

Sustainability Appraisal (SA) of Plan:MK

SA Report Addendum
Non-technical Summary

October 2018

DOCUMENT DETAILS

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1	Oct 2018	Non-technical Summary (NTS) of the SA Report Addendum published alongside proposed modifications to Plan:MK as previously submitted	Mark Fessey Associate	Steven Smith Technical Director	Steven Smith Technical Director

Limitations

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AECOM Infrastructure & Environment UK Limited
 2 Leman Street, London E1 8FA
 Telephone: 020 7061 7000

Introduction

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

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

The Local Plan is at an advanced stage of preparation, with the 'proposed modifications' currently published for consultation. An SA Report Addendum is published alongside proposed modifications, with a view to informing the consultation and plan finalisation.

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

Structure of the SA Report Addendum / this NTS

SA reporting essentially involves answering the following questions in turn:

1. What has plan-making / SA involved *up to this point*?
 - i.e. preceding finalisation of proposals for consultation.
2. What are the appraisal findings *at this current stage*?
 - i.e. in relation to the proposals published for consultation.
3. What happens *next*?

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

What's the scope of the SA?

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

Sustainability issues and objectives (the SA framework)

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

PLAN-MAKING / SA UP TO THIS POINT

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

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

N.B. the alternatives at the current time are a refinement of those previously published in the SA Report.

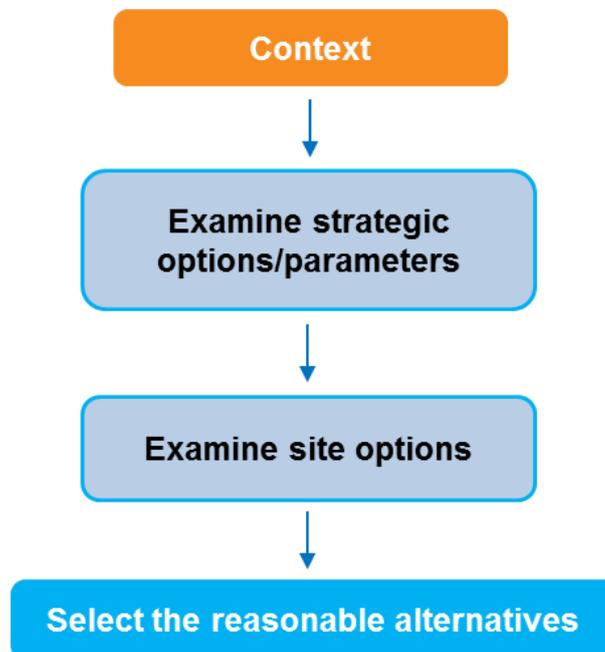
Specifically, Part 1 of the report -

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

Establishing reasonable alternatives

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

Establishing the refined reasonable spatial strategy alternatives (Oct 2018)



In light of these steps the following spatial strategy alternatives emerged -

- 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

The reasonable alternatives are shown across a series of maps, below.

Appraising reasonable alternatives

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

Summary appraisal of the refined reasonable spatial strategy alternatives (October 2018)

Topic	Rank of performance / categorisation of effects				
	Option 1 Sub'n allocations	Option 2 Sub'n allocations Levante Gate	Option 3 Sub'n allocations Wavendon GC	Option 4 Sub'n allocations Levante Gate Wavendon GC	Option5 Sub'n allocations Shenley Dens
Communities	★1	2	2	3	★1
Deprivation	=	=	=	=	=
Education	★1	2	2	3	★1
Health	★1	2	2	3	★1
Homes	5	4	3	2	★1
Services	★1	2	2	3	★1
Air quality	=	=	=	=	=
Biodiversity	★1	★1	★1	★1	2
Climate change	=	=	=	=	=

Topic	Rank of performance / categorisation of effects				
	Option 1 Sub'n allocations	Option 2 Sub'n allocations Levante Gate	Option 3 Sub'n allocations Wavendon GC	Option 4 Sub'n allocations Levante Gate Wavendon GC	Option5 Sub'n allocations Shenley Dens
Heritage	★1	★1	2	2	2
Landscapes	★1	3	2	4	5
Nat resources	★1	3	2	4	2
Noise	★1	2	★1	2	★1
Transport	★1	3	★1	2	★1
Water	=	=	=	=	=
Business/ Economy/ Employment	=	=	=	=	=

Conclusion

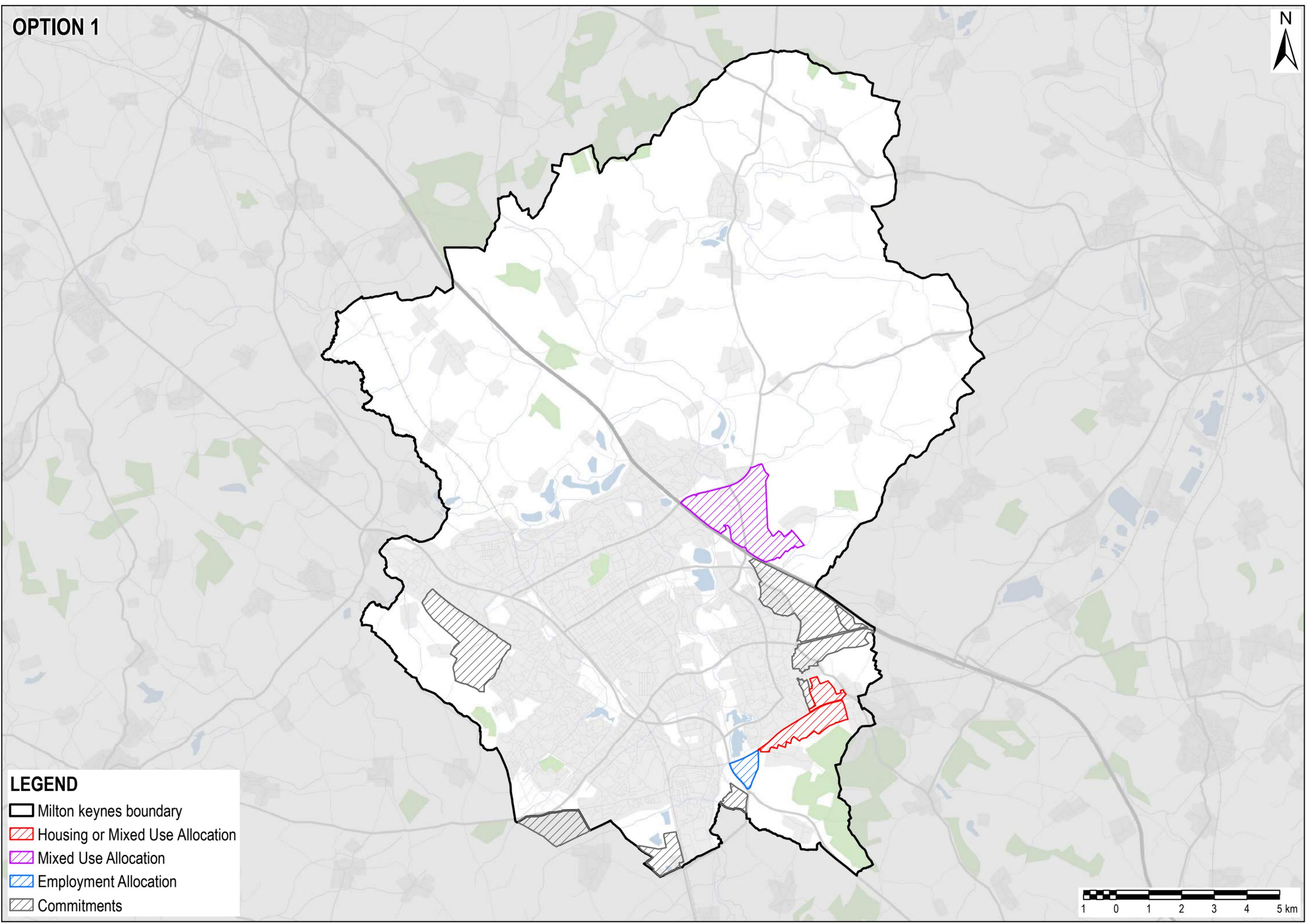
A headline conclusion is that Option 1 (submission allocations) performs best, or equal best, in terms of all objectives other than 'Housing'. The housing land supply under Option 1 (the lowest growth option) has been determined to be suitably robust by the Plan:MK Planning Inspector (see paras. 3.2.10 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.

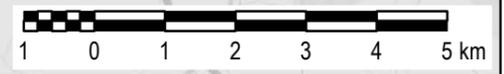
Focusing on the question of Option 2 versus Option 3, the appraisal finds Option 3 to perform better in landscape, noise and transport terms; however, these conclusions are all somewhat marginal, and it does not automatically follow that Option 3 is the better option overall (e.g. noting that Option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

OPTION 1

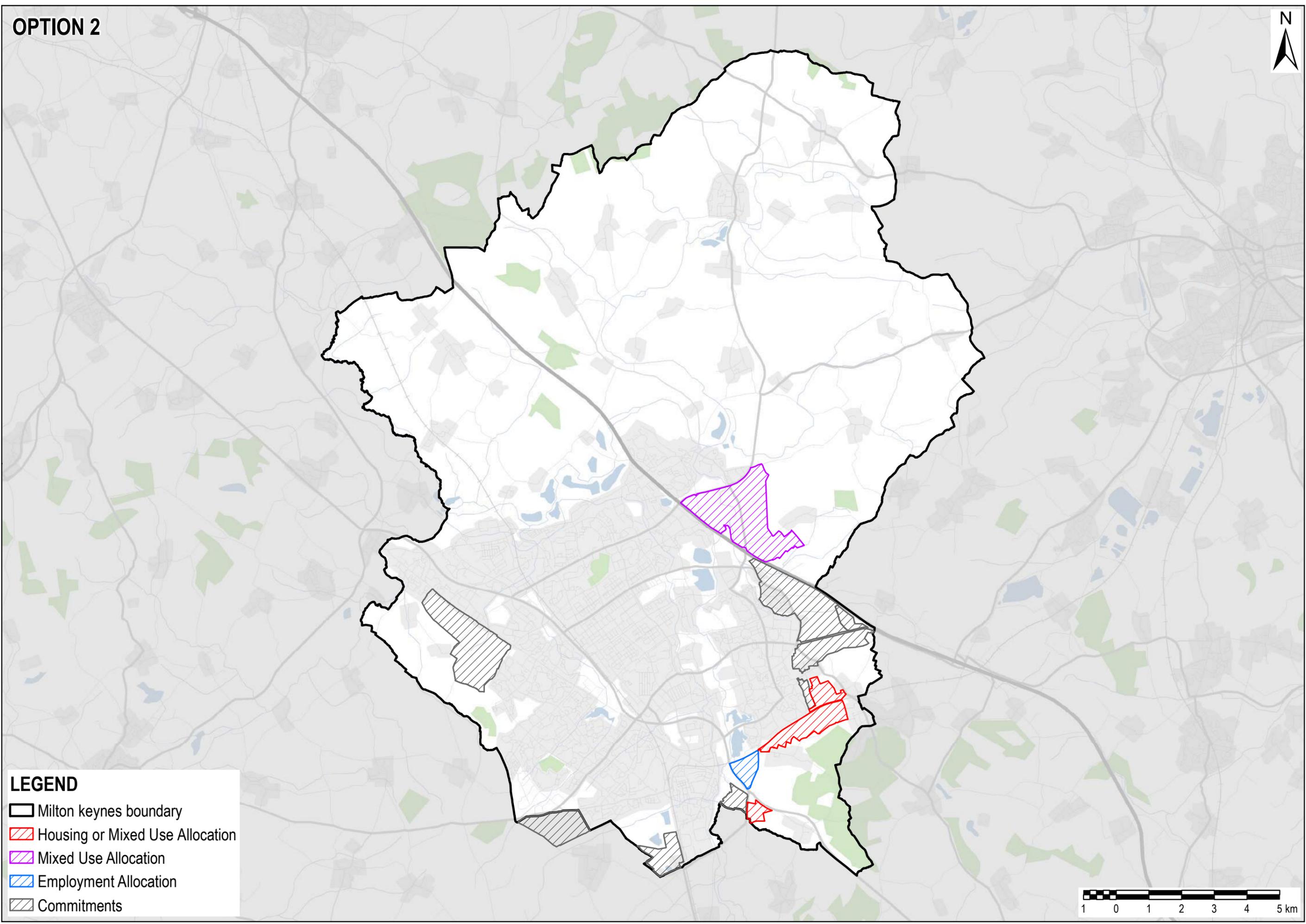


LEGEND

-  Milton Keynes boundary
-  Housing or Mixed Use Allocation
-  Mixed Use Allocation
-  Employment Allocation
-  Commitments

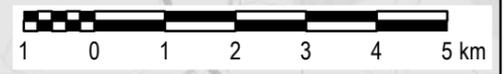


OPTION 2

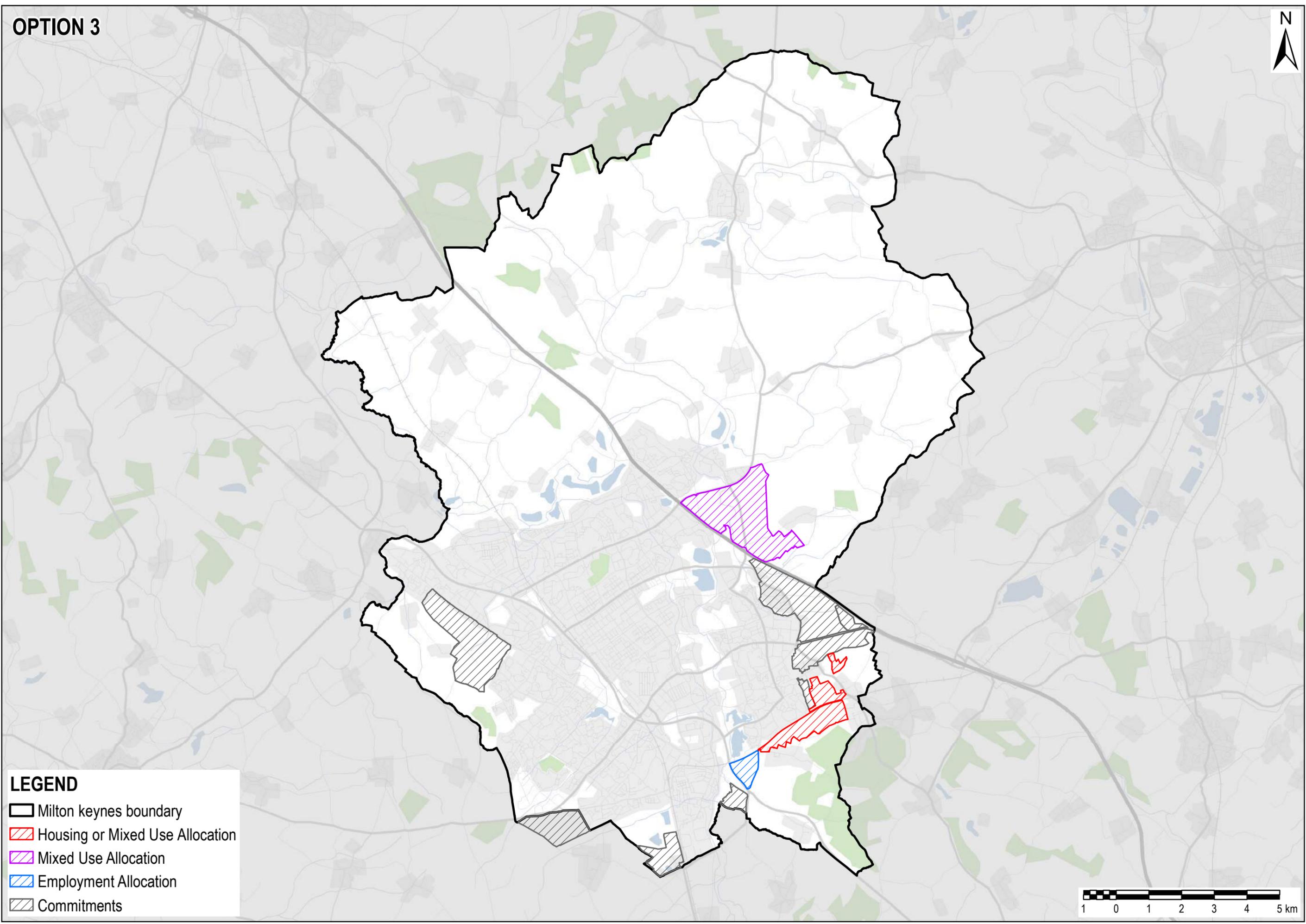


LEGEND

- Milton Keynes boundary
- Housing or Mixed Use Allocation
- Mixed Use Allocation
- Employment Allocation
- Commitments

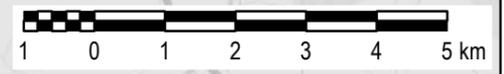


OPTION 3



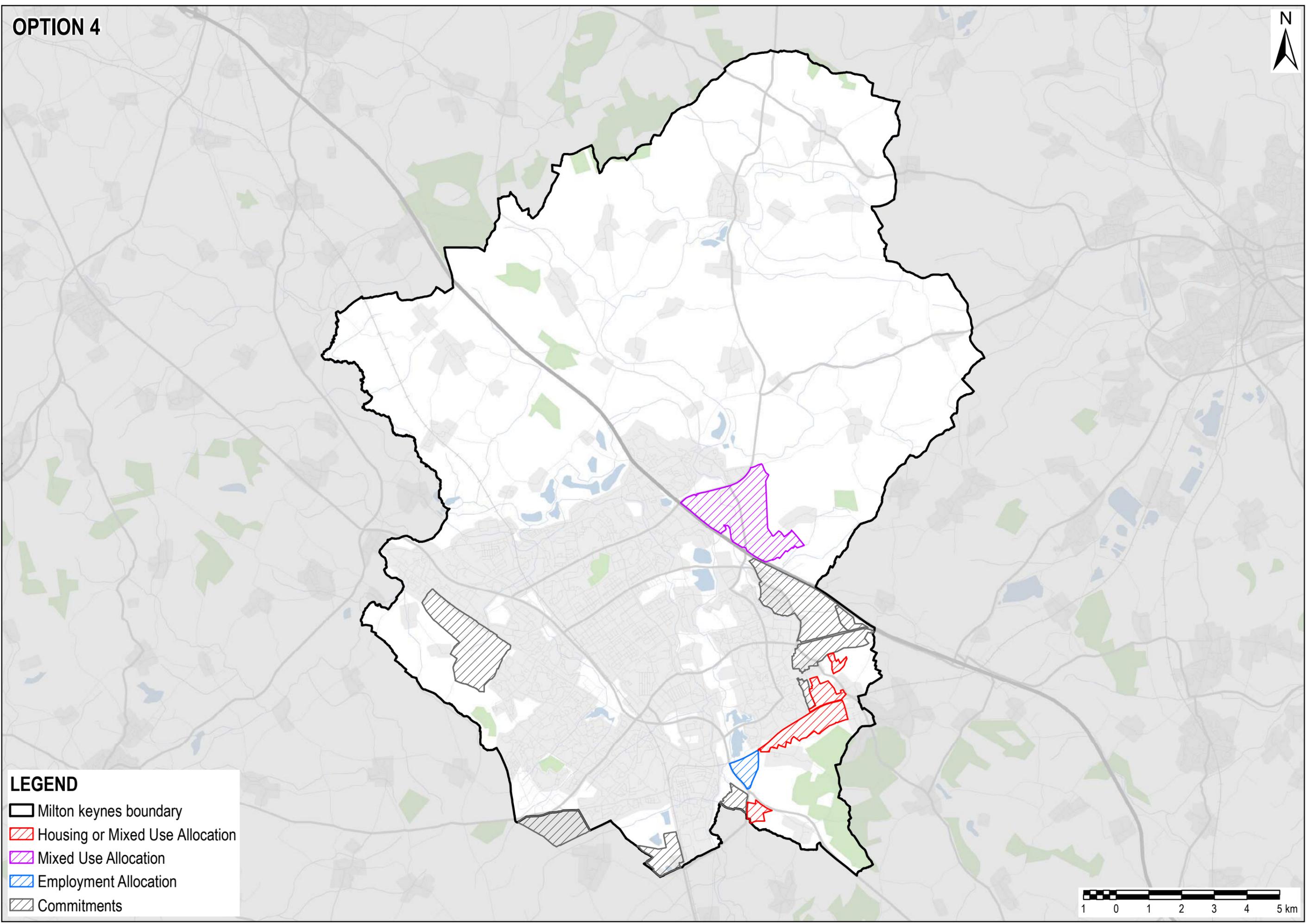
LEGEND

- Milton Keynes boundary
- Housing or Mixed Use Allocation
- Mixed Use Allocation
- Employment Allocation
- Commitments



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OPTION 4

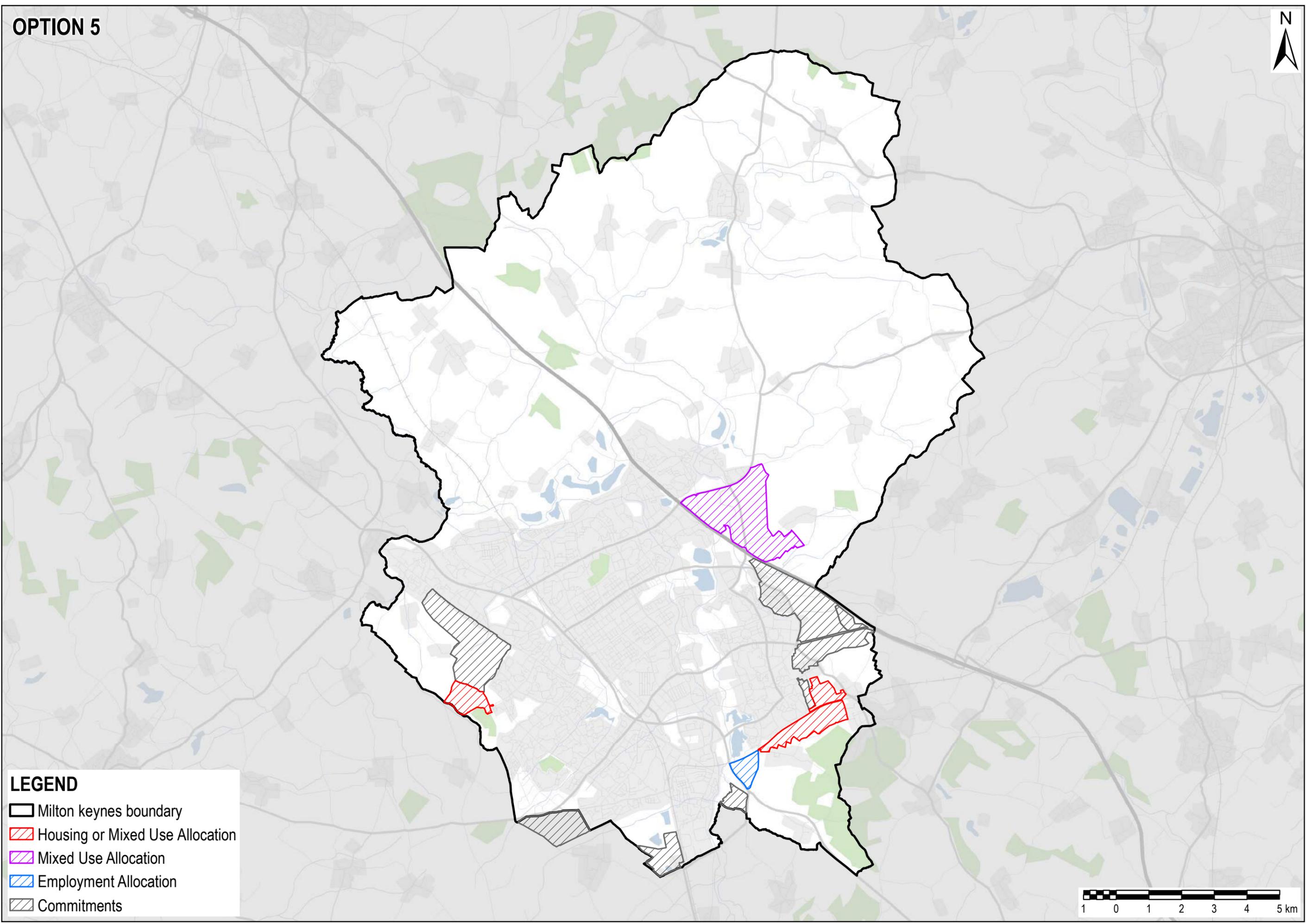


LEGEND

- Milton Keynes boundary
- Housing or Mixed Use Allocation
- Mixed Use Allocation
- Employment Allocation
- Commitments

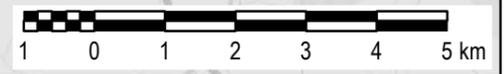


OPTION 5



LEGEND

- Milton Keynes boundary
- Housing or Mixed Use Allocation
- Mixed Use Allocation
- Employment Allocation
- Commitments



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Establishing the preferred option

The Council's preferred approach is Option 1. The following text, which is provided by the Council explains the reasons for supporting Option 1 -

"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.

APPRAISAL FINDINGS AT THIS STAGE

Part 2 of the SA Report Addendum presents an appraisal of the proposed modifications. Appraisal findings are presented as a series of narratives under the 'SA framework' headings. Conclusions are repeated here.

The appraisal finds proposed modifications to have wide-ranging positive implications, notably -

- 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 CO2 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'.

Cumulative effects

The overall conclusion of the "appraisal of the proposed submission plan" presented in Chapter 10 of the SA Report was as follows:

“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 draw-backs, 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 MK (distance and separation from CMK).

These conclusions broadly hold 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.

Next steps

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

Plan finalisation

Subsequent to the current modifications consultation the Inspector will consider all representations received, before then considering whether or not there is a need for further examination hearing sessions. In due course, the Inspectors will then prepare a report on the soundness of the Local Plan.

Assuming that the Inspector is able to find the plan ‘sound’, it will then be adopted by the Council. At the time of adoption an ‘SA Statement’ will be published that explains the process of plan-making / SA in full and presents ‘measures decided concerning monitoring’.

Monitoring

The Submission Plan includes a monitoring framework, which lists indicators covering the majority of issues that are a focus of the appraisal presented above. In relation to the achievement of ‘Housing’ objectives, the proposal is to monitoring five year housing land supply and affordable housing deliver, amongst other things.

At the current time, the most important consideration is the need to monitor implementation of the supplemented site specific policies for the South East MK and East of MK strategic allocations.