints and opportunities within the Borough. These emerged from the consideration of three initial conceptual models and were based on five principles, or qualities, that the community felt were important to the future growth of the city. These were:

- **Renaissance of older areas of the city** - including regeneration of some district and local centres and comprehensive investment in poorer quality housing areas.
- **Environmental protection** - the need to safeguard valuable open space within the urban area and to protect the character of the countryside and villages from encroachment by new development.
- **Transport and access** - achieving accessibility for all and delivering more efficient and viable public transport.
- **New neighbourhoods** - where there are good local facilities within walking distance of home including health, schools, leisure and shops.
- **A strong, successful economy** - there is a need for the economic requirements of a growing Milton Keynes to be considered, which may include the reallocation of existing employment areas as well as the identification of new opportunities.
9. Task B2 Developing the Core Strategy options

9.7 The process for identifying these options is documented in the ‘Options for Growth Technical Report'(8). A further two realistic options were identified through the consultation process, making a total of 8 options for growth. These are summarised in table 9.1 below.

<table>
<thead>
<tr>
<th>Option</th>
<th>Urban capacity assumptions</th>
<th>Location of development</th>
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<tbody>
<tr>
<td>1</td>
<td>High</td>
<td>Development concentrated to the south west and south east</td>
</tr>
<tr>
<td>2</td>
<td>High</td>
<td>Development concentrated in the south and south east in the proposed east/west rail corridor</td>
</tr>
<tr>
<td>3</td>
<td>High</td>
<td>Development concentrated in the south west and west</td>
</tr>
<tr>
<td>4</td>
<td>Medium</td>
<td>Development concentrated in the south west, south and south east</td>
</tr>
<tr>
<td>5</td>
<td>Low</td>
<td>Development concentrated in the south west and south east</td>
</tr>
<tr>
<td>6</td>
<td>Low</td>
<td>Development concentrated in the south east and east of the M1</td>
</tr>
<tr>
<td>7</td>
<td>Low</td>
<td>Majority of development east of the M1</td>
</tr>
<tr>
<td>8</td>
<td>Medium</td>
<td>Development east of the M1, south, east and south east of the city.</td>
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10 Tasks B3 & B4 Predicting and evaluating the effects of the Core Strategy

Comparison of the social, environmental and economic effects of the options

a) Outcomes of the Growth Strategy options appraisal

10.1 A full overview of the appraisal of the Options presented by the Growth Strategy can be found in Chapter 9 of the Growth Strategy SA Report(9). Chapter 2 outlines the appraisal of the three conceptual Models initially considered.

10.2 Initially an appraisal of 3 conceptual models was undertaken to assess the impact of three very broad approaches:

1. Changing urban area;
2. Urban redevelopment/compact green field; and
3. Dispersed greenfield model

10.3 The report highlighted a couple of key findings:

1. Unless greenfield development successfully incorporates and establishes zero or very low carbon technologies and very highly efficient resource use from the outset, it will almost inevitably have the net effect, at least in the short term, of an increasing climate change burden and growing resource use ‘footprint’ and;

2. The less self-sufficient new greenfield developments are, in terms of both services, and more particularly employment, the more pronounced this effect will be, due to the net increase in kilometres travelled, while motorised road transport remains based on non-renewable carbon energy sources.

10.4 Following on from this, and wider consideration of the key issues and constraints affecting the Borough, six more detailed options were developed (as outlined in the previous section). This section provides an insight into the key findings of the appraisal, with the full overview in chapter 9 of the Growth Strategy SA report.

10.5 The appraisal showed that of the original six options put forward options 1 and 3 offered the most potential to realise the SA objectives, whilst options 5 and 6 offered the least. The main reason for this was that those options that incorporated higher urban capacities offered more opportunities to achieve the environmental and social objectives.

10.6 It was acknowledged that the most important aspect, in sustainability terms, was the potential of certain options to entrench car dependency by focusing development on key elements of road infrastructure. For Milton Keynes, this was felt to be most pronounced in the M1 corridor. Also, those options that lacked specific support for a modal shift failed to support the objective of moving towards a low carbon economy.

10.7 Options 1 to 4 all had overall positive sustainability scores, and generally scored well across economic and social objectives. The major difference was the spatial configuration of the proposed development. The relatively higher scores of options 1 and 3 were largely a function of differences in very broad site-specific characteristics between the areas.

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10.8 Options 5 and 6 had overall negative scores, primarily due to low urban capacity and high levels of greenfield expansion. Option 5 scored particularly badly due to the extent of development, into highly valued greenfield land in close proximity to a number of sensitive environmental assets.

10.9 Due to limited information, only tentative conclusions could be drawn about options 7 and 8. Option 7, although scoring negatively overall produced positive scores in the long term. The two key features influencing this being that there is no explicit provision for substantial urban capacity within the city and, the higher density, park setting neighbourhood model (which is one of the key elements of the option), together with strong explicit support for public transport, walking and cycling has the potential to deliver a high level of sustainability performance in the long term.

10.10 Option 8 performed broadly the same as option 4, with the only major difference being down to the growth area moving closer to the M1, which makes the option more similar to option 6, making it less sustainable in the long term due to the potential to encourage car usage for trips outside the Borough.

The overall conclusions were that:

- Options 1 and 3 offered the most potential to meet the SA objectives
- Options 5 and 6 performed worst against the SA objectives

Other key observations were that:

- Lack of firm medium-term strategic policies made differentiation of some aspects of the options problematic, with there being a need to rely on assumptions
- The lack of detailed site information made it difficult evaluate the spatial configuration elements of the SA rigorously
- The results are only tentative and more rigorous appraisal at later stages of the process could generate more detailed outputs to feed into the Strategy development.

10.11 At this stage an assessment of the compatibility of the SA objectives and the objectives of the Milton Keynes Community Strategy was undertaken. This highlighted very few potential conflicts and indicated that the SA framework provided a robust and comprehensive toll with which to test the sustainability of the MK Growth Strategy.

b) The Core Strategy Issues and Options

10.12 The initial appraisal looked at 69 strategic development options covering 25 issues, and broadly assessed to what degree they supported the objectives of sustainable development, set out in Chapter 7. The options in the paper focused on delivering the preferred spatial strategy in a sustainable manner. At this stage, the production of the Core Strategy was still at an early stage and the ‘options’ included in the papers were presented as a mixture of questions and statements to elicit consultees’ priorities for different measures, rather than as clearly discrete alternatives.

10.13 Many did not lend themselves easily to a comparison of their sustainability performance and the lack of detail made it difficult to attach a high level of certainty to the results. The broad options and policy choices at this stage meant that little quantitative analysis could be undertaken, meaning the SA at this stage was mainly qualitative, involving a degree of professional judgement and subjectivity. The conclusions provided an initial commentary on the general sustainability issues raised by the Issues and Options paper, including the key challenges and the sustainability strengths and weaknesses they raised.
In assessing the strategic options being put forward, regard was had to the impact of the options over and above that which would occur if the ‘status quo’ were to be retained. To minimise subjectivity, a series of assumptions, explaining what the options would need to achieve in order to meet sustainability objectives, were prepared along with a table of the correlations and relationships between factors. These were developed to be in-keeping with the assumptions made in the SA of the Growth Strategy to allow continuity in the appraisal process by providing a level of understanding of what meeting the objectives meant ‘on the ground’. These assumptions can be seen in Technical Document 2 Appendix 9.

The individual conclusions and recommendations provided by the interim appraisal are listed below. The full appraisal tables can be seen in Technical Document 2 Appendix 10.

Where possible, an opinion has been given as to the most sustainable alternative available. In some cases, all of the options are broadly sustainable. In cases like this, advice has been given as to in which circumstances certain options would be more suitable, which will help to guide decision makers as to which option is most suitable, given what the objectives are for the future of Milton Keynes. The findings outlined in Table 10.2 ‘Conclusions from the appraisal at the Issues and Options stage’ informed the selection and refinement of the preferred options.

In assessing the impacts of the options, the scoring system in Table 10.1 ‘Options Scoring System’ was used to indicate the effect of the option over retaining the ‘status quo’:

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<th>Symbol</th>
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<td>Very positive effect</td>
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<td>Positive effect</td>
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<td>Very negative effect</td>
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<td>?</td>
<td>Uncertain effect</td>
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Table 10.2 Conclusions from the appraisal at the Issues and Options stage

**Issue - Protection and enhancement of the biodiversity and geological resource of the Borough**
Both options are equally important – the existing nature conservation resource needs to be protected and enhanced, but the provision of new habitats should be an integral part of the development of new communities to ensure that the benefits that biodiversity can deliver are made available to all parts of the community.

**Issue - Protection and enhancement of cultural and historic assets- the areas of protection**
Both options are equally important – the existing cultural and historic resource needs to be protected and enhanced, but the protection of key aspects of the more modern 20th and 21st century city is equally important.

**Issue - Protection and enhancement of cultural and historic assets- the method of protection**
The implementation of design principles through policies and area based design statements together with seeking good design by raising quality makes a very positive contribution to a wide range of sustainability objectives.

**Issue - Maintenance and enhancement of green infrastructure and open spaces**
Option 1 brings positive benefits meeting a comprehensive range of social, economic and environmental objectives. These benefits could be further enhanced by Option 2 although there is a concern that increasing the level of open space provision would reduce the amount of land available for other vital uses and could be difficult to finance. Option 3 brings considerable opportunities and benefits for social and economic objectives. There are positives for the environmental factors although these are tempered by the potential loss of total quantum of open space which could adversely affect biodiversity and the contribution that green spaces can make to offset climate change effects. Option 4 is essential to maintain the attractiveness and usability of green space. Maintenance
regimes can adapt to reflect the particular needs of the local area and can have a positive effect on social objectives including community development and cohesion by encouraging the community to become involved in the work.

**Issue - Protection and enhancement of the Borough’s rural landscape - the method of protection**

Overall there is little difference between Options 1 and 2 – Option 1 protects the whole countryside but can find it difficult to turn away development appropriate to a rural area. Option 2 protects the most valuable and special character landscapes, but offers little in the way of general protection for the remainder of the rural areas. Option 3 therefore represents a more effective approach, providing protection and enhancement opportunities for the whole of the rural area whilst offering additional protection for the most attractive landscapes.

**Issue - Protection and enhancement of the Borough’s rural landscape - the areas of protection**

Overall there is little difference between Options 1 and 2 – both are very positive in terms of protecting the valued landscapes of the Borough. Option 1 protects a limited number of specific landscapes in the Borough. Option 2 would extend the protection to more areas of the countryside but could worsen some of the adverse effects – such as ensuring that everyone has access to an affordable, sustainably constructed, decent home.

**Issue - Protection and enhancement of the Borough’s rural landscape - protection from mineral extraction**

Option 2 provides more opportunities for minerals extraction to contribute positively to local growth and development. Strict restoration criteria would ensure that in the long term the landscape character would be maintained and in fact should have potential for it to be enhanced. Option 1 would have a more restricting impact on local development by reducing the local supply of minerals for the construction industry.

**Issue - Achieving energy efficiency**

There are only limited negative impacts associated with any of the options. These relate to potential viability problems/implications of implementing a renewable energy and/or zero carbon policy, particularly in the short to medium term.

Designing with nature achieves most of the sustainability objectives, particularly the environmental ones. However, scope for continued improvement is limited by the amount that can be done to alter the layout of places.

Zero carbon also met many of the environmental objectives. The only concerns were associated with deliverability and the implications of the potentially high costs involved in limiting short term brownfield development.

Offset payments also helped meet many of the sustainability objectives. They were particularly good as they provided increased opportunity to implement improvements within existing areas. However, potentially they would not have the direct benefits of high levels of renewable energy provision or zero carbon development.

High renewable energy requirements would help to achieve some of the sustainability objectives. However, there are question marks over its deliverability and its impact in terms of noise and visual intrusion. It does have the advantage of being an area of continued improvement, with advances expected to make the technology more viable and deliverable in the future.

**Issue - Creating healthy communities**

The first three of these options would help to achieve many of the social objectives, along with some limited success in achieving environmental objectives.

In sustainability terms, maintaining existing levels of open space provision and seeking higher levels helps to deliver similar objectives. Increased levels of open space would help to provide enhanced benefits in terms of potential for recreation and habitat provision. However, there were some concerns as to how seeking increased levels of open space could make brownfield sites less attractive development options. Another concern would be the overall impact on other aspects of development, such as housing density and how this could affect the functionality of communities. In both cases the importance of appropriate design standards for open spaces was seen as essential to the achievement of many of the social objectives.
In terms of the location of health facilities, providing facilities dispersed within communities performed far better against the objectives than focusing development on strategic locations. Providing facilities within communities would help to meet several social and environmental objectives (mainly due to increased accessibility). However, more focused facilities didn’t perform as well because they would potentially be less accessible to those without access to a car or with limited mobility. Focused facilities could however provide an opportunity to deliver efficient healthcare through co-location of complementary facilities.

**Issue - Encouraging the use of sustainable transport**

The options show very limited negative impacts, with only the potential for demand management to isolate some citizens highlighted through the appraisal.

Demand management will, however, also have many uncertain impacts, particularly when looking at the social sustainability objectives. Much would depend on the management techniques introduced and their ability to ensure that citizens from deprived communities are not priced out of participating in city life. Management measures would however help to achieve several of the environmental objectives by potentially making the car a less viable travel option (therefore cutting emissions etc…), and would also potentially make the city a more attractive investment location for businesses seeking an uncongested, attractive urban environment.

Introducing design standards to promote walking and cycling would help to meet many of the social and environmental objectives. Particular benefits would be achieved if places were designed in such a way that the majority of short journeys were able to be made by foot or cycle– particularly to key facilities such as schools, health facilities and shops. Again the attractiveness of a well designed and functional city could help to attract business investment.

Allocating sites near to key public transport routes would help to achieve the most sustainability objectives. This option would appear to be the one that most significantly contributes towards meeting economic objectives. Not only would it ensure the city benefits from being laid out in a functional manner, the residents would also benefit as access to jobs could be enhanced, particularly for those less well off, without access to a car.

**Issue - Efficient management of minerals**

Option 1, the protection of all mineral resources would have sustainability benefits in terms of encouraging the efficient use of land, the protection of landscape character, restricting development in areas of flood risk and ensuring the continued availability of materials to support future growth in the Borough.

The implications of protecting just enough land to deliver regional targets would be similar to option 1, but less certain. There would be less protection for areas of flood risk and landscape character and there would be less emphasis placed on the need to use land efficiently.

The sustainability implications associated with site restoration are limited. Only the option of restoring sites to create BAP priority habitats or for community use has any significant social implications, with potential benefits in terms of ‘facility’ creation and increased community ‘ownership’ of restored areas. The approach would also have significant benefits for biodiversity, particularly in the long term, and could potentially help to support the production of fuel for the delivery of renewable energy.

**Issue - Increasing access to local facilities**

It can be seen from the appraisal that co-location of facilities helps achieve the most sustainability objectives of the options. The approach would have particular social benefits in terms of reducing the need to travel, increasing access to facilities and helping to create community spirit. In environmental terms benefits would include the efficient use of land, spin-offs in terms of less pollution from combined trips and increased potential for energy efficiency measures to be developed.
Dispersed rural facilities would do little to meet sustainability objectives. It would provide an element of flexibility to enable specific community needs to be met and opportunities to make use of sites as and when they become available. However, overall it would increase the need to travel, would not deliver easy access for all, and would have negative environmental impacts associated with increased travel.

The protection of rural facilities helps achieve many of the environmental and social objectives, particularly in the short term. In the longer term there is uncertainty about the continued viability of rural facilities, which need to be able to respond to changes in social and economic conditions. However, this approach has merits in terms of maintaining character of the rural area, preventing an urban/rural disparity occurring and retaining community spirit.

**Issue - Balance growth of the city against existing areas and pressures**

The allocation of specific development sites within the urban area helps to meet the majority of the sustainability objectives across all three areas. The only areas of concern could be the lack of flexibility to respond to general changes in the economy and emerging local needs, and the potential conflict with allocating sites within areas of historic conservation.

A reliance on speculative development has the advantage of allowing a more flexible approach to changing situations and conditions. However, it does not provide the certainty that is needed to deliver a robust plan. It would lead to a requirement for a larger greenfield land allocation to meet housing need and potentially lead to pressure for unsuitable sites to be developed, which would have been ruled unsuitable through option 1. This lack of certainty would mean more pressure would be placed on environmental resources (including heritage assets) and a strategic approach could not be taken to the development of renewable energy provision.

**Issue - Reducing health inequality and deprivation**

Both supporting neighbourhood agreements and making health improvement a priority in all new developments would have mainly positive sustainability effects, particularly in the social sector. The achievement of the environmental objectives would be less certain due to the emphasis of both options on tackling a primarily social issue. Any policy incorporating either of the options would need to ensure some emphasis is placed on ensuring social gain is not at the expense of the environment. Both options would have limited impact on economic issues.

An issue with Neighbourhood Agreements is that they may take time to be established, meaning any benefits are more likely to be felt in the medium to long term, rather than immediately.

**Issue - Regeneration opportunities**

The appraisal shows that each of the options would help to achieve different sustainability objectives. Focusing on market towns would meet sustainability objectives in each of the three sections. Primary benefits would be economic, in terms of ensuring centres remain viable and can play an important role in the functioning of the city, complementing CMK. Ensuring accessibility of services and facilities is a key benefit of regenerating market towns across the Borough. Environmentally, there would be uncertainty around the impact on biodiversity and landscape character, cultural heritage and flooding, which would need to be mitigated in other parts of the plan.

Focusing on the statistically most deprived areas would primarily have social benefits. The environmental and economic impact of the approach would be minimal. There would be concern about the overall impact of this approach with the social benefits potentially compromising environmental or economic objectives. There could also be an issue with the deliverability of the approach, with communities needing to accept regeneration, rather than being a part of shaping it.

Option 3 would have many social and environmental benefits. In environmental terms, the identification of areas of search would help to mitigate issues with environmental protection and efficient use of land. The engagement of communities would help with delivery of regeneration projects by increasing acceptance and ownership by local communities. It would also help by enabling regeneration schemes to be tailored to meet specific needs of individual communities.
**Issue - Balancing growth and existing infrastructure**

Overall both approaches will bring about the achievement of the majority of the sustainability objectives. The main difference is the co-ordination that a strategic document brings. It would be advantageous, as it would provide certainty for developers who could be apprehensive how contributions were going to be spent. It would also help by delivery by having the ability to identify key strategic projects and how they would be funded.

However, it is clear from the appraisal that any strategic document would need to draw on individual areas of work to be comprehensive and robust. The work and level of detail in individual documents, such as SPDs and service plans, makes them an essential tool in ensuring delivery of particular objectives.

There is a clear case for continued use of individual, topic based documents, but the role of a co-ordinating strategic document also appears to be very important.

**Issue - Providing flexible and supporting living spaces**

It can be seen from the appraisal that each of the options help to achieve a significant number of the sustainability objectives. In particular encouraging flexible spaces and areas within Milton Keynes would have benefits across all three sections. The obvious benefit of this approach is that places would be able to evolve more easily over time to adapt to changes in social, environmental and economic conditions. The one area of potential concern is that too much flexibility in design could detract from the primary function of buildings in the short to medium term.

The provision of a local centre within 500 metres of all housing would have particular social benefits, as it would provide accessible facilities and provide opportunities to improve the vitality of areas. There would potentially be indirect impacts on local perceptions of safety and human health, and the secondary effects would include improvements in environmental conditions. The only concern is the potential proximity of local centres to each other. The centres need to have appropriate catchment areas to make them viable locations for businesses to invest in.

Improving access to non-local facilities needs to be via sustainable modes of transport else the potential impacts could be negative. Examples of non-local facilities could include employment and areas of heritage, which could both benefit from improved access.

**Issue - Meeting housing need**

From the appraisal it can be seen that there would be numerous benefits of providing detailed policies on housing types and tenures, particularly with regards to social and economic objectives. The main negative impact could be the decrease in value of residential land resulting from increased restrictions for developers. It will be essential that any requirements have regard to viability and restrictions to ensure delivery is not compromised.

Not having this policy guidance would have the advantage of potentially making brownfield sites more deliverable by the market. However, without the guidance, achievement of many of the objectives is uncertain. Much would depend of the individual approaches of developers to effectively respond to local requirements. There have been examples of this happening, but there is no guarantee this will continue in the future.

In environmental terms, neither approach would have a major impact on the objectives. The one point to note is that increased restrictions on housing size and/or tenure could lead to developers seeking a compromise in other requirements, such as sustainable construction, on viability grounds.

**Issue - Creating safe places**

Designing out crime would help to meet the majority of social, economic and environmental objectives with the only possible negative impact being the potential loss of biodiversity through the design/redesign of areas. Benefits of the approach would include a more attractive and useable environment, which could promote walking and cycling and have subsequent benefits for air quality and emission levels.
Concentrating on supporting community participation would also help meet many sustainability objectives, mainly the social and environmental ones. Particular benefits of the approach to crime would be the potential for spin-off benefits in terms of skill and self management of environmental issues, such as waste management.

**Issue - The role of CMK**

It can be seen from the appraisals that option 3 (cultural assets) only has limited sustainability implications. The main negative effect would be the impact on investment in culture elsewhere in the city. The positive impacts include improving the image of Milton Keynes, the potential protection of the unique character of the centre and the social benefits in terms of improved facilities and spin-off health benefits.

Retaining the existing retail hierarchy helps to achieve more sustainability objectives than seeking a flatter structure. The major benefits of retaining the approach over the flatter structure would include the efficient use of land, control over noise and air pollution, the support for sustainable transport, the protection of historic assets and the potential benefits for the provision of renewable energy. The negative implications of adopting the approach would be focus on town centres as there would be little in the way of increased investment in the centres and smaller local centres would continue to be susceptible to anti-social behaviour.

**Issue - Creating a knowledge based economy- the distribution and use of employment sites**

Each of the three options has sustainability benefits. Targeting new employment development primarily on CMK and town centres has the most benefits particularly around the areas of accessibility, the efficient use of land and helping to support the viability of town centres. The only negative impact could potentially be the impact of increased transport activity in centres, which could lead to congestion.

Identifying locations for particular types of development provides an opportunity to ensure that sites identified lie outside areas of environmental constraint. The other main advantage would be the ability to provide areas for employment that are specifically suited to supporting particular types of employment. There are significant negative impacts of this approach based around the potential lack of concentration of employment areas. It would be difficult to support the delivery of an efficient transport system and would make supporting the delivery of renewable energy provision difficult.

Being flexible about which types of industry can use employment land offers both sustainability advantages and disadvantages. It is positive in that it would help to maintain an efficient use of land and provide greater flexibility for businesses to locate their premises. However, the flexibility could also increase the possibility of inappropriately located businesses, in terms of noise and pollution, and limit the potential to plan for large scale renewable energy schemes that could be possible if the uses of particular sites were known. This option may also compromise the character of historic areas if inappropriate uses are introduced to some of the older employment sites.

**Issue - Creating a knowledge based economy- the provision of suitable sites**

It would appear that the continued protection of all employment sites would have numerous negative sustainability impacts, mainly due to the potential inability of older sites to adequately cater for the needs of the modern economy and the subsequent deterioration of these sites if new employment uses cannot be found. Other negative impacts would include the lack of potential for the development of more energy efficient buildings and the impact on the image of these areas- with potentially negative social spin offs. On a positive note this approach would ensure that older industrial areas would be more likely to retain their traditional character and that employment sites are spread across the Borough.

The redevelopment of poorly performing employment sites would be more sustainable as it would allow opportunities for change to be taken. On social grounds it would allow new facilities to be developed, including housing, and remove the negative impacts that run down employment sites could have on communities. There are some uncertain environmental impacts, including impacts on biodiversity and heritage that could to be mitigated through policy wording. This approach would be beneficial to building efficiency and renewable energy as it would provide opportunities to replace older, less efficient building with more efficient structures.
Encouraging business growth on existing sites would have mainly positive impacts. Socially it could potentially mean more land being available for housing development and opportunities to plan a city where jobs are well accessed by public transport. Environmentally, it would be particularly beneficial as it limits the need for new development sites, encourages the efficient use of land and helps reduce pollution through potentially improving the viability of public transport. Economically, the approach would provide opportunities for business growth and continuity as well as supporting the development of business clusters.

The allocation of a range of new sites has the advantage of being able to respond effectively to the specific current requirements of the employment market. Other positive impacts would be the opportunity to develop efficient new facilities and the improved attractiveness of Milton Keynes as an investment location, which would help to ensure a continued supply of new jobs. Negatively, it would require the allocation of new sites, which could potentially be used for housing, and would also potentially put pressure on areas of important agricultural and/or biodiversity/landscape importance. There are many uncertain effects that stem from not knowing exact site requirements. If this were to be a Preferred option then more specific detail as to site requirements would be needed to fully assess the sustainability impacts.

Issue - Creating a learning city and skilled workforce working in Milton Keynes
Supporting the needs of MK College and adult continuing education has very little impact in sustainability terms, with only some impact in terms of ensuing residents have the skills required to participate in the workplace.

Identifying a location or locations to combine learning and employment has more impact in sustainability terms. From a social perspective it would have similar benefits as option 2 in helping to support the development of appropriate skills. Environmentally, the option would help to deliver the efficient use of land and decrease pressure on environmental resources. It would also potentially lead to increases options for the development of on-site renewable energy provision. The only negative could be the increase in traffic concentrations around these areas, which would need to be mitigated through other areas of policy. In economic terms the approach is advantageous. The main advantage would be that the skill requirements of local residents could be matched to those required by the job market. One important consideration is where these sites could/should be encouraged. The impact on town centres is particularly important, as is ensuring that businesses can locate in an area that will not compromise their performance in other areas, such as accessibility.

Issue - Supporting small and creative industries
Both of these options have mainly positive or uncertain sustainability effects. The protection of existing small units and the development of new units as part of industrial redevelopment have the advantage of helping to achieve the objectives of brownfield development and supporting the retention of employment in areas where it has traditionally been found. They also generally benefit from having more certainty over where the small business areas would be found.

This is less certain with the allocation of new areas for small business units, which means the effect on many of the sustainability objectives is unknown without more site specific information being known. The approach does provide opportunities to deliver sustainability benefits but it would be dependent on several locational and design considerations.

Issue - Providing sporting facilities of national significance
It can be seen from the appraisal for option 1 that locating major facilities in central locations around the city has far more positive sustainability implications than allowing out of centre development, particularly in environmental terms. The main areas where option 1 out-performs option 2 focus around the implications for sustainable movement, with associated impacts for accessibility and the environment. There are also benefits in terms of the use of brownfield sites rather than greenfield land, with wider implications for flooding and the protection of open spaces. The social benefits of major sporting facilities would also be more widely felt if facilities were located in central locations due to the higher level of exposure and accessibility to them for communities.
Consideration of the issues in choosing and developing the Preferred Options

a) The development of the MK Growth Strategy; Assessment of Spatial Principles developing the Preferred Spatial Strategy

10.18 Consideration of the issues raised through the SA of the Growth Strategy was one of the key components in the Options for Growth Evaluation Report. This part of the process also involved stakeholder feedback, assessment against planning policy objectives, an assessment of land suitability and transport modelling (including an assessment of the ability to deliver key infrastructure).

10.19 As a result of this process, it was decided that a variant of option 1, with a slightly lower urban capacity model than the medium model in option 4, was the most sustainable growth model. This work has been taken forward into the Core Strategy and informs Chapter 1 of the Preferred Options document.

10.20 It was recognised that the approach taken to identifying directions of growth in the Strategy was ‘high level’ and ‘broad brush’, with a need for appraisal of the underlying ‘Spatial Principles’ to be undertaken to ensure the strategy was based on firm sustainability grounds.

10.21 As such a set of themed ‘Spatial Principles’, informed by Design and Development Principles, were set out in the Growth Strategy to guide the future development of the city. They are grouped into 10 ‘components’, including Natural Assets, Urban Extensions and Hierarchy of Centres. An assessment was undertaken to assess the beneficial and adverse effects of delivering these components through the proposed directions of growth.

10.22 Of particular importance in this assessment was the identification of those principles that would have adverse effects on sustainability objectives if delivered through the proposed directions of growth. The outcome of this appraisal process was a series of recommendations as to how the Spatial Principles could be amended to meet more of the Sustainability Objectives of the Growth Strategy. A summary of these recommendations can be seen in Section 11 ‘Task B5 Mitigating adverse/maximising beneficial effects - Preferred Options assessment’.

10.23 This information helped to inform the identification of the issues to be tackled through the Core Strategy. To ensure a sustainable plan is produced, these issues will need to be addressed through the policy content of the final Core Strategy Document.

b) Main considerations from the appraisal of the Core Strategy Options

10.24 Table 10.2 ‘Conclusions from the appraisal at the Issues and Options stage’ sets out the conclusions from the initial appraisal of the options considered for the policies in the Core Strategy. These conclusions helped to inform the decision makers as to what should be the Preferred Options for the strategy.

10.25 As well as the individual conclusions, there are several cross cutting issues that emerged out of the initial appraisal process which needed to be taken into account when developing the Preferred Options. The following section provides an overview of these issues and makes suggestions as to how they could be mitigated through the development of the plan.

10.26 At this stage it became apparent that many of the sustainability implications of the options could not be fully established until more site-specific detail was known. This is to do with the nature of the Core Strategy and the issues that were being addressed. It is suggested that SA of future documents, including any Area Action Plans and the Site Allocations Development Plan Document, is the best place for these issues to be fully addressed.

10.27 The importance of considering impacts on accessibility and movement stood out as being of significant importance, cutting across issues in all three sections, with health, pollution and the economy, amongst other factors affected by the accessibility and movement. Linked to this is the importance of ensuring high design standards. The implications of numerous options depended on the final design standards of development.

10.28 Consideration of the deliverability and wider implications of policy also needs to be a major consideration in setting standards in policy. Appraisals suggested that over restrictive requirements, whilst helping to achieve certain sustainability objectives, could have a negative impact in other areas, such as delivery speed and scale of housing delivery and the viability of delivering social infrastructure. Policy writers will need to consider whether any criteria that are placed in policy are essential and what their wider impacts may be. This needs to be a consideration now and in future policy documents.

10.29 The need to ensure inclusion was also overriding. This included ensuring all residents have the opportunity to benefit from growth in the Borough, that any demand management measures (particularly related to transport) do not exclude residents and also that residents continue to be able to have an input into how growth affects their neighbourhoods. It was suggested that a specific section related to existing communities be created to specifically look at these issues.

10.30 The relationship between landscape character and a range of other issues was highlighted. Appraisals pointed to the relationships between landscape character and biodiversity, minerals, flood protection and health, amongst others, showing the integral role that it plays in the functioning of a sustainable city. It was suggested that landscape character could warrant its own section in the Preferred Options.

10.31 The need to ensure that older parts of the Borough, including town centres and older city estates, are integrated into future growth stood out as an issue. The importance of integrating poor performing estates into the growth of the city is highlighted by the potential to improve crime levels, health standards, educational and economic performance. Town centres are also important provider of jobs, accessible facilities and heritage assets, meaning it is essential that they are not left behind through the growth of the city. Policy writers will need to consider how these regeneration issues are best addressed alongside the need to support CMK as a regional centre.
11 Task B5 Mitigating adverse/maximising beneficial effects - Preferred Options assessment

A summary of the recommendations from the MK Growth Strategy SA Report

11.1 As outlined in Chapter 10 the initial outcome of the SA of the options for growth was that a variant of options 1 and 4 was the preferred strategy for growth. A series of Spatial Principles, which are the components underpinning the Growth Strategy, were prepared describing the preferred principles that the strategy should be able to deliver. These components were tested against the framework to determine to what degree they could be delivered by the draft Growth Strategy. Particular issues have been identified with relation to the differing circumstances in expansion areas and within the existing urban area. The recommendations made are summarised below, with the full conclusions of the appraisal available in Chapter 13 of the Growth Strategy SA Report.

11.2 As well as informing the production of the finalised Growth Strategy, these particular recommendations also provide clarification of the key issues that need to be included in the Core Strategy. Policy writers should ensure that the recommendations below are covered by the Preferred Options and final policy wording reflects the requirements, to help deliver sustainable growth.

Climate Change

11.3 A recommendation was made for more specific guidance for developers to be included within the strategy, rather than relying on building regulations and voluntary codes to be sufficient.

Resource Use and Waste Management

11.4 Related to the cumulative impact of the loss of greenfield land and significant resource use for the high level of construction, a concern was raised about provision of resources. It was recommended that more could be done to encourage the efficient use of resources through proactive requirements on both employment and residential development proposals.

Water Resources and Quality

11.5 The assessment concluded that more needed to be done to ensure that drainage systems are not affected and water quality is not compromised. Recommendations included carrying out a water cycle study and including specific design requirements to ensure efficient use of water in any sustainability policy.

Transport

11.6 The strategy incorporates the principles that support the use of sustainable modes of transport. However, delivery of the required infrastructure needs to be either before or at least in line with new development; 2) commitments and funding for implementing the schemes needs to be ensured; and 3) hard demand management measures need to be closely co-ordinated with public transport infrastructure implementation.

Archaeological and Heritage Interest

11.7 More reference is needed to the potentially adverse affects that growth areas may have on areas of historic importance beyond the built up area of the city, with amendments needed to show how adverse impacts on the area could be mitigated, including the historic waterway of the Grand Union Canal. This could include specific measures aimed at ensuring archaeological remains are appropriately recorded and accommodated within the development process.
The Core Strategy Preferred Options

11.8 At the Preferred Options Stage a series of policy directions were identified, which established the basis of the final content of the Core Strategy. In developing these proposals and policy directions, regard was given to the conclusions and recommendations made in Chapter 10 and sections 11.3 to 11.7 of this report. Regard was also given to issues raised through the Growth Strategy work. Providing more detail of the policies and proposals ensures that significant negative and beneficial impacts can be identified more accurately and suitable methods to mitigate negative and enhance positive effects be incorporated into the final plan.

11.9 This section looks to the proposed policy approach, establishing any significant environmental, social and economic effects of implementing the policies. This enables mitigation methods to be suggested, to be taken on board when writing the detailed wording of polices in the Core Strategy, ensuring sustainability is at their heart. The policy directions appraised at this stage can be seen in Technical Document 3 Appendix 11.

11.10 The changes suggested in this section may seem minor in some cases. This is mainly due to the fact that the majority of options will be the most sustainable alternative put forward at issues and options stage. Therefore this stage of the process simply made suggestions as to how they could be made more sustainable in the Pre-Submission version of the document.

Significant social, environmental and economic effects of the preferred options and recommendations for mitigation

11.11 These policies and proposals were appraised using the framework in set out in 7 ‘Task A4 Developing the SA Framework’. Each of the individual policy directions was appraised to determine whether it supported or conflicted with each of the sustainability objectives, the likelihood of the impact occurring, how this might change over time, any cumulative, secondary or synergistic effects and their scale, in terms of geographical area covered.

11.12 For each, a summary of the impacts has been provided along with recommendations for the mitigation of any negative impacts and maximisation of any positives created.

11.13 The assessment was primarily based on expert opinion. The same ‘scoring’ system used in the previous appraisal of the strategic options was used again at this stage (see 10 ‘Tasks B3 & B4 Predicting and evaluating the effects of the Core Strategy’).

11.14 The full appraisal of each policy direction can be seen in Technical Document 3 Appendix 12. Below is a summary of the assessments, a summary of the recommendations made and a review of the synergistic, cumulative, indirect and geographical spread of effects.

11.15 The Preferred Options document was split into five sections. The first of these “directions for growth” has been described in the previous section and was based on the SA work for the Growth Strategy, the others are listed below.

a) Managing our impact

Policy direction - Encouraging healthy lifestyles

Conclusion

The policy direction will have mainly positive sustainability impacts, particularly in social and environmental terms, and also particularly in the long term once new development is completed.

Recommendations and mitigation measures

- Consider the potential to specifically mention supporting measures to increase activity in young residents.
- Need to ensure that a specific policy on creating safe communities is included in the plan.


- Consider the need for local communities to be involved with the identification of potential redevelopment sites.
- Could make more specific reference to the need to increase access to public transport facilities through new development.
- Could consider the need to protect areas of high agricultural quality to help ensure continuation of local food production.

**Policy direction-Reducing reliance on the car and encouraging travel by bus, cycle and on foot**

**Conclusion**

The policy direction will help achieve many of the sustainability objectives. Achieving a behavioural change in attitudes to travel will need to occur, meaning greatest effects will be achieved in the longer term

**Recommendations and mitigation measures**

- Ensure demand management measures are viable and fully consider impacts on all residents. Consider setting a standard within which viable local shopping facilities can be provided
- It needs to be made clear that the achievement of the social and economic benefits of the policy direction will not be at the expense of environmental protection. Suggest additional text is included to mitigate this.

**Policy direction-Reducing waste, landfilleding and use of mineral resources**

**Conclusion**

The policy direction would achieve many of the environmental sustainability objectives and two of the social objectives. There appears to be no impact on the economic objectives.

**Recommendations and mitigation measures**

- Make it clear how the provision of construction waste facilities will be facilitated
- Strengthen policy wording to ensure traffic and environmental impacts of construction waste recycling facilities are considered
- Ensure plan adequately protects areas of highest environmental quality from extraction

**Policy direction-Efficient management of water**

**Conclusion**

The policy direction appears to have only limited impacts on sustainability objectives, with these focused mainly on environmental aspects. There are a number of indirect benefits associated with the implications of limiting development in flood risk areas.

**Recommendations and mitigation measures**

- Specifically require the consideration of habitat creation/enhancement through in the design of surface water drainage schemes
- Consider including specific wording to require any development in or around areas of flood risk to mitigate any potential impacts through appropriate design measures
- Investigate further the viability of a water neutrality policy—would it be better addressed in a future document?

**Policy direction-Creating carbon zero communities**

**Conclusion**

The policy direction would help to deliver sustainability objectives in all three sections. There are areas of uncertainty around landscape character, biodiversity and cultural heritage protection, which could be mitigated.
Recommendations and mitigation measures

- Give consideration to the deliverability of the set targets
- Include specific policy wording to ensure that landscape character and biodiversity is not overlooked when looking at managing environmental impacts
- Consider the need to include ‘protection of cultural heritage’ in the final policy wording

b) Managing our Assets

Policy direction - Protect and enhance the historical and cultural assets of the New Town and the towns, villages and countryside beyond

Conclusion

The policy direction would deliver sustainability benefits, particularly in social and economic areas. The policy direction would ensure that the historic environment of the Borough and the resources of modern 20th and 21st century city are protected. This approach would indirectly ensure efficient use of available land and better management of construction waste.

The areas of uncertainty involve the lack of certainty around conservation of the historic environment and energy efficiency of designated buildings and greater use of renewable energy.

Recommendations and mitigation measures

- The final policy document could benefit from stating how improved energy efficiency of historic buildings will be achieved
- The final document should ensure that design principles are effectively implemented.

Policy direction - Maintain and enhance green infrastructure and open spaces

Conclusion

The policy direction will contribute to a range of social, economic and environmental objectives. The policy will primarily focus on providing high quality green open space which meets different needs of existing and future residents.

Recommendations and mitigation measures

There are no recommended changes to the plan

Policy direction - Protect and enhance the Borough’s rural landscape

Conclusion

The policy direction would have mainly positive sustainability impacts, particularly in environmental terms. There is also a number of social and some economic positive contributions. The policy may have some negative impacts on housing development in the countryside.

Recommendations and mitigation measures

- The final document should clarify how rural housing will be provided.
The final document should identify how development in the rural area will be in-keeping with the protection of the rural landscape. The final document should seek to mitigate the indirect impact of restricted employment opportunities in the rural area.

**Policy direction—Protect and enhance the biodiversity and geological resource of the Borough**

**Conclusion**

The policy direction would have many positive sustainability effects. It mainly focuses on environmental principles that indirectly will stimulate social and economic development.

**Recommendations and mitigation measures**

- It should be considered whether additional wording is needed in the policy to ensure that social and economic priorities are not overridden by principles of environmental protection.

**c) Supporting the city’s economy and sub-regional role**

**Policy direction—Create a Learning City and Skilled Workforce Working in Milton Keynes**

**Conclusion**

The policy direction will has many positive sustainability impacts. The economic benefits are significant but there are also social impacts, primarily in terms of increased educational opportunities, and environmental benefits, primarily involving the efficient use of land and the development of modern, efficient facilities.

**Recommendations and mitigation measures**

None

**Policy direction—Create a knowledge based economy**

**Conclusion**

The policy direction would have significant economic sustainability benefits due to the type of facility that will be encouraged and the range of employment opportunities that would be available in the city. There is an element of uncertainty about the protection of cultural heritage as there is a lack of certainty about the future of older, underused employment areas. There is also a negative impact in terms of the delivery of housing as there is an issue with competing land uses.

**Recommendations and mitigation measure**

- Refer more specifically to the potential relationship between housing and employment areas
- The final document should make it clear if existing, underused employment sites will be protected from redevelopment to other uses.
- There may be scope for providing additional detail on how often background studies will be updated to ensure the type of facility being encouraged is in line with economic requirements.
Policy direction-Enhance Central Milton Keynes as a Major Office, Retail and Cultural Location

Conclusion

The policy direction overall has a number of positive sustainability effects but there are a couple of uncertain and negative effects that will need to be mitigated in the final plan. The areas of uncertainty include the impact of the policy direction on housing in CMK and the potential for increased visits to the centre via car. The negative effect centres on the potential impact on other centres in the Borough if investment is focused on CMK.

Recommendations and mitigation measures

- The final policy could make reference to the role of housing in CMK.
- Ensure that measures are included to mitigate against increased transport activity encouraged by new and expanded facilities.
- Consider the potential for original elements of the original city plan to be considered as pieces of cultural heritage
- Support the futures of other town and district centres by ensuring they continue to play a role in the functioning of the wider Borough area.

Policy direction-Support Small and Creative Industries

Conclusion

The policy direction primarily affects the economic sustainability objectives, with many positive effects. There are limited environmental effects, with only an uncertain impact on noise and air pollution needing to be addressed. The one negative effect is concerned with the implications of the policy direction on the deliverability of housing, with the need to include SBUs on redeveloped industrial sites having land-take and financial implications.

Recommendations and mitigation measures

- It may be appropriate to build an element of flexibility into the plan to enable approaches to be adapted for particular developments
- The final policy wording could be enhanced by making reference to the role that small business units/enterprise centres can play in the regeneration of city estates.
- Ensure that measures are in place to mitigate against any potential conflicts between business/industrial and residential uses (in terms of noise/pollution)

Policy-Create new sporting facilities of national significance

Conclusion

The policy direction has limited effects in sustainability terms. There are positive effects in terms of the benefits for health, the use of public transport and town centres. There are uncertain impacts on noise and air pollution and potential implications for crime levels and deprivation, which would need to be mitigated.

Recommendations and mitigation measures

- The policy wording could be enhanced to give details of how access to sport and recreation could be improved.
- The final plan should include measures to ensure that leisure space is well designed and integral to the functionality of estates.
- Ensure that measures are in place in the plan to mitigate use of the car and that residential areas are not exposed to disturbance from major sporting facilities.
- Provide additional detail of how public access to sport and recreation will be increased
- Could increase the level of detail given in the policy to explain what is classed as a sustainable location

11.16 d) Serving Existing Communities
Policy direction - Increase access to services locally

Conclusion

The policy direction would have many benefits in sustainability terms based primarily on the benefits of shared journeys and the efficiency of co-locating facilities. There was one area of uncertainty related to potential problems with car travel to concentrated facilities.

Recommendations and mitigation measures

- It should be ensured that other areas take measures to effectively manage car travel.
- Design is vital when supporting improved access to facilities; measures need to be included to secure effective design principles.

Policy direction - Ensure balanced growth of the city and existing areas and pressures

Conclusion

The policy direction would have many positive sustainability effects. In environmental terms there are some concerns that the policy puts more emphasis on achieving social and economic objectives above environmental ones.

Recommendations and mitigation measures

- The final policy wording should make reference to any development in existing areas having regard to environmental constraints and requirements.
- The need to consider heritage protection should be acknowledged in the final wording.

Policy direction - Balance growth of the city with the delivery of key infrastructure

Conclusion

The policy direction would have many positive sustainability effects across all three areas. The appraisal of the option had to make assumptions about how growth would be ‘managed’ as this was not clear from the policy direction. The inclusion of more detail in the final policy wording is one of the recommendations to improve the final plan.

Recommendations and mitigation measures

- The final policy needs to state what is classed as ‘key infrastructure’.
- It should also state how the growth will be managed (i.e. through the Business Plan) as this is currently not clear in the policy.

Policy direction - Reduce health inequalities and deprivation in the worst ranked areas

Conclusion

The policy direction would have significant positive sustainability benefits, particularly in social terms. The ability of the approach to engage and respond to specific problems in specific issues. There is an element of uncertainty around environmental issues, with the policy direction seeming to focus primarily on social and economic priorities.

Recommendations and mitigation measures

- It should be considered whether additional wording is needed in the policy to ensure that environmental protection is given equal weight as social and economic priorities.
### Policy direction-Increase housing delivery for market homes, affordable housing, and housing for minority and ethnic groups

#### Conclusion
The policy direction would deliver sustainability benefits, particularly in social and economic areas. The policy direction would indirectly ensure efficient use of available land and help to tackle specific waste issues associated with some HiMO developments in city estates. The areas of uncertainty involve the lack of certainty around housing demand, based on factors such as the wider economic climate, and objectives that depend on detailed design issues to be achieved, such as the effect of housing design on health.

#### Recommendations and mitigation measures
- The final document should include a timetable for reviewing and revising the plan to consider changing social and economic circumstances
- The final policy document could benefit from stating how improved design will be delivered (i.e. through more policy in the DC policies document)

### Policy direction-Enhance existing areas where there are regeneration opportunities that are supported by local people

#### Conclusion
The emphasis of the policy is on ensuring local communities are comfortable and benefit from regeneration in the Borough. It therefore follows that the majority of benefits are associated with social aspects. The approach would also have little environmental benefits, in the medium to long term.

#### Recommendations and mitigation measures
- The final policy document should ensure that there is an effective mechanism in place to identify areas of regeneration potential and engage with communities.
- The policy direction could set out priority issues to be addressed on city estates including health, crime, access to facilities and the efficiency of housing

### e) Growing New Communities

#### Policy direction-Ensure balanced Growth of the city

#### Conclusion
The policy direction has limited sustainability impacts. Several environmental objectives are achieved through preventing coalescence of existing settlements into the city area, including the protection of landscape and cultural character and protecting existing residents form any potential negative impacts of increased activity, including noise and air pollution. Socially and economically the existing centres could benefit through being given an enhanced role in the functioning of the Borough, scale as centres for health and education facilities. Improvements would not only benefit new residents but existing residents as well.

#### Recommendations and mitigation measures
- The final policy direction could provide details of the proposed barriers to the edge of the urban area to aid place shaping and provide certainty
### Policy direction - Create flexible and supportive living space

**Conclusion**

The policy direction would primarily effect social sustainability objectives, with the support for families being provided by flexible housing and the accessibility to services being the major benefits socially. Environmental benefits are also achieved through encouraging the efficient use of land, potentially minimising construction waste and helping to potentially deliver future heritage assets for the Borough.

**Recommendations and mitigation measures**

- The final plan will need to ensure that demand management measures are in place to help control the level of car use in the city.

### Policy direction - Balance growth of the city with the delivery of Key Infrastructure

**Conclusion**

The policy direction would bring several sustainability benefits, mainly due to the co-ordinating role that it encourages. It would help to ensure specific infrastructure, such as a university, remains integral to the future growth of the city, and would also help to deliver other spin-off benefits, such as making MK an attractive investment location and enabling businesses to function effectively.

**Recommendations and mitigation measures**

None

### Policy direction - Increase housing delivery for market homes, affordable housing, and housing for minority and ethnic groups

**Conclusion**

The policy direction would deliver sustainability benefits, particularly in social and economic areas. The policy direction would indirectly ensure efficient use of available land and help to tackle specific waste issues associated with some HiMO developments in city estates. The areas of uncertainty involve the lack of certainty around housing demand, based on factors such as the wider economic climate, and objectives that depend on detailed design issues to be achieved, such as the effect of housing design on health.

**Recommendations and mitigation measures**

- The final document should include a timetable for reviewing and revising the plan to consider changing social and economic circumstances
- The final policy document could benefit from stating how improved design will be delivered (i.e. through more policy in the DC policies document)

### Policy direction - Key Criteria for New Communities

**Conclusion**

The policy direction covers many general points and therefore helps to achieve many of the sustainability objectives, particularly the social and environmental ones. The impacts on economic objectives are less, with the only indirect effect being on existing town, district and local centres.

**Recommendations and mitigation measures**

- The policy direction could make specific reference to the need for extension of the linear park network.
The final policy wording could seek to include the efficient management of water as being integral to the development of new communities.

The wording of the policy direction could be enhanced to seek connections with key elements of the existing settlement, such as employment areas, shops and services.

**Policy direction- Create Safe Places**

**Conclusion**

The policy direction will primarily help to achieve social sustainability objectives, with some more limited benefits in environmental terms. Many of the social effects would occur indirectly as a result of improved safety on estates and the synergistic effects of the mechanisms for securing improved safety, such as utilising schools to improve crime levels. Environmental benefits are more limited but the policy direction would indirectly support the efficient use of land and help to steer development away from areas exposed to flood risk and noise pollution.

**Recommendations and mitigation measures**

None

**Overview of geographical scale of impacts**

11.17 From the appraisal of the policy directions it can be seen that the majority of the sustainability effects will have an impact on the general Borough area. There are instances where certain policy directions associated with growth will primarily have an impact on the urban fringe and rural areas. Similarly, policy directions that are associated with supporting the existing urban area will mainly have an impact on the urban area.

11.18 There are instances where the effects of the strategy could have a regional impact, such as those policies that promote the importance of CMK as a business destination. The strategy also supports the development of the city economy, which could have a regional impact in terms of attracting new investment from the wider region.

**Overview of synergistic, cumulative and indirect effects**

11.19 The assessment of the policy directions was focused primarily on their direct effects. The SEA regulations require that their expected synergistic, cumulative and indirect effects are also assessed and recorded. This includes assessing where impacts of particular policies interact to produce effects that are greater than the sum of the individual effects. The synergistic, cumulative and indirect effects recorded are summarised below. To aid this analysis, a matrix of the cumulative impacts of the policy directions and proposals was compiled. This can be seen in Technical Document 3.

11.20 The matrix shows that there are no particular problems associated with the cumulative impact of the policy directions on the sustainability objectives. The matrix does highlight that there are limited impacts, both positive and negative, on three particular objectives. These are to: provide facilities for the whole community, tackle climate change by reducing emissions of green house gases from domestic and environmental sources, and maintain and improve the Borough’s water quality and risk of flooding.

11.21 It will be important that consideration is given to how more can be done to achieve these objectives and maximise any positive effects the policy direction will have. The completion of the Water Cycle Strategy should help to provide more information on the effects of flooding.

11.22 In terms of synergistic impacts, the main effect is that of housing design (particularly density) and the provision of attractive open space and movement network. On their own these have limited positive effects on sustainability, but when combined they can play a significant role in changing peoples behaviour in terms of the way they use their neighbourhoods and the surrounding area.
Another significant synergistic effect is that of the continued focus on CMK as the major job centre and the focus on development in centres such as Bletchley and Wolverton on the success of the local economy. The combined effects of this will enable more efficient provision of public transport across the city, helping local residents gain easier access to jobs in CMK, and potentially freeing up car parking space in the city for visitors, effectively increasing the capacity of the city centre.

There are several indirect effects of the preferred policy directions. One primary area where indirect effects occur concerns the protection of rural landscapes and restrictions in the rural area generally. Negative indirect effects of this include limited potential for affordable housing in the rural area and a restriction on employment potential in rural areas. Positive indirect effects include an impact on the efficient use of available land (due to pressure for more efficient use of land to meet housing targets), an increase in the use of brownfield sites and improved level of focus on existing centres.

There are also indirect effects associated with the impact of design related policy directions. These include the positive impacts on crime, open space the efficient use of land, public transport provision, health and the viability of town, district and local centres associated with a greater emphasis on creating zero carbon communities.

This also works in reverse with policy directions on the distribution and creation of place indirectly having a positive effect on the potential to support renewable energy and zero carbon communities.

Other policy directions, such as that on affordable housing and meeting housing need, will have indirect impacts through helping to ensure the efficient use of land and also by ensuring that the economic benefits through the availability of workers at all skill and experience levels.

The support for office based employment facilities and employment sites in sustainable locations will indirectly help to support the vitality of existing centres, such as Bletchley and Wolverton.

The Growth Strategy Sustainability Appraisal Report also reviews the cumulative, synergistic and indirect effects of growth. These can be seen on page 10-23 of the report. The conclusions are primarily concerned with the cumulative impacts of the proposed scale of development on the environment and the positive effects social effects that can be achieved by well planned, large scale growth.

Uncertainties and risks

The main element of risk and uncertainty would come from the non-implementation of the policies and proposals in the strategy. The overall impacts of complete non-implementation of the plan can be seen as equivalent to doing nothing, essentially meaning there would be no overall strategy for managing growth in the Borough. If individual policies are not implemented then the level of risk will depend on the nature of the individual policy. Of particular concern would be the non-implementation of policies relating to improving public transport, walking and cycling usage. If these policies are not implemented alongside other developments than there is a risk that more people could visit by car, causing pollution and congestion.

Another concern would be that non-implementation of policies which relate to economic development would result in missed opportunities to regenerate town centres. It is essential that a mix of uses is created that ensures maximum impact on town centre vitality and viability. If individual policies are not implemented, there is a risk that the balance between growth and regeneration could be harmed.

Finally, an element of uncertainty is created by the method of appraisal undertaken on the Core Strategy. The strategic nature of the plan means that only broad impacts and trends can be established using professional judgment, with the nature of the options and policy choices making it difficult to apply quantitative analysis. It is felt that this uncertainty can be addressed by the assessment of future policy documents, including the allocations document, where a greater level of detail will make it easier to carry out an effective and accurate assessment.

**Overall Outcomes**

**11.33** Overall it can be seen that the approach adopted in the Preferred Options document is broadly sustainable. The directions for growth, appraised in the Growth Strategy SA report, point to the problematic nature of development on greenfield land. It points it further work to be carried out to manage development in a sustainable manner, which has been prepared in the form of the preferred policy directions.

**11.34** The additional policy directions outlined in the Core Strategy help to address the issues raised through the work in preparing the Growth Strategy and also those issues raised through the review of the baseline information. The policies help to provide additional guidance on design issues, including sustainable construction, which will be key to mitigating the environmental impact of extensive house building. The policies will also help achieve social objectives by ensuring that new communities are created in a sustainable manner and that growth helps address some of the issues affecting existing communities.

**11.35** In economic terms the Preferred Options puts in place a structure which will help support the development of key industries in the city and also which helps to support the emerging role of CMK as a regional centre. It also ensures continued support for the other centres in the borough.

**Implementation and monitoring**

**Links to other tiers of plans, programmes and project levels**

**11.36** The Core Strategy should be in conformity with those plans higher up the plan making hierarchy. This primarily means that it should generally conform to the Regional Planning Guidance for the South East (RPG9) and the emerging South East Plan. As a result of this, any decisions made and appraised at the higher level have been accepted and not appraised again as part of this process. As has been explained previously, this includes the sustainability appraisal work undertaken on the MK Growth Strategy, which was prepared to inform the production of the South East Plan.

**11.37** The sustainability objectives set out for appraisal of regional plans formed the basis of the sustainability appraisal framework to ensure that sustainability objectives for Milton Keynes relate closely to those of the region as a whole.

**11.38** This appraisal will be an important influence on the production of any additional planning documents that emerge to provide more detail on proposals in Milton Keynes. These may include Area Action Plans and Supplementary Planning Documents, as well as development briefs and design guides. As well as this, the appraisal will be relevant in undertaking any required environmental impact assessment work that maybe required for specific projects emerging as a result.
12 Task B6 Proposals for monitoring the significant effects of implementing the Core strategy

Task B6- Proposals for monitoring the significant effects of implementing the DPD.

12.1 Monitoring of the plan enables any unforeseen sustainability effects to be identified and dealt with at the earliest possible stage. It also enables the actual impacts of the plan to be assessed to establish whether they are in accordance with those predicted during the appraisal process. This will enable future predictions to be more accurately informed.

12.2 Monitoring will be carried out against indicators listed as part of the appraisal framework in Technical Document 1. It will be particularly important to pick up on the impact the plan has had on those areas where there were perceived to be conflicts or potentially negative effects, although checking the achievement of the predicted positive impacts is also key.

12.3 Any effects will be noted and assessed against changes at a national and regional level to assess the relative impact of the policies in the Core Strategy.

12.4 The Council already prepares an Annual Monitoring Report to monitor overall achievements against key targets and objectives. Some of the information required to monitor the implementation of the Core Strategy will already be collected through the AMR process, but it is not expected that this will satisfy the requirements of SA or SEA Directive requirements. Therefore separate monitoring arrangements are set out below.

12.5 Table 12.1 below outlines the sources of information for monitoring, including the frequency the information is collected and who often it will be reviewed. It is expected that the monitoring information will be collected alongside the AMR and published in December each year.

12.6 The SEA directive does not require any specific action to be taken if monitoring reveals any adverse effects on the environment. However, if monitoring shows that there are adverse effects the Council will make a judgement as to whether any mitigating action needs to be taken, either by the Council or by other bodies. This will depend on whether the impact is deemed to break critical social, environmental or economic thresholds, whether the impact can be linked to a particular aspect of the strategy or whether the impact can be linked to the actions of a particular group. By carrying out this type of monitoring, the Council will be fulfilling the requirements of Stage E in Government Guidance- ‘Monitoring the significant effects of implementing the DPD’.

<table>
<thead>
<tr>
<th>Objective</th>
<th>Indicator</th>
<th>Current source and frequency of data monitoring</th>
<th>Suggested frequency of SA monitoring</th>
</tr>
</thead>
<tbody>
<tr>
<td>Social</td>
<td>Number of</td>
<td>MKi, quarterly</td>
<td>Annual, through AMR</td>
</tr>
<tr>
<td>1. Ensure that everyone has the opportunity to live in an affordable, sustainably constructed, decent home</td>
<td>affordable housing completions</td>
<td>Mki, annual</td>
<td>Annual</td>
</tr>
<tr>
<td></td>
<td>Housing affordability ratio</td>
<td>MK Community Strategy Indicator 14, annual</td>
<td>Annual</td>
</tr>
<tr>
<td></td>
<td>% LA homes non-decent at the start of the year</td>
<td>BVPI 184a, annual</td>
<td>Annual</td>
</tr>
<tr>
<td>2. Improve the health and quality of life of residents, reducing inequalities in health</td>
<td>Average life expectancy</td>
<td>MKi, annual</td>
<td>Annual</td>
</tr>
<tr>
<td></td>
<td>Standard mortality ratio</td>
<td>Neighbourhood Statistics</td>
<td>Annual</td>
</tr>
<tr>
<td></td>
<td>Number of FTE Doctors per 1000 NHS Information Centre, population</td>
<td>Annual</td>
<td></td>
</tr>
<tr>
<td></td>
<td>% Good general health</td>
<td>Census, 10 yearly</td>
<td>Census, 2011</td>
</tr>
</tbody>
</table>
### Task B6 Proposals for monitoring the significant effects of implementing the Core Strategy

<table>
<thead>
<tr>
<th>Task</th>
<th>Indicator</th>
<th>Frequency</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>3. Reduce poverty and social exclusion, closing the gap between Milton Keynes’ most deprived areas and the average.</td>
<td>IMD Rank, Number of LSOAs in the most deprived 20% nationally, % of Jobseekers Allowance (JSA) claimants as a proportion of resident working age people</td>
<td>Biannual (if available)</td>
<td>DCLG, approximately every 2-4 years, NOMIS, annual</td>
</tr>
<tr>
<td>4. Raise educational achievement and skills acquisition to allow everyone to find and stay in work</td>
<td>% of working age population with Literacy entry level and above (1,2), Numeracy entry level and above (1,2), Level 4 qualifications</td>
<td>Annual (if updated)</td>
<td>DFES, MKC Annual Population Survey, DFES, MKC Annual Population Survey, MKC Annual Population Survey</td>
</tr>
<tr>
<td>5. Reduce crime levels and fear of crime and create vibrant communities</td>
<td>Overall crime rate, Burglaries per 1000 dwellings, Violent crime in a public place</td>
<td>Annual</td>
<td>Government Floor Target, BVPI, 126, BVPI, 127b, annual</td>
</tr>
<tr>
<td>6. Improve accessibility to services and facilities</td>
<td>Mode share of journeys to school, Number of hospital beds per 1000 population, Number of school places per 1000 population</td>
<td>Annual</td>
<td>Local Transport Plan, PI LTP4, annual, HEFS Information centre, MKC Education Dept</td>
</tr>
<tr>
<td>7. Provide facilities for all sections of the community</td>
<td>Number of new community spaces provided, % satisfied with local parks</td>
<td>Annual</td>
<td>ECMS database, Government Floor Targets</td>
</tr>
<tr>
<td><strong>Environmental</strong></td>
<td><strong>Environmental</strong></td>
<td><strong>Environmental</strong></td>
<td><strong>Government Floor Targets</strong></td>
</tr>
<tr>
<td>8. Encourage urban renaissance and improve efficiency of land use through an increase in the use of brownfield sites</td>
<td>% of new housing developed on previously developed land</td>
<td>Annual, through AMR</td>
<td>Mki, annual</td>
</tr>
<tr>
<td>9. Continue to maintain and improve local air quality and limit noise pollution</td>
<td>Number of air quality management zones, Rate of noise complaints per 1000 population</td>
<td>Annual, through Updating and Screening Assessment</td>
<td>MKC Environmental Protection Team, annual, MKC, neighbourhood Complaints, annual</td>
</tr>
<tr>
<td>10. Tackle climate change by reducing the emissions of greenhouse gases</td>
<td>CO2 emission (in tonnes) per capita, % of CO2 emissions generated by a) Industry and Commercial; b) Domestic; c) Road transport</td>
<td>Annual, using latest population forecast</td>
<td>SECCP Calculator, MKC, DEFRA Emissions of carbon dioxide for local authority areas, annual</td>
</tr>
<tr>
<td>11. To reduce road congestion and support a modal shift towards more sustainable modes of transport</td>
<td>Number of bus journeys per year, Levels of car and van ownership, Satisfaction with local bus services</td>
<td>Annual</td>
<td>BVPI 102, annual, BVPI 104, Census, 2011.</td>
</tr>
<tr>
<td>12. To conserve and enhance Milton Keynes’ biodiversity</td>
<td>Number of local wildlife sites, Number of Milton Keynes Wildlife Sites</td>
<td>Annual</td>
<td>MKC, MKi, ongoing, MKC, MKi, ongoing</td>
</tr>
<tr>
<td>Task</td>
<td>Description</td>
<td>Key Performance Indicators</td>
<td>Frequency</td>
</tr>
<tr>
<td>------</td>
<td>-------------</td>
<td>----------------------------</td>
<td>-----------</td>
</tr>
<tr>
<td>13.</td>
<td>Conserve and enhance the boroughs cultural heritage</td>
<td>Number of conservation areas</td>
<td>MKC, MKi, ongoing</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Number of buildings on the ‘at risk’ register</td>
<td>English Heritage, annual</td>
</tr>
<tr>
<td>14.</td>
<td>To maintain and improve the boroughs water quality and reduce the risk of flooding</td>
<td>% of river lengths assessed as good biological quality</td>
<td>Audit Commission, annual</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Biological and chemical water quality (General Quality Assessment Scheme)</td>
<td>Environment Agency, annual</td>
</tr>
<tr>
<td></td>
<td></td>
<td>No. of planning permissions granted contrary to the advise of Environment Agency</td>
<td>Not currently collected.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Amount of development permitted in flood risk areas (in ha)</td>
<td>Information and Monitoring, as required</td>
</tr>
<tr>
<td>15.</td>
<td>Reduce the generation of waste and support sustainable waste management</td>
<td>% of waste landfilled</td>
<td>BVPI 82d, annual</td>
</tr>
<tr>
<td></td>
<td></td>
<td>% of waste recycled</td>
<td>BVPI 82a, annual</td>
</tr>
<tr>
<td></td>
<td></td>
<td>% of waste composted</td>
<td>BVPI 82b, annual</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Cost of waste collection per household</td>
<td>BVPI 84, annual</td>
</tr>
<tr>
<td>16.</td>
<td>Increase energy efficiency and encourage the use of renewable sources of energy</td>
<td>Average SAP rating of authority dwellings</td>
<td>BVPI 63, annual</td>
</tr>
<tr>
<td></td>
<td></td>
<td>% of domestic improvements in energy efficiency</td>
<td>Home Energy Conservation Act 1995 Progress Reports, annual</td>
</tr>
<tr>
<td></td>
<td></td>
<td>% of heat, power and other energy recovered</td>
<td>BVPI 82c, annual</td>
</tr>
<tr>
<td>17.</td>
<td>Ensure high and stable levels of employment, allowing all residents to benefit from economic growth</td>
<td>Unemployment rate</td>
<td>MKi, monthly</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Percentage of Working Age based on total population</td>
<td>NOMIS, mid year population estimates, annual</td>
</tr>
<tr>
<td></td>
<td></td>
<td>% of population claiming Jobseekers Allowance (JSA)</td>
<td>NOMIS, quarterly</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Employment rate of those with the lowest qualifications</td>
<td>Government Floor Targets</td>
</tr>
<tr>
<td>18.</td>
<td>Sustain economic growth and competitiveness across the region</td>
<td>Economic productivity (GVA per capita)</td>
<td>ONS</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Qualifications of working age population</td>
<td>MKi/DFES, annual</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Gross weekly pay of full-time workers (by place of residence)</td>
<td>Annual Survey of Hours and Earnings, annual</td>
</tr>
<tr>
<td>19.</td>
<td>Improve the vitality and viability of town and local centres</td>
<td>Investment in public realm improvements</td>
<td>Not currently collected, S106 database as source</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Amount of completed retail, office and leisure development in town centres</td>
<td>ECMS database</td>
</tr>
</tbody>
</table>
## 12. Task B6 Proposals for monitoring the significant effects of implementing the Core strategy

<table>
<thead>
<tr>
<th>Number of regeneration projects within the borough</th>
<th>Not currently collected—could be based on publication of regeneration strategy and delivery of specific elements</th>
<th>Annual MKi (through the small business service)</th>
</tr>
</thead>
<tbody>
<tr>
<td>20. Encourage creation of new businesses and support development of a knowledge-based economy</td>
<td>Business survival rate</td>
<td>Annual Government Floor Targets</td>
</tr>
<tr>
<td>Enterprise: VAT registrations per 10000 adults</td>
<td>MKi (through the small business service)</td>
<td>Annual Government Floor Targets</td>
</tr>
<tr>
<td>Annual</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
13 Task D1 Public participation on the Preferred Options of the Core Strategy and the SA Report

13.1 The Core Strategy Preferred Options document was published for consultation in September 2007. This was accompanied by the Sustainability Appraisal report. Appendix 14 summarises the comments received specifically in respect of the SA Report at Preferred Options stage and sets out Officer responses to those comments. Some comments on the SA report have been received as part of a wider response to the Preferred Options document and have not been included in Appendix 14 in Technical Document 4. Reports on the main outcomes of the Preferred Options consultation are available from http://miltonkeynes-consult.limehouse.co.uk/portal/dev_plans/core_strategy/cspo_sept07/cs_po_sep07
13. Task D1 Public participation on the Preferred Options of the Core Strategy and the EA Report
14 Task D2 Appraising significant changes

Pre-Submission Document Appraisal

14.1 Following consultation on the Preferred Options report, the Council began drafting the Pre-Submission version of the Core Strategy. This process involved incorporating comments received from stakeholders in response to the Preferred Options consultation, internal consultation with other officers, and a series of meetings of the Local Development Framework Advisory Group where Members provided comments on the draft Pre-Submission document.

14.2 The Council has now prepared the Core Strategy Pre-Submission Document. At this stage, in accordance with government guidance, further sustainability appraisal is only required where the document contains strategy that has significant impacts which have not previously been appraised. Where there has been no significant change, no further appraisal is required. Once the Pre-Submission Core Strategy was approved by Cabinet and Full Council the Pre-Submission Core Strategy document was assessed to see if there had been any significant changes to Core Strategy policy since the preferred options document that would require further appraisal.

14.3 The assessment of the policies has been undertaken to ensure that:

1. Preferred Policy Directions were carried over to Pre-Submission
2. The policy emphasis has not significantly changed in terms of the strategic sustainability outcomes
3. The SA recommendations have been taken on board in the Pre-Submission document.
4. No significant changes have been made or new policies introduced that have not previously had their outcomes appraised.

14.4 The assessment of the policies involved two distinct stages. Firstly the Preferred Policy Directions (PPD) from the Preferred Options Report were assessed to ensure that they were carried over into the Pre-Submission document and where they had been included. This assessment included a certain level of judgement as in some cases the exact wording had been carried over into the Pre-Submission document but in others it had been amended, whether to improve clarity, or to add detail as a result of SA recommendations, public consultation responses or to reflect the latest version of the South East Plan.

14.5 Following this process a final audit of the Pre-Submission policies was undertaken. This audit process highlighted which PPD the Pre-Submission policy had come from. Where a policy direction had changed a judgement had to be made as to whether this was considered "significant" and could therefore have significant implications for the sustainability outcomes of the policy. Where it was considered that the policy had altered since the Preferred Options stage to the extent that it could have different sustainability outcomes to the Preferred Options Sustainability Appraisal Report findings then further appraisal work has been undertaken. The tables in Technical Document 4 Appendix 24 show the Pre-Submission Policy with references to the PPDs to which it relates, how the policy has changed since the Preferred Options, what the sustainability implications of the changes made are and whether these are considered sufficiently significant as to require further appraisal work.

14.6 The assessment process revealed a number of changes to the Core Strategy since consultation on the Preferred Options. The most obvious change related to the structure of the Pre-Submission Core Strategy. Since the Preferred Options Report the policies in the Core Strategy Pre-Submission Version have undergone considerable change in terms of the format of the document. This is due to the restructuring of the document from one based on broad themes, to a more area and topic based approach. This has led to a more logical Pre-Submission document but also means that a number of Preferred Policy Directions have been amalgamated to form a single Pre-Submission policy and PPDs being split into a number of different Pre-Submission policies.

14.7 The table below summarises the assessment process.
### Policy | Relevant PPD | How changed | Further appraisal required?
--- | --- | --- | ---
CS1 Milton Keynes Development Strategy | - Growth for the City - Strategy for the Rural Area | Policy CS1 is a new policy reflecting the content of Preferred Policy Directions “Growth for the City” and “Strategy for the Rural Area”. It summarises where development will take place across the Borough. A settlement hierarchy has been introduced to summarise the focus of development and provides more detail than the Preferred Options Report. A reference to “Small scale redevelopment and infill development will be permitted in the 'Other Villages' with a development boundary” has been included in the Pre-Submission policy. | Policy CS1 is a summary of the development taking place in the borough. The policy now provides greater detail through the inclusion of a settlement hierarchy. The reference to “Small scale redevelopment and infill development will be permitted in the 'Other Villages' with a development boundary” was not included in any PPD and it is considered an appraisal of this approach is required. See CS 9 Strategy for the Rural Area for further details. |
CS2 Housing Land Supply | - Growth for the City | The policy provides more detail and contains a number of relatively minor changes to the housing numbers for different areas of the Borough. This is in order to ensure that the Pre-Submission Core Strategy reflects the numbers within the final South East Plan. | The changes to housing numbers between the Preferred Options report and the Pre-Submission version of the Core Strategy are relatively minor. The Pre-Submission policy does not introduce any new policy directions or options that were not considered through the MK2031 work. However, following the publication of the Secretary of States Proposed Changes to the South East Plan which introduced land east of the M1 as a new Strategic Development Area further appraisal work was undertaken to assess the sustainability implications. Part of this work involved re-appraising the growth locations based on the current housing numbers. The appraisal is shown in full in Appendix 18 of Technical document 4. Land east of the M1 was subsequently dropped from the final South East Plan and is not included the Pre-Submission Core Strategy. |
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<th>Policy</th>
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<tr>
<td>CS3 Employment Land Supply</td>
<td>- ESRR1</td>
<td>Three points regarding the protection of employment land from change of use, the density of development and a planned lower growth rate for warehouse and logistics uses, have not been carried forward into the Pre-Submission policy. The point regarding density is covered in Pre-Submission Policies CS 3 and CS 11. The point relating to warehouse and logistics uses is covered in the background text to Policy CS 3. The point regarding protection of employment land from a change of use is covered in the delivery section to Policy CS 3, which states that the Development Management DPD will contain a criteria based policy against which changes of use away from employment use will be assessed. A number of criteria have been introduced. These provide additional detail on reviewing the policy, achieving a range of sites and taking into account the site location in the granting of planning permission.</td>
<td>The sustainability implications are minimal. Though some of the points from the preferred policy direction have not been carried forward directly into this policy, the points are all covered elsewhere in the document, also the Pre-Submission policy contains additional detail on employment land availability which helps to provide clarity. It is considered that the overall outcome, however, has not changed and there are, therefore, no sustainability implications.</td>
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<td>- MI7</td>
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<td></td>
<td>- ESRR4</td>
<td>The main preferred option policy which the Pre-Submission policy has evolved from is ESRR4, which has been split between this policy and CS7. CS4 concentrates on retail and leisure development and has been updated with the completion of the Retail Study to provide the Council’s strategy on retail and leisure development. In the preferred options document, the Retail Study had not been completed and therefore it was simply stated that future decisions will be based on the Retail Study.</td>
<td>The Pre-Submission policy has included a lot of additional detail compared to the preferred policy direction and it is therefore considered that the policy should be appraised. <strong>Further appraisal required</strong></td>
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<td>- MI7</td>
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<td>- Growth for the City</td>
<td>The principle of development to the south east of the city was established as part of the MK2031 work and has been subsequently re-appraised through the Core Strategy (see Policy CS2).</td>
<td>It is considered that in general, the changes made to the PPDs are adding greater detail and reflect the fact that the policy is specific to the South East SDA area as opposed to the general principles of the PPDs. The safeguarding of the proposed alignment of the</td>
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<td>- MI1</td>
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<td>- MI2</td>
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<td>Policy CS5 sets out what the Council seeks to achieve in the SDA. As a result the policy draws upon a wide range of Preferred Policy Directions and in some cases repeats other CS policies. It also provides more location specific requirements. New additions not included in Preferred Policy Direction are as follows:  - Safeguard the proposed alignment of the Bedford to Milton Keynes waterway  - Safeguard land for a future bridge over and/or junction with the M1 (J13a)  - Provide residents and businesses with access to a high quality telecommunications and ICT network The introductory text is also new, explaining how the SDA will be delivered through the planning process through a Development Framework, development briefs and design codes. The policy also cross references the Core Strategy objective of delivering 1.5 new jobs for every new dwelling which was not previously set out in a PPD.</td>
<td>Bedford to Milton Keynes Waterway is an existing Local Plan policy approach. It is considered that there are no significant strategic sustainability implications arising from the changes and no further appraisal is required. The need to provide residents and businesses with a high quality telecommunications network was not included in any PPD. It is likely that such a requirement will lead to a number of social, environmental and economic sustainability benefits, increased home-working, improved accessibility, reduced need to travel etc. However, in terms of the overall policy outcome, the additional wording is not considered significant enough to require additional appraisal work.</td>
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<tr>
<td>CS6 South West Milton Keynes Strategic Development Area</td>
<td>- MOA1</td>
<td>The principle of development to the south west of Milton Keynes, entirely in Aylebury Vale District came from the preferred option policy – growth for the city. The Pre-Submission policy contains a lot more detail than the preferred option policy, but this detail has not been introduced as new material to the document. The detail has come from a number of the other preferred options policies and has been combined to form a policy for this SDA. Other parts of the policy, which were not specifically in any of</td>
<td>This more detailed policy adds to the sustainability by ensuring that necessary issues and uncertainties relating to the SDA are resolved prior to its development in order to minimise any negative impacts that it could potentially have on the Borough. The policy now provides greater detail and it is considered the changes would not have significant sustainability implications. It should be noted that</td>
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<td>CS7 Central Milton Keynes</td>
<td>ESRR2 - ESRR4 - MI7 - NC1 - NC6</td>
<td>This policy is based on preferred option policy direction ESRR4. The retail aspects of this policy have gone into Policy CS7. Additional details such as providing pedestrian friendly spaces and offering an attractive urban living environment have been added to the policy. This had made the policy more CMK specific and relates to the differing objectives for CMK as opposed to other areas of the Borough.</td>
<td>The additional detail of the policy has been appraised through the relevant PPDs. It is considered that the amendments are unlikely to have significant sustainability implications.</td>
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<tr>
<td>CS8 Other Areas of Change</td>
<td>Growth Strategy - SEC3 - SEC4 - SEC5</td>
<td>This policy is a combination and further explanation of the growth strategy planned for urban Milton Keynes as well as Preferred Options Policy SEC3 regarding regeneration opportunities. Regarding housing numbers for urban Milton Keynes, the presentation of these figures has evolved from the Preferred Options due to the evolving South East Plan. Specific additions include the reference to the Growth Strategy Table 5.2, which sets out what and where growth is planned in greater detail and draws on the area based Policies CS5, CS6, CS7, CS8 and CS9. Growth and regeneration for Wolverton and Bletchley was set out in the growth PPD. This was drawn from existing commitment expressed through regeneration strategies and development sites included in the Local Plan. Consultation responses and input from Members raised the need to have a stronger reference to these strategies and commitments in the Pre-Submission document.</td>
<td>The overall growth strategy was re-appraised as it had changed, through revisions to the South East Plan, from the strategy that was appraised as part of the MK2031 process. This is contained in Technical Document 4. It is considered that the specific changes to the policy have not added any significant new policy directions but have been expanded from the brief policy directions in the Preferred Options. Detail has now been added to where and how regeneration will take place.</td>
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| CS9 Strategy for the Rural Area | - Strategy for the Rural Area     | Additional detail has been added to the Pre-Submission policy regarding the reuse of rural buildings for employment purposes as a result of an SA recommendation to allow for employment opportunities in rural areas. Reference to infill development and conversions in villages with development boundaries and the protection of rural facilities has also been added. | It is considered that it would be appropriate to reflect this additional detail by reviewing the appraisal undertaken for the preferred policy direction. The results of this appraisal are shown in an amended Appendix 20.

**Further appraisal required** |

| CS10 Housing | - Growth for the City  
- MI2  
- MI3  
- NC1  
- NC3  
- NC4  
- SEC2 | The policy contains elements from several preferred options policy directions above combined into one policy covering housing need, housing design and affordable and specialist housing. Many of the issues such as sustainable construction, design and transport are covered in separate specific policies. It was considered that the elements that affect housing should be drawn together into one single policy. The main issues that are contained entirely within this policy are the need to provide a variety of tenures and planning for housing need. This policy provides hooks for further specific affordable housing and traveller policies to be set out in the forthcoming Development Management DPD. | It is not considered that the change in actual outcomes from three additions to the preferred options is significant enough to justify an entire re-appraisal of the policy. However, the benefits of the sustainability impacts of these additions are set out below:

- Supporting ICT connectivity and home working will have sustainability benefits in reducing the need to travel and attracting business and future residents to the city.
- While the policy supports adequate car parking in new residential areas, exact standards will be set out in future reviews of the Parking... |
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<td>CS11 A Well Connected Milton Keynes</td>
<td>- NC1&lt;br&gt;- NC4&lt;br&gt;- MI7</td>
<td>The policy has additional detail about how an improvement in providing alternatives to travelling by car will be achieved and includes some of the specific infrastructure requirements. Some of this detail was contained specifically in the infrastructure section of Chapter 10 of the Preferred Options report. The policy also introduces a requirement for grid roads to be extended into new development areas.</td>
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<tr>
<td>CS12 Developing Successful Neighbourhoods</td>
<td>- MI1&lt;br&gt;- MI4</td>
<td>This policy draws together the key services, facilities and location requirements to create sustainable communities. This is primarily a combination of Preferred Options policy directions MI1 and MI4.</td>
<td>It is not considered that the change in actual outcomes from three additions from the preferred options is significant enough to justify an entire appraisal. The additional detail relating to MK specific actions (redways, sites for park and ride, SE SDA developments, grid roads) is not considered to have altered the policy direction or the sustainability outcome but does provide more detail specific to Milton Keynes and some was included in Chapter 10 of the Preferred Options report. Therefore it is considered that for these additions there is likely to be no significant strategic sustainability implications arising from these changes and no further appraisal is required. Consideration should be given through the SE SDA SPD as to how best incorporate grid roads whilst achieving the wider aims of the Core Strategy to encourage sustainable travel.</td>
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### Policy: Further appraisal required?

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| - MI7  | - M18        | NC1, with additional input from other directions. It was considered that these key points should be drawn together in one policy as well as in policies covering specific topics, such as transport and open space. The three additions from the Preferred Options are creating private amenity space for houses, encouraging home working and the additional detail of designing SUDS as part of open space provision. | re-appraisal of the policy. However, the benefits of the sustainability impacts of these additions are set out below:  
- Creating high quality private amenity space will increase the quality of life for residents while providing important spaces for biodiversity.  
- Encouraging home working will reduce the need for travel and can allow for an improved work/life balance  
The need for surface water drainage systems was stressed in PPD MI4 and the background text states that SUDS can also contribute to the amenity and wildlife value of a site. Creating SUDS schemes as part of open space provision builds on these. |
| - MI8  | - NC6        | - ESR5 - NC1 - NC4 - MOA2 |
| - NC6  | - ESR5 - NC1 - NC4 - MOA2 |
| - ESR5 | - NC1 - NC4 - MOA2 |
| - NC1  | - NC4 - MOA2 |
| - NC4  | - MOA2 |
| - MOA2 | |

### CS13 Ensuring High Quality, Well Designed Places

In the Preferred Options document there was no specific policy on the design and form of new communities and developments. However, design elements were included in other specific policy directions as outlined above, particularly NC 1. These elements have now been drawn together into Policy CS13, with some additional points. This was recommended in the SA of the Preferred Options where it was stated that measures need to be included to secure effective design principles. Therefore the policy has been appraised against the SA objectives and the analysis is contained in Appendix 21.

The policy has been appraised as a specific design policy was not included in the Preferred Options document.

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<td>- M12</td>
<td>- M14 - M17 - MOA1 - MOA2 - NC6 - NC4 - NC1</td>
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14. Task D2: Appraising significant changes
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<tr>
<td>CS14 Sustainable Construction</td>
<td>- MI2</td>
<td>The policy is an amalgamation of Preferred Policy Directions MI2 and MI3. The PO appraisal recommended the consideration of the deliverability of set targets. As a result the report “Targets for renewable energy generation and energy efficiency in new developments in Milton Keynes” Impetus (2008) was commissioned which examined the viability of different targets. These findings have been incorporated into the Pre-Submission policy in accordance with the SA recommendation and the policy now has additional detail on targets and thresholds. The policy retains the requirement for contributions to be made to the carbon offset fund.</td>
<td>It is considered that there are no significant strategic sustainability implications arising from the changes to the policy. Although the Pre-Submission policy no longer refers to “all” new development meeting targets, the policy has benefited by the setting of achievable targets with additional guidance for different locations. It is therefore more likely to be achieved than setting generic targets. No further appraisal work is therefore required.</td>
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<tr>
<td>CS15 Community Energy Networks and Large Scale Renewable Energy Schemes</td>
<td>- MI1</td>
<td>The policy is an amalgamation of Policies MI1, MI2 and MI3 from the Preferred Options document to encourage community energy networks and renewable energy schemes. Additional detail has been added by including a threshold to which community energy network requirements will be applied as recommended during the PO appraisal. The wording is stricter with regard to renewable energy schemes as it now requires them to demonstrate that there would not be any negative social, economic or environmental impacts, as opposed to the PPD which required the demonstration that any impacts would be acceptable.</td>
<td>The policy direction would help to deliver sustainability objectives in all three sections (environmental, social and economic). There are areas of uncertainty around the impacts on landscape character, biodiversity and cultural heritage protection. These will depend on the locational specifics of proposals and mitigation measures.</td>
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<tr>
<td>CS16 Delivering Economic Prosperity</td>
<td>- ESRR2</td>
<td>In addition to the support given to education establishments in the preferred options policy, the Pre-Submission policy supports training facilities in general with the aim of helping sections of the community that are disadvantaged in the labour market. The Pre-Submission policy also supports the development of knowledge related businesses and the establishment of new</td>
<td>The additional information helps to increase the sustainability of the policy with particular support for those members of the community disadvantaged in the labour-market and encouragement of knowledge based businesses. The additional point regarding broadband could help to reduce travel. The point</td>
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<td>CS17 Supporting Small Businesses</td>
<td>- ESRR3</td>
<td>The policy is very similar to the preferred options policy ESRR3. As a result of one of the Sustainability Appraisal recommendations, the Pre-Submission policy has the additional point: “Encouraging developers to provide live/work units in new development”. During drafting of the document for approval the point “we will seek to stimulate a range of services and facilities appropriate to small businesses” was also added.</td>
<td>The sustainability has improved slightly with the additional point which encourages live/work units because it provides adaptability and may contribute to a reduction in CO₂ emissions through a reduced need for travel. The addition of the point relating to services and facilities is not considered to have any sustainability implications.</td>
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<tr>
<td>CS18 Improving access to local services and facilities</td>
<td>- SEC1 - MI7</td>
<td>The policy has drawn together the protection of existing facilities in SEC 1 with additional elements. The element regarding re-use of existing buildings for community uses was not included in the Preferred Options. This was included after a consultation response on the Preferred Options. This proposal would increase the likelihood of more locations coming forward for service provision, even if in a temporary form, rather than just relying on co-location or bespoke facilities.</td>
<td>It is considered that the additional elements are unlikely to significantly change the outcomes of the policy but do provide additional detail. However, due to the number of additions, the policy has been re-appraised.</td>
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In addition, the Pre-Submission policy includes “the development of sites to support major sporting and cultural events” which has come from other preferred policy directions. Finally, three more points have been added that have been included during redrafting of the document. The additional points are:

- “The delivery of a substantial number of primary schools and secondary schools as part of growth plans”
- “Improved broadband/high-speed internet access across the whole Borough”
- “Services to support inward migration of employers and employees and investment to facilitate it.”

regarding support for inward migration of employers and employees could help to boost the economy and provide employment opportunities. The point regarding schools is an addition to the policy in order to support the shift to a knowledge based economy with a high skilled workforce. It is considered that this addition is unlikely to have significant sustainability implications and no further appraisal is required.

The delivery of a substantial number of primary schools and secondary schools as part of growth plans is an addition to the policy in order to support the shift to a knowledge based economy with a high skilled workforce. It is considered that this addition is unlikely to have significant sustainability implications.
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<td>People with disabilities were not specifically mentioned in Preferred Options but were included in the general theme of improving accessibility for all. This was stressed throughout the Preferred Options throughout the document. Improved access by public transport was stressed in PPD MI7. However, there was no specific mention of students</td>
<td>It was felt important to state in the policy that the planning-related departments work with the Council's Emergency Planning department. This is a process that is already put in place in case of emergencies. Overall the policy is now more deliverable than in the Preferred Options as the relevant programmes and delivery organisations have been identified and involved. However, it is not considered that re-appraisal of the policy against the sustainability objectives is warranted as the additions add detail to the policy but don't significantly alter the outcomes.</td>
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<td>CS19 Healthier and Safer Communities</td>
<td>MOA2, NC1, SEC4, NC6, NC4</td>
<td>The first part of Policy CS 19 echoes the regeneration theme of CS 8 but also focuses specifically on health inequalities in these areas. This is drawn from PPD SEC4 and combined with NC6 to create a policy that also focuses on reducing crime and creating safer places across the city. While the wording of these elements has slightly changed from the Preferred Options, there are no additional or lost policy outcomes. One new element have been added to the Pre-Submission policy. This is working with Emergency Planning department</td>
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<td>CS20 The Historic and Natural Environment</td>
<td>MOA1, NC1, MOA3, MOA4, ESRR4, ESRR5, MI4</td>
<td>The Pre-Submission policy has largely been formed from preferred options policies MOA1, MOA2, MOA3 and MOA4, which have all been combined into this one policy. Some of the points within the preferred options policies have been removed from the policy itself but are picked up by the background text and delivery section. As an addition to the preferred option policy directions, the Pre-Submission policy includes the protection and enhancement of 20th century New Town architecture.</td>
<td>As the preferred options policies have been carried forward, albeit in a slightly different format, there are minimal implications in terms of sustainability. With the extension of protection and enhancement to 20th century New Town architecture, the sustainability of the policy could be seen to have improved slightly.</td>
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<td>CS21 Minerals</td>
<td>- MI6</td>
<td>The PPD MI6 Managing Mineral Reserves set out a general approach to minerals. Since the publication of the Preferred Options report the Council (with the agreement of GOSE) has decided not to develop the Minerals policy further and will instead produce a Minerals Core Strategy and a Minerals Sites and Policies DPD. The Pre-Submission policy now sets out the scope of the future DPDs. It should be noted that Minerals issues are linked to other Pre-Submission policies such as CS20 and future DPDs will need to take these policies into account.</td>
<td>Policies for Minerals will be addressed through the Minerals Core Strategy and Minerals Sites and Policies DPD and will be subject to Sustainability Appraisal throughout their production. <strong>No further appraisal required</strong></td>
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<td>CS22 Delivering Infrastructure</td>
<td>- NC5 - SEC6 - SEC5</td>
<td>CS21 draws on the policy directions NC 5 and SEC 6. The delivery detail has altered from Preferred Options as to how and when infrastructure will be delivered. CS22 states how and by what mechanisms infrastructure will be delivered and also refers to the MKP Local Investment Plan, where the infrastructure requirements are listed and will be updated annually. Infrastructure required for balanced growth and successful new communities was stated in NC5 and SEC5 and this is carried through in background text as well as other delivery policies in the Pre-Submission document.</td>
<td>It is considered that there is no change in the outcomes of policies from the preferred options, so therefore a re-appraisal of the policy is not required. There are no additional implications that affect the original sustainability conclusions drawn from the preferred policy direction.</td>
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As the summary table above shows, the preferred options have generally been carried over into the Pre-Submission core strategy, albeit no longer in their original structure. Most PPDs have had some wording amendments, been re-worded or had additional detail added to them. In most cases it was considered that this would not fundamentally change the outcome of the PPDs assessed at the Preferred Options stage. Detailed assessment of how each PPD has been carried over is in Technical Document 4 Appendix 23.

However, the process highlighted the need for further appraisal work in the following policy areas:
- Policy CS 4 Retail and Leisure Development
- Policy CS 9 Strategy for the Rural Area
- Policy CS 13 Ensuring High Quality, Well Designed Places
- Policy CS 18 Improving Access to Local Services and Facilities

In addition to these Pre-Submission policies, the objectives have also been significantly altered since the Preferred Options report was consulted on and have therefore been re-appraised for compatibility with the SA objectives.

**How SA Recommendations have been incorporated into the Core Strategy**

At the preferred options stage, a number of recommendations were made in the sustainability appraisal for how to improve the sustainability of individual preferred policy directions and the Core Strategy document as a whole. The auditing process has shown that the majority of recommendations have been incorporated into the Pre-Submission document, for example, targets based on deliverability and have been introduced to CS14, there is now a policy for safer communities, and there have been a whole range of additions to policy text to help improve the sustainability of policies.

Technical Document 4 Appendix 23 provides a full list of the SA recommendations for each preferred policy direction and shows how they have been incorporated into the Pre-Submission document.

**Core Strategy Objectives**

The objectives of the Pre-Submission Core Strategy have been heavily re-worded and re-organised since the Preferred Options stage. This was required so that they complied with SMART principles and to reflect the revised spatial vision. It is considered that the outcomes of the objectives have not significantly changed but that they are more focused on specific delivery areas.

It was therefore considered necessary to re-appraise task B1 – Testing the Core Strategy objectives against the SA Framework. The compatibilities and conflicts between the objectives are shown in with analysis and detailed findings are set out in Technical Document 4 Appendices 16 and 17. The numbers within table 14.1 refer to conflict notes in Appendix 17.

Overall the picture does not differ from the analysis carried out at the Preferred Options stage. The level of growth planned for Milton Keynes, while having positive sustainability benefits for social and economic objectives, does clash with some of the environmental objectives of the SA framework. This is because much of the planned growth will be located on what is currently greenfield land. With over 40,000 additional homes there will be an inevitable worsening of air quality over the baseline situation as well as an increase in gross CO₂ emissions and overall traffic levels. However, other Core Strategy objectives seek to minimise these impacts by ensuring that development is sited, designed and functions in a more sustainable manner than has been achieved in the past. Thus the strategy seeks to minimise the level of specific environmental disturbance caused by growth whilst promoting other social, economic and environmental objectives.
### Table 14.2

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<th>Core Strategy Objectives</th>
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**Key**

- **Areas of compatibility**
- **Areas of potential conflict**
- **Areas of potentially less significant conflict**
- **No particular interaction**

### Growth Strategy

**14.16** Between the consultation on the Preferred Options and the finalisation of the Pre-Submission Core Strategy, the Secretary of State’s Proposed Changes to the South East Plan (July 2008) and subsequently the final South East Plan (May 2009) were both published. In response to these plans interim work was undertaken in-house to appraise potential impacts on the Core Strategy.

**14.17** The Secretary of State’s Proposed Changes introduced a requirement for an additional SDA in Milton Keynes, located East of the M1. In response to this, further appraisal work was undertaken to assess the sustainability implications ([Technical Document 4 Appendix 18](#)). Although this appraisal work showed that the SDAs performed similarly in achieving the SA objectives, scoring well in social and economic impacts and poorly in environmental...
impacts, the Final South East Plan (May 2009) removed the requirement for an additional SDA. Consequently the additional SDA east of the M1 has been allocated in the Pre-Submission Core Strategy. As a result, no recommendations are made in this SA in relation to this.

<table>
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<th>Stage</th>
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<tr>
<td>SEP SofS Proposed Changes</td>
<td>Provide 34,160 dwellings within the existing city,</td>
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<td>4800 dwellings to the south east</td>
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<td>5600 dwellings east of the M1</td>
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<td>and 2,400 in the rural area.</td>
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<tr>
<td>SEP Adopted</td>
<td>Provide 34,160 dwellings in and around the Milton Keynes urban area,</td>
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<td>4,800 dwellings to the south-east</td>
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<td>and 2,400 dwellings in the rural area/rest of Milton Keynes.</td>
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<tr>
<td>Pre-Submission Core Strategy</td>
<td>Provide 34,160 dwellings in and around the urban area (including 2,500 dwellings in the strategic reserve areas located within the SE SDA boundary),</td>
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<td>4,800 dwellings in the SE SDA,</td>
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<td>and 2,400 in the rural area.</td>
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14.18 Undertaking this interim work allowed for the re-appraisal of the growth for Milton Keynes using the latest housing numbers which had changed since the MK2031 and Preferred Options reports. The appraisal work includes the revised housing numbers for the proposed changes and then assesses the Pre-Submission Core Strategy growth proposals which meet the requirements of the South East Plan. A summary of the appraisal is shown below.

14.19 Although the South West SDA is not within the Milton Keynes administrative boundaries and is to be allocated through the Aylesbury Vale Core Strategy, it has been referenced in the appraisal work for consistency with the MK2031 work and to allow consideration for potential impacts on Milton Keynes and the Bletchley area in particular. Development in Bedfordshire is subject to inclusion in the Central Bedfordshire Local Development Framework and the East of England Plan.
Summary of Growth Appraisal

The re-appraisal of the Pre-Submission growth policy has shown that the proposals would be compatible with many of the SA objectives. However, due to the level of growth, and the amount of development on greenfield sites, the Pre-Submission policy has mostly negative scores on the environmental SA objectives. However, the policy has been developed to mitigate the environmental impacts of growth through such policy initiatives as creating habitats in new development, encouraging modal shift, reducing the need to travel and requiring energy efficient homes. Environmental impacts will also be a major consideration in defining the exact locations of development within the South East SDA.

The social and economic outcomes are considered to be largely positive with opportunities to provide affordable homes, social infrastructure and new jobs.

Overall, the findings of the additional Pre-Submission policy appraisal work are similar to those of the MK2031 study with social and economic benefits but negative environmental impacts that will require mitigation through the implementation of the Core Strategy policies.

14.20 The full findings of this further appraisal are shown in Technical Document 4 Appendix 18.

Dwellings to Jobs Ratio

14.21 The Preferred Options Report included reference to the provision of new jobs at a ratio of 1 new job for every new dwelling built. The Pre-Submission Core Strategy now refers to the objective of creating 1.5 new jobs for every new dwelling constructed, which reflects past trends. The ratio is not explicitly set out in a policy, other than CS5 which states the need to meet the relevant Core Strategy objective, nor is it a direct policy requirement, but more a tool for monitoring the Core Strategy. However, it was considered that the change in the ratio could have sustainability implications; a comparison of the 1:1 and the 1:1.5 dwellings to jobs ratios was therefore undertaken. A summary of the comparison is set out below.

Both options would provide economic benefits with the 1:1.5 ratio generally scoring better due to the increased target which will result in a greater number of jobs. In environmental terms, both options score negatively but these negative environmental impacts are more pronounced under the 1:1.5 ratio; road congestion and air pollution are likely to be worse for example. Both options would have limited social impacts although they could help achieve SA objectives on reducing poverty and social exclusion.

14.22 The full findings are shown in Technical Document 4 Appendix 22.

Policy CS 4 Retail and Leisure Development

14.23 Pre-Submission Policy CS 4 Retail and Leisure Development has largely been carried over from ESRR4 with an element of MI7. However, ESRR4 stated that future decisions on retail capacity in Central Milton Keynes and elsewhere would be based on the findings of the Retail Capacity Study. The Retail Capacity Study has now been produced and the findings have been represented in the Pre-Submission Policy CS4. The policy now includes details of the retail strategy for MK including a more spatial element. This detail could be considered as a significant change and therefore the appraisal of PPD ESRR4 has been updated with the additional detail. A summary conclusion is set out below.
The policy has a number of positive sustainability effects, particularly social and economic. Social benefits include: increased street surveillance and reduced associated risk/fear of crime, and improved access to services and facilities. Economic benefits include increased economic growth and competitiveness, an increase in job opportunities, and improved vitality and viability of the district and town centres. In terms of environmental impacts the policy direction has some negative impacts as well as positive. Overall, in terms of environmental impacts, traffic congestion is likely to increase, there will be some Greenfield development, there is likely to be a minor impact on biodiversity and landscape character, and the level of waste produced is likely to increase. More positively, there may be an increase in the viability of public transport and there may be opportunities to increase energy efficiency and the use of renewables.


Policy CS 9 Rural Area Strategy

14.25 The auditing process has shown that the "Strategy for the Rural Area" Preferred Policy Direction was not appraised at the Issues and Options or the Preferred Options stage. Options for the rural area were set out in the Core Strategy Preferred Options: Rural Area Spatial Options Technical Background Paper (June 2007) with Option 1 being taken forward to form the preferred option. As a result of these omissions, both the options and the preferred option have since been appraised and recommendations made where appropriate.

14.26 The Pre-Submission policy has subsequently been developed from the preferred policy direction and included in the audit process. The audit identified that although Pre-Submission policy CS9 was a direct translation of PPD Strategy for the Rural Areas, some additional detail had been added to the policy that had not been previously appraised. This additional detail introduced reference to infill development in rural settlements with development boundaries and support for rural employment opportunities. The PPD appraisal has therefore been updated to reflect this additional detail as it could have had sustainability implications. A summary of this updated appraisal is shown below.

The policy has positive sustainability benefits particularly in relation to preserving and expanding the provision services and facilities in rural communities, including public transport. By allocating an appropriate amount of development in key settlements and selected villages, prioritising brownfield sites, the environmental impacts of development should be minimised. New developments will also have to meet the same affordable housing requirement as urban developments providing much needed affordable units in locations where housing affordability is an issue.

14.27 The full appraisal findings are shown in Technical Document 4 Appendices 19 and 20.

Policy CS 13 Ensuring High Quality, Well Designed Places

14.28 In the Preferred Options document there was no single PPD for design (although elements of design were touched upon in numerous PPDs). Through the audit process it became apparent that as the policy had been derived from so many different PPDs it essentially formed a new Pre-Submission policy and should be appraised as a significant change. The summary conclusion is set out below:

The policy promotes positive design principles which should minimise the impact on the environment from large new developments. Well designed communities will have many positive impacts towards social objectives, such as reducing crime and promoting healthier, more active lifestyles. The impacts on economic objectives are less, with the only indirect effect being on existing town, district and local centres.
14.29 The full appraisal can be found in *Technical Document 4 Appendix 21*.

**Policy CS18 Improving Access to Local Services and Facilities**

14.30 Although it was considered unlikely to significantly change the outcome of the policy directions, there was a significant amount of additional detail added to the final Pre-Submission Policy CS18. A full appraisal was therefore undertaken. The summary conclusion is set out below:

14.31 The policy would have many benefits in sustainability terms based primarily on the benefits of shared journeys, the efficiency of co-locating facilities and protecting existing facilities and services. This will protect existing centres. The policy promotes an efficiency of land and materials through the co-location of facilities and the re-use of existing facilities.

14.32 The full appraisal is shown in *Technical Document 4 Appendix 21*.

**10.3 Task D2 (ii) Appraising significant changes resulting from representations**

14.33 If as a result of the examination, significant changes to the Strategy are proposed, the Inspector’s recommendations will need to be incorporated into the SA Report. Once this is done the Core Strategy can be adopted.
15 Task D3 Making decisions and providing information

Task D3- Making Decisions and Providing Information

15.1 The Council must produce an adoption statement to accompany the adopted DPD to show how the findings of the SA Report and general sustainability considerations have been integrated into the Core Strategy. This should make clear any changes made as a result of the SA process. The statement should also finalise monitoring information, be published on the Council’s website and be made available to public and statutory bodies.