

REVISION SCHEDULE					
Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	March 2019	SA Statement published alongside the adopted version of Plan:MK	Mark Fessey Associate Director	Steve Smith Technical Director	Steve Smith Technical Director

**Limitations**

AECOM Infrastructure & Environment UK Limited (AECOM) has prepared this Report for the use of Milton Keynes Borough Council (“Client”) in accordance with the terms and conditions of appointment. No other warranty, expressed or implied, is made as to the professional advice included in this Report or any other services provided by AECOM. This Report may not be relied upon by any other party without the prior and express written agreement of AECOM.

Where any conclusions and recommendations contained in this Report are based upon information provided by others, it has been assumed that all relevant information has been provided by those parties and that such information is accurate. Any such information obtained by AECOM has not been independently verified by AECOM, unless otherwise stated in the Report.

AECOM Infrastructure & Environment UK Limited  
2 Leman Street, London E1 8FA

**TABLE OF CONTENTS**

<b>1</b>	<b>INTRODUCTION .....</b>	<b>1</b>
<b>2</b>	<b>THE PLAN-MAKING / SEA ‘STORY’ .....</b>	<b>1</b>
	<b>2.1 Introduction .....</b>	<b>1</b>
	<b>2.2 Interim SA Report (2017) .....</b>	<b>2</b>
	<b>2.3 SA Report (2017) .....</b>	<b>2</b>
	<b>2.4 SA Report Addendum (2018) .....</b>	<b>5</b>
	<b>2.5 Plan finalisation.....</b>	<b>9</b>
<b>3</b>	<b>MEASURES DECIDED CONCERNING MONITORING.....</b>	<b>10</b>
<b>4</b>	<b>CONCLUSIONS ON THE SA PROCESS.....</b>	<b>11</b>

## 1 INTRODUCTION

### Background

- 1.1.1 Plan:MK was submitted to Government, for examination by an appointed Planning Inspector, in March 2018. The aim of Plan:MK is to allocate land for development, present policies (borough-wide and site-specific) to guide future planning applications and ultimately provide a planning framework for the Borough up to 2031.
- 1.1.2 Following an examination process, the Inspector published a report into the Plan's legal compliance and soundness in February 2019. The Inspector concluded that the plan is legally compliant and sound, subject to a series of modifications being made. The Local Plan, incorporating modifications, is recommended for adoption at a Full Council meeting on 20<sup>th</sup> March 2019.
- 1.1.3 A parallel process of Sustainability Appraisal (SA) was undertaken alongside plan-making. SA is a mechanism for considering and communicating the likely effects of an emerging plan, and reasonable alternatives, with a view to sustainable development.

### SA explained

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

### This SA Statement

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

## 2 THE PLAN-MAKING / SEA 'STORY'

### 2.1 Introduction

- 2.1.1 Key steps in the SA process were as follows -
- 1) An Interim SA Report was published alongside Draft Plan:MK in early 2017
  - 2) The SA Report was published alongside the Proposed Submission Plan:MK in late 2017
  - 3) An SA Report Addendum was published alongside proposed modifications in late 2018
  - 4) The SA Report, SA Report Addendum and consultation responses received were taken into account by the Inspector, as part of the process of modifying / finalising the plan.
- 2.1.2 Each step is discussed, in turn, below, with greater attention given to latter steps.

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

## 2.2 Interim SA Report (2017)

2.2.1 The Interim SA Report published alongside the Draft Plan MK presented an appraisal of:

- A) Housing quantum alternatives
- B) High-level housing distribution alternatives (urban vs. rural focus)
- C) Broad housing distribution options –
  - Intensification in the urban area
  - Sustainable urban extensions
  - One or more satellite settlements
  - Small scale growth at rural settlements
  - Non-strategic sites
- D) Strategic housing allocation options –
  - Northern growth area
  - Land east of the M1 motorway
  - Land to the south east of MK
  - Gayhurst new settlement
  - Haversham expansion
  - WEA expansion
  - Wavendon and Woburn Sands
- E) Non-strategic site options in isolation (x17)
- F) Broad employment land strategy options
- G) Employment land allocation options (x3)
- H) Affordable housing and housing density policy alternatives
- I) The emerging preferred approach to retail / town centre policy.

2.2.2 Consultation responses received at the Regulation 18 stage are summarised within the 'Consultation Statement' submitted alongside Plan:MK, which is available at: [www.milton-keynes.gov.uk/planning-and-building/planning-policy/plan-mk-evidence-base](http://www.milton-keynes.gov.uk/planning-and-building/planning-policy/plan-mk-evidence-base).

2.2.3 Appraisal findings, and consultation responses received, were taken into account when establishing reasonable alternatives in mid / late 2017, as discussed within Part 1 of the SA Report subsequently published alongside the Proposed Submission Plan:MK in late 2017.

## 2.3 SA Report (2017)

2.3.1 The SA Report presented key information within two 'parts', each of which is discussed in turn below.

### Part 1: Plan-making / SA up to this stage

2.3.2 There were three main sections within Part 1 of the report:

- Chapter 6 explained the process completed in order to arrive at a series of reasonable spatial strategy alternatives, i.e. alternative packages of site allocations. In summary, the process involved: A) giving consideration to strategic considerations (e.g. Objectively Assessed Housing Need, OAHN); and B) examining the individual site options available and reasonably in contention for allocation; before then C) drawing understanding together to arrive at reasonable alternatives. This process generated a considerable amount of interest, and stimulated lengthy debate during the subsequent examination hearings. A number of stakeholders suggested that the focus of the reasonable alternatives was unduly narrow, with the decision made regarding sites that should feature lacking justification.
- Chapter 7 presented an appraisal of the reasonable alternatives, discussing the merits of the alternatives in respect of a range of key issues including: housing and the economy (all options would lead to significant positive effects, but higher growth options perform best); soils (all options would lead to significant negative effects on account of the amount of 'best and most versatile' agricultural land lost); access to community facilities (higher growth options perform best, given support for strategic scale schemes capable of delivering new education facilities and other strategic community infrastructure); and traffic, air quality and noise (higher growth options give rise to concerns, with both of the strategic site options in question associated with specific locational issues/challenges).
- Chapter 8 presented the Council's response to the alternatives appraisal, i.e. the Council's reasons for supporting the preferred option (Option 4). The Council's response/reasons were as follows:

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

*Whilst options involving growth to the east of the M1 have considerable social and economic benefits, uncertainty still exists over the deliverability of growth in this location linked to the availability of necessary infrastructure funding. Funding to enable growth in this area is being pursued by the Council, and therefore Plan:MK supports growth east of the M1, with its delivery within the plan period conditional on infrastructure funding being secured. In effect, therefore, the Council's preferred option is a modified Option 4, or an option that lies somewhere in between Option 4 and Option 8 (or an Option 8+ recognising that the Council would not want to restrain the quantum of homes East of the M1 to 1,500, should the necessary infrastructure be in place).”*

#### Part 2: Appraisal findings at this stage

##### 2.3.3

An appraisal of the Proposed Submission Plan:MK was presented under a series of thematic headings (i.e. the SA framework established through scoping) before a final section presented the following overall conclusion:

*“The appraisal finds the Proposed Submission Plan to perform notably well in respect of ‘Housing’ and ‘Businesses / economy / employment’ objectives, with the conclusion reached that there is the likelihood of ‘significant positive effects’ on the baseline. The appraisal also finds the plan to perform well in terms of several other objectives – notably ‘Transport’ – without going as far as to predict significant positive effects.*

*Significant negative effects are predicted only in respect of 'Natural resources' objectives, for the simple reason that the proposed South East MK urban extension would result in significant loss of 'best and most versatile' agricultural land. A range of other specific drawbacks, issues and uncertainties are highlighted, including relating to South East MK (uncertainty regarding strategic community infrastructure, and a concern regarding cumulative impacts of growth here alongside completion of the Eastern Expansion Area and Strategic Land Allocation); and East of the M1 (distance and separation from Central Milton Keynes, CMK).*

*A number of specific recommendations are made within the appraisal text, which might be actioned in order to improve the performance of the plan in respect of specific objectives (albeit there could be a need to weigh adverse consequences for other objectives). These recommendations can be given consideration by the Council and Inspector during the Local Plan examination."*

2.3.4 There was also a concluding statement on cumulative effects, as follows:

*"The SA process has included a focus on effects not just at the Milton Keynes scale, but at appropriate larger-than-local functional scales, taking account of other Local Plans. Such effects might be described as 'cumulative effects'.*

*In particular, there is a need to consider the effects of Plan:MK not just on the MK administrative area but on: the MK urban area, which extends into neighbouring Aylesbury Vale District, and might potentially extend into neighbouring Central Bedfordshire District; and the Oxford – MK – Cambridge corridor, which intersects numerous local authority areas.*

*Economic growth matters have emerged as perhaps the key 'larger than local' consideration, with the conclusion reached that the plan performs very well. The proposal is to provide for a quantum of employment growth over-and-above that identified as strictly necessary through modelling work, thereby building-in flexibility to ensure that economic growth opportunities within the corridor can be fully realised. Flexibility is important, recognising that uncertainty exists regarding what other Local Plans in the corridor will deliver.*

*Secondary school provision is potentially another 'larger than local' issue, recognising that school catchments can stretch across local authority administrative boundaries. Delivery of a secondary school at East of the M1 and/or SE MK could potentially help to 'unlock' growth within Central Bedfordshire District. At the current time, there is an expectation that any scheme to the East of M1 would deliver a secondary school; however, there is currently less certainty in respect of SE MK."*

2.3.5 Consultation responses received at the Regulation 19 stage are summarised within the 'Regulation 22 Statement' submitted alongside Plan:MK, which is available at: [www.milton-keynes.gov.uk/planning-and-building/planning-policy/plan-mk-evidence-base](http://www.milton-keynes.gov.uk/planning-and-building/planning-policy/plan-mk-evidence-base). The statement presents the following summary of consultation responses received in respect of the development strategy:

*"No fundamental objections on the soundness of the Proposed Submission Plan:MK were received from Highways England, Environment Agency, Natural England, Historic England, Anglian Water, Bucks Natural Environment Partnership (NEP) and neighbouring LPAs. However, Historic England, Natural England, Environment Agency, Anglian Water and the Bucks NEP did object to the wording of various policies (principally development management policies). The objections relate to specific policy wording and terminology.*

*A number of omission site promoters have objected with the assertion that there is no robust site assessment and selection process or how the assessment of reasonable alternatives has been done, in particular with regard to the choice of the South Caldecotte Strategic Employment Site and the East of M1 Strategic Urban Extension.*

*A number of site promoters suggested that the Objectively Assessed Housing Need methodology is flawed, particularly in how we account for past under-delivery, job forecasts, the recommendations made by the National Infrastructure Commissions on growth within the Oxford-Milton Keynes Cambridge arc or corridor.*

*A range of alternative housing targets were suggested ranging up to around 37,000 homes over the plan period. Higher housing targets have been argued on the grounds of the Council using a flawed methodology for calculating the Objectively Assessed Housing Need, and because the Council should be seeking to deliver a higher amount of growth to maximise the opportunities provided by significant infrastructure investment in and around Milton Keynes, principally East West Rail and the Oxford to Cambridge Expressway.*

*A number of omission site promoters' object to the strategy for meeting the housing target. Whilst the buffer is welcomed, it is argued that the allocations are reliant on large sites which take time/are subject to delays, which will result in a failure to provide a five-year housing land supply upon adoption and throughout the plan period.*

*Rural omission site promoters object that the plan does not positively seek to meet the needs of rural communities by planning for development in the rural area.*

*A number of omission site promoters' object to the plan period being too short. Suggestions range from at least 2033 (15 years from the point of expected adoption in 2018) to 2036.*

*CMK Town Council and some omission site promoters object on the grounds that the expected number of dwellings from the SHLAA is an over-estimate as it does not account for lapsed permissions and uses higher densities than in neighbourhood plans."*

## **2.4 SA Report Addendum (2018)**

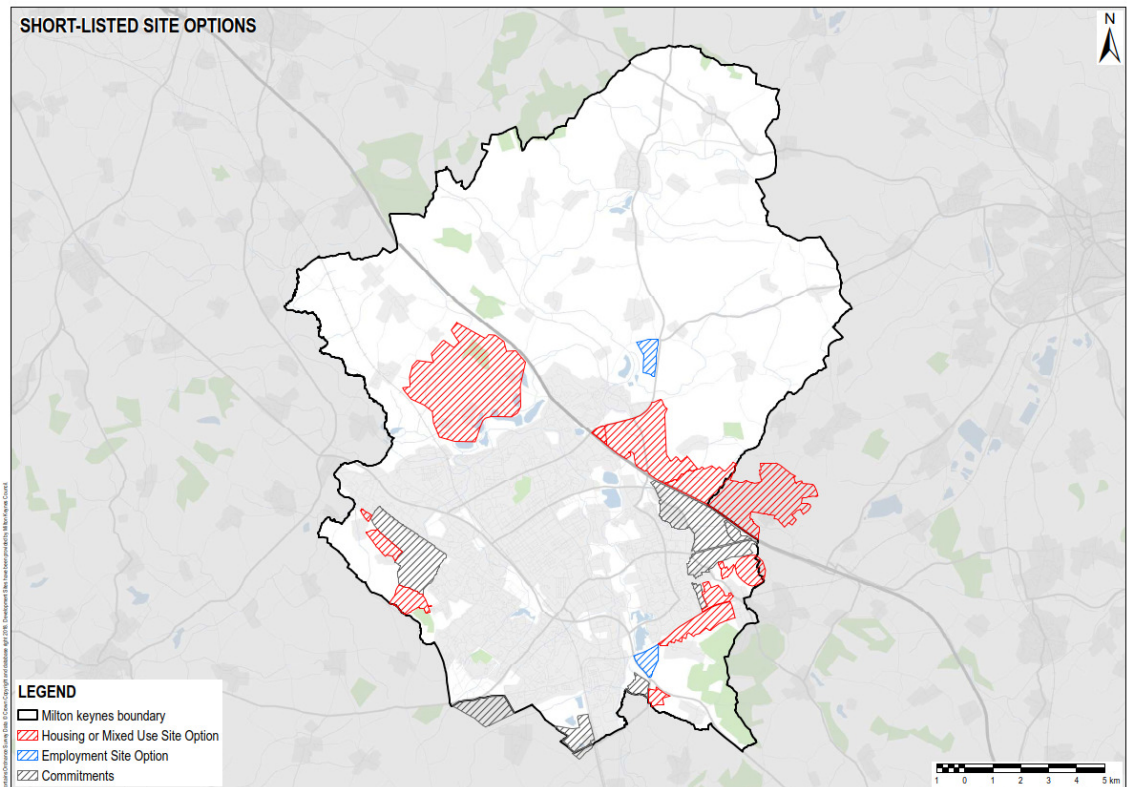
2.4.1 The SA Report Addendum published for consultation alongside proposed modifications (to Plan:MK as submitted) was structured in two primary 'parts', each of which is discussed in turn below.

### **Part 1: Plan-making / SA up to this stage**

2.4.2 There were three main sections within Part 1 of the report:

- Chapter 3 explained the process completed in order to arrive at a series of revised reasonable spatial strategy alternatives, i.e. alternative packages of site allocations. In summary, the process involved: A) giving consideration to strategic considerations (including guidance provided by the Inspector in his two written notes that followed completion of the hearing sessions); and B) examining the individual site options available and reasonably in contention for allocation (see Figure 2.1), with the analysis more in-depth than that completed ahead of publication/submission, to respond to concerns raised; before then C) drawing understanding together to arrive at the following five reasonable alternatives:
  - 1) Submission allocations
  - 2) Submission allocations plus 500 homes at Levante Gate
  - 3) Submission allocations plus 700 homes at Wavendon Golf Club
  - 4) Submission allocations plus 1,200 homes at Levante Gate and Wavendon Golf Club
  - 5) Submission allocations plus 1,500 homes at Shenley Dens

Figure 2.1: Site options examined within Chapter 3 of the SA Report Addendum (2018)



- Chapter 4 presented an appraisal of the reasonable alternatives, reaching the following overall conclusion:

*“A headline conclusion is that Option 1 (submission allocations) performs best, or equal best, in terms of all objectives other than ‘Housing’. The housing land supply under Option 1 (the lowest growth option) has been determined to be suitably robust by the Plan:MK Planning Inspector (see paras. 3.2.10 and 3.2.11, above) in that it will deliver the established OAHN / housing target (26,500 homes) over the course of the plan period, and on a suitably smooth trajectory (i.e. in the region of 1,766 dpa). However, additional supply (i.e. Options 2 to 5) would further reduce the risk of falling below the committed/required housing trajectory due to unforeseen delays to delivery at one or more sites (and thereby further increase confidence in respect of the Council’s ability to demonstrate a rolling five year housing land supply, and meet the Housing Delivery Test, across the plan period).*

*The second point to note is that Option 5 performs relatively well in relation to a number of objectives, but notably poorly in terms of ‘Landscape’, as the additional allocation in question - Shenley Dens - is constrained by its location on the Shenley Ridge. An alternative Shenley Dens scheme, using only the eastern-most c.1/3 of the site (namely that which relates best to the existing urban edge) has recently been promoted to the Council; however, landscape concerns would remain. The northern edge would abut the open space planned as the southwestern buffer of the WEA, responding to the Shenley Ridge.*

*A third point to note is the identical conclusion reached within the ‘Communities’, ‘Education’, ‘Health’ and ‘Services’ rows of the appraisal table. Option 4 performs poorly as it runs contrary to the broad policy of supporting housing delivery at strategic scale sites that are well suited to delivering significant new and upgraded infrastructure.*

*Focusing on the question of Option 2 versus Option 3, the appraisal finds Option 3 to perform better in landscape, noise and transport terms; however, these conclusions are all somewhat marginal, and it does not automatically follow that Option 3 is the better option overall (e.g. noting that Option 2 performs better in ‘Heritage’ terms).”*



- Chapter 5 presented the Council's response to the alternatives appraisal, i.e. the Council's reasons for supporting the preferred option (Option 1). The Council's response/reasons were as follows:

*"The alternatives appraisal lends clear justification for Option 1. The housing supply trajectory, under Option 1, is considered suitably robust, and whilst arguments for providing for an increased rate of housing delivery are emerging - given Government's commitment to delivering 1 million new homes in the Oxford to Cambridge Arc by 2050 - it will be for the review of Plan:MK to respond."*

#### Part 2: Appraisal findings at this stage

2.4.3 There were three elements to the appraisal findings presented within Part 2 of the SA Report Addendum.

2.4.4 Firstly, the report presented an appraisal of proposed modifications, reaching the following conclusion:

*"The appraisal finds proposed modifications to have wide-ranging positive implications, notably in respect of-*

- *Communities - the effect of proposed modifications is strongly positive, and in particular the proposal to deliver a new seven form entry secondary school.*
- *Homes - the effect of the new commitment to an early review, in particular, is strongly positive. Adjustments to policies HN2 (Affordable Housing) and Policy HN11 (Gypsies and Travellers) are also strongly supported.*
- *Biodiversity - the effect of proposed modifications is mostly positive, in particular the new requirements in respect of 'net gain'.*
- *Landscape - the requirement to "mitigate any harm caused to the Brickhills area" is strongly positive.*
- *Climate change mitigations - there is increased certainty regarding delivery of East of M1- a strategic site with clear potential to deliver ambitious low carbon infrastructure - but still no firm commitments regarding opportunities for the scheme to minimise per capita CO<sub>2</sub> emissions.*
- *Natural resources - a new policy is proposed relating to protection of best and most versatile agricultural land; however, it is judged likely to lead to only minor benefits. There is, first and foremost, a need to take account of agricultural land quality as part of site selection.*
- *Transport - the effect of proposed modifications is strongly positive, e.g. the new requirement for walking and cycling routes within Milton Keynes East that are "segregated, and where appropriate grade-separated".*
- *Economy - a highly ambitious approach to employment land delivery is proposed, which is strongly supportive of ambitions for the Oxford to Cambridge Arc.*

*No major tensions (between proposed modifications and sustainability objectives) are highlighted, although there a number of ways in which modifications could feasibly 'go further'."*

2.4.5 Secondly, the report presented an appraisal of the "Submission Plan:MK plus proposed modifications", reaching the following conclusion:

*"[The SA Report conclusion; see para 2.3.3 above] broadly holds true for "the submission plan plus proposed modifications". East of MK is now a firm allocation, but site specific policy has been considerably supplemented. Site specific policy for South East MK has also been supplemented, e.g. with a firm requirement to deliver a new secondary school."*

2.4.6 Finally, the report presented the following supplementary information on 'characteristics' of effects associated with Plan:MK, in response to concerns raised during the examination:

*"Probability of effects - the appraisal focuses on effects that are probable, although consideration is also given to 'unlikely' effects (e.g. it is 'unlikely' that the proposed agricultural land policy will lead to best and most versatile agricultural land being retained).*

*Duration of effects - the proposed allocations will build-out over an extended period of time, and indeed East of MK will deliver partly beyond the plan period. This gives rise to wide-ranging considerations, e.g. the need to avoid subjecting communities to the negative effects of building works over a long period of time, and also the need for development to be in-line with unknown future issues/priorities, e.g. in relation to the Oxford to Cambridge Arc.*

*Frequency of effects - many of the effects discussed will be broadly continuous, whilst others will be infrequent, in that they will occur when specific developments come forward.*

*Reversibility of effects - most of the effects discussed will be irreversible, or at least will not be reversible in the foreseeable future.*

*Cumulative nature of the effects - there is a stand-alone discussion of cumulative effects above, specifically a discussion of the proposed modifications impacting in combination with the rest of Plan:MK, namely that part which is not the focus of proposed modifications. There is also a stand-alone discussion of cumulative effects in the submission SA Report - see Section 10.19 - where the focus is on the effects of Plan:MK in combination with other adopted and emerging plans, including plans for the Oxford to Cambridge Arc.*

*Transboundary nature of the effects - the aim of the Regulations is to ensure that explicit consideration is given to international effects. Plan:MK is not likely to result in significant effects internationally; however, plans for the Oxford to Cambridge Arc are potentially of international significance, and it is clear that Milton Keynes is central to emerging plans.*

*Risks to human health or the environment (for example, due to accidents) - impacts to human health have been a focus of appraisal, as have environmental health considerations, including in relation to noise and air quality. Detailed issues will be considered further at the development management stage.*

*The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected) - the appraisal has involved discussion of wide-ranging impact receptors, and there has also been a focus on 'larger than local' impacts, e.g. the potential for growth of MK to have implications for the achievement of planning / sustainable development objectives across Central Bedfordshire, and across the Oxford to Cambridge Arc.*

*The value and vulnerability of the area likely to be affected due to special natural characteristics or cultural heritage - the appraisal has included a focus on valued aspects of the baseline, including areas with special natural characteristics or cultural heritage, for example the Greensand Ridge and associated villages, notably the Brickhills.*

*The value and vulnerability of the area likely to be affected due to exceeded environmental quality standards or limit values - no aspect of the baseline has been identified whereby there is both A) a breach of environmental quality standards or limit values; and B) the potential for a cause-effect relationship with Plan:MK.*

*The value and vulnerability of the area likely to be affected due to intensive land-use - as above.*

*The value and vulnerability of the area likely to be affected due to the effects on areas or landscapes which have a recognised national, Community or international protection status - there are no designated landscapes in the vicinity of MK; however, there are a range of areas and assets protected for other reasons. The appraisal has included a focus on the effects of Plan:MK on such areas and assets, e.g. conservation areas."*

## 2.5 Plan finalisation

2.5.1 The Inspector published his report on Plan:MK in February 2019, concluding on the modifications necessary in order to achieve soundness, and commenting on the merits of the plan in respect of a number of the issues that had been a focus of preceding SA, notably:

- In respect of seeking to maximise the long term growth opportunity, the Inspector concluded (para 20) that, overall, the submitted Plan:MK to 2031 proposes levels and strategic locations of growth that *“would not diminish the City’s role as part of the wider caMKox growth ambitions and appropriately acknowledges the ambitions of the MKFutures 2050 and [National Infrastructure Commission] reports.”*
- In respect of the housing requirement (growth quantum), the Inspector concluded (paras 66 and 68) that: *“The housing requirement of at least 2,500 dwellings is the same as the full OAN... [this] is soundly based in that it is positively prepared and would be effective in addressing the need for a variety of housing, including affordable provision.”*
- In respect of employment land strategy, the Inspector concluded (paras 81 and 82) that: *“The Plan seeks to accommodate the provision for employment land on larger strategic sites rather than disaggregating provision over a number of sites. This is a sound approach given the need for larger land areas for storage and distribution and the infrastructure required to service these sites... The SA has considered an alternative option of land north east of Newport Pagnell. There would be distinct disadvantages of splitting the need for additional employment land on to sites which in themselves cannot meet the totality of supply (47.5 hectares) for the larger warehouse and distribution uses. It is also a fair conclusion in the SA that land north east of Newport Pagnell is sequentially less preferable than the other two options at South Caldecotte and MKE. Plan:MK would appropriately provide for employment land well related to the strategic road network (M1 and A5) in locations accessible for employees. This is a justified and effective approach and the most appropriate when considered against the alternatives.”*
- In respect of the South East MK strategic allocation (3,000 homes) the Inspector concluded (para 100) that: *“Notwithstanding the sequencing around any final route alignment for the Expressway, SEMK presents a highly sustainable and logical extension to Milton Keynes that presents one of the best options to align growth in the Plan period to the future emphasis on east-west connections with Cambridge and Oxford whilst being sustainably connected to jobs, services and facilities in Milton Keynes. There will be a lead-in time to delivery but given the site is relatively free from constraint there is no reason why it should not make a substantial contribution to development during the mid and latter... Plan period.”*
- In respect of the other housing-led strategic allocation, namely MK East, the Inspector concluded (para 119) that: *“it would represent a sizeable addition to the land supply in a sustainable location. It would also not be prejudicial to future growth options.”*

2.5.2 The Inspector also made the following comments on the Plan:MK SA process more generally:

- Para 85 - *“Drawing on sources such as the SHLAA and ELS evidence, I am satisfied that the SA presents an appropriate rationale as to why only a focused pool of sites progressed to detailed assessment. Overall, I find the judgements in the SA to be reasonable and the strategic site selection process to be soundly based.”*
- Para 227 - *“The approach taken in Milton Keynes is a particularly focused and narrative-based approach which has appropriately concentrated on those areas where there are genuine significant effects and reasonable alternatives. The outcome is a more transparent report that avoids the issue of sustainability appraisal becoming an unmanageable audit trail of options that are either not sufficiently distinct alternatives and/or options that have no significant effect in terms of the SA (including environmental) objectives. Following the examination hearings some additional work was undertaken in the SA addendum to reflect the proposed main modifications but also present the key sustainability appraisal findings in a more systematic (tabular) format and to expand the discussion on some aspects of the environmental reporting to align with the requirements of Strategic Environmental Assessment. With these amendments the SA is adequate.”*

### 3 MEASURES DECIDED CONCERNING MONITORING

3.1.1 The SA Report stated the following measures envisaged concerning monitoring:

*“The Proposed Submission Plan includes a proposed monitoring framework, which lists indicators covering the majority of issues that are a focus of the appraisal presented above (Chapter 10). In relation to the achievement of ‘Housing’ objectives, the proposal is to monitoring [sic] five year housing land supply and affordable housing deliver, amongst other things. There may be the potential to apply more innovative monitoring indicators, in order to more fully understand the reasons for any delivery problems that might arise.”*

3.1.2 The Inspector’s Report does not identify a need for any modifications to the monitoring framework and concluded the following at paras 221 and 222:

*“The submitted Plan contains a Monitoring Framework which indicates how the implementation of policies will be measured and when intervention would be necessary and what it would entail. The annual monitoring report, five year housing land statements and LIP processes will provide an appropriate basis to inform the monitoring and establish plan performance. Additionally, the monitoring framework refers to partnership arrangements including with adjoining authorities and more widely through SEMLEP and other activities. These wider arrangements will also provide signals for future plan review work... Overall, the Plan would effectively ensure development progress, including infrastructure, is monitored so that timely interventions can be made where necessary.”*

3.1.3 From an SA perspective - i.e. a perspective of wishing to monitor steps taken to address the issues/impacts highlighted through the appraisal of Plan:MK - key monitoring indicators include:

- Net additional dwellings split by area
- Regeneration of Wolverton and Bletchley.
- Affordable housing split by tenure
- Air quality
- Cycle journeys to CMK
- New dwellings within walking distance of key services, facilities and public transport
- Per capita reduction in CO<sub>2</sub> emissions
- New developments with a community energy network

**4 CONCLUSIONS ON THE SA PROCESS**

- 4.1.1 This SA Statement demonstrates that a robust SA process has been progressed alongside plan-making, with appraisal findings feeding in to decision-making at key junctures. Most importantly, in terms of compliance with both the SEA and Local Planning Regulations, the SA Report was published alongside the proposed submission version of the plan in 2017, presenting the required information. The report served to inform representations on the plan, and then served to inform plan finalisation.
- 4.1.2 This SA Statement is the final step in the SA process. Its aim is to explain the ‘story’ of the plan-making / SA process, and also present measures decided concerning monitoring. **Table 4.1** serves to demonstrate that this report presents the required information.

*Table 4.1: Regulatory checklist*

<i>The SA Statement must...</i>	<b>How has this report presented the required information?</b>
Summarise how environmental (and wider sustainability) considerations have been integrated into the plan	This report has sought to provide examples of key sustainability considerations that have been highlighted through appraisal and consultation, which in turn were taken into account. First and foremost, the relative merits of competing site options and spatial strategy alternatives were appraised in terms of a range of sustainability issues/objectives, with a view to informing selection of the best performing sites / spatial strategy.
Summarise how the SA Report and consultation responses received, as part of the Draft Plan / SA Report consultation, have been taken into account when finalising the plan.	This statement seeks to explain an iterative process, particularly in respect of exploring reasonable alternatives. Reference is made to consultation responses received in Sections 2.2 and 2.3. Also, Section 2.5 seeks to demonstrate that the SA Report and consultation responses received were taken into account by the Inspector when deciding on modifications / finalising the plan.
Summarise the reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with.”	The SA Report (2017) presented a discussion of the justification for the preferred spatial strategy, as did the SA Report Addendum (2018). The Inspector’s report equally sets out detailed reasons in support of his conclusion on plan soundness, with reference to reasonable alternatives.