

# Sustainability Appraisal (SA) of Plan:MK

SA Report  
Non-technical Summary

November 2017

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## 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 submission' published for consultation, under Regulation 19 of the Local Planning Regulations. The SA Report is published alongside the Proposed Submission Plan, in accordance with the Regulations.

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

### Structure of the SA Report / 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.

Table 1: Sustainability issues and objectives (the SA framework)

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

## 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.

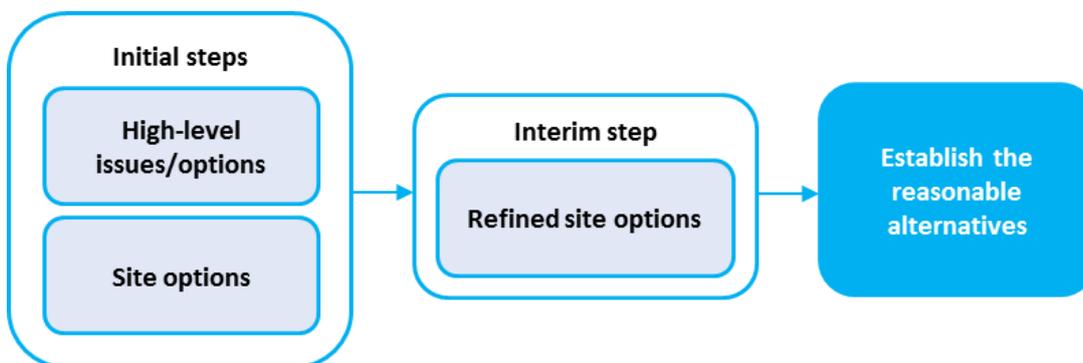
Specifically, Part 1 of the report -

- 1) explains the process of **establishing** the reasonable spatial strategy alternatives;
- 2) presents the outcomes of **appraising** the 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).

*Figure 1: The process of establishing the reasonable alternatives (summary)*



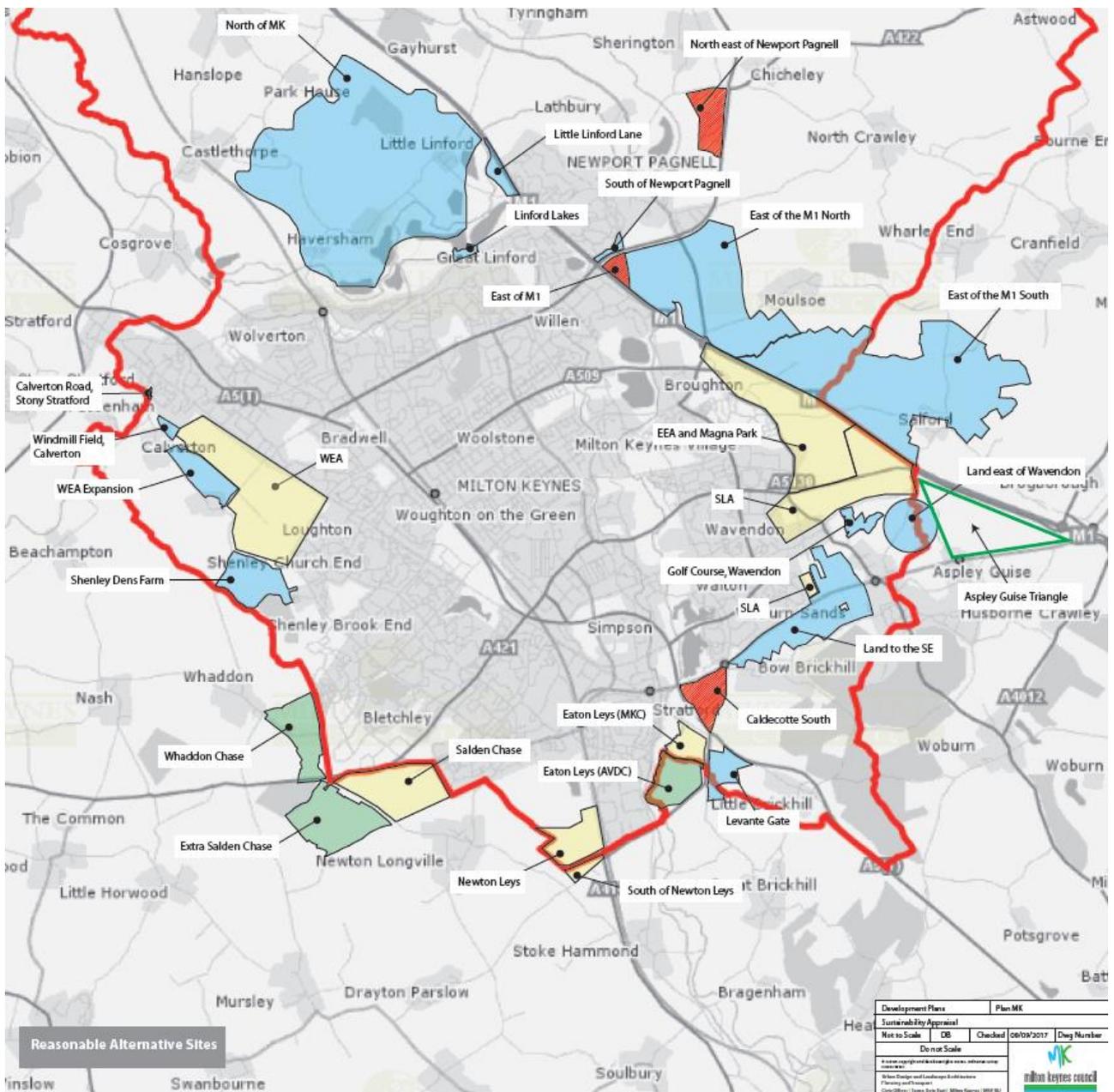
In summary, the **'initial' step of examining high-level issues/options** involved examining -

- Objectively assessed housing needs (OAHN) and arguments for providing for a higher or lower number of homes through Plan:MK.
- MK city-specific growth opportunities, including as established by the MK Futures 2050 Commission (2016); and growth issues, particularly in relation to the need to ensure a diverse mix of housing sites, including smaller sites, in order to ensure deliverability / a robust housing delivery 'trajectory'.
- Growth issues/opportunities elsewhere, i.e. away from the MK urban area.

As for the **'initial' step of examining site options**, this primarily involved: A) identifying a longlist of site options around the MK edge; and then B) undertaking an initial sift, or 'screen', in order to arrive at a shortlist. The longlist (A) is presented within Figure 1, whilst the screening process (B) is reported in Table 2.

N.B. the initial step of examining site options also involved establishing a longlist and then a shortlist of sites within the MK urban area. The Council's Strategic Housing Land Availability Assessment (SHLAA) was relied upon, i.e. it is not the case that any new or bespoke work was completed for the purposes of SA.

Figure 2: The longlist of MK urban edge site options



KEY

Plan:MK Site Options

- MK Borough boundary
- Housing or mixed use site option
- Employment site option
- Strategic commitment
- Nearby site option (non Plan:MK)

N.B. for context, the figure also shows:

- Employment site options;
- Major commitments
- Major commitments within Aylesbury Vale District; and
- Major site options within Aylesbury Vale District that are discussed as options within the Vale as Aylesbury Local Plan SA Report (2017), albeit none are supported by Aylesbury Vale District Council for allocation.

Table 2: Screening the longlist of MK urban edge housing site options

Ref	Name	No. homes	Commentary	Screening outcome
1	Calverton Road, Stony Stratford	21	<ul style="list-style-type: none"> <li>All are small sites (&lt;350 homes) that would involve 'piecemeal' expansion, rather than strategic expansion alongside delivery of new infrastructure; however, on the other hand, the small scale nature of these sites could indicate ability to deliver early in the plan period, thereby helping to support a robust housing trajectory for the borough / maintenance of a five year housing land supply.</li> </ul>	Out
2	Belvedere Farm 1	22		
3	Belvedere Farm 2	113		
4	Windmill Field, Calverton	148		
5	Linford Lakes	250	<ul style="list-style-type: none"> <li>All are ruled out on the basis of being subject to significant site specific constraints, including flood risk, harmful impact upon the character and appearance of a linear park and/or sites of high ecological importance to Milton Keynes and/or isolation from the existing urban area.</li> </ul>	
6	Little Linford Lane	344		
7	South of Newport Pagnell	500	<ul style="list-style-type: none"> <li>Not supported by the Newport Pagnell Neighbourhood Plan.<sup>1</sup></li> </ul>	
8	Levante Gate	625	<ul style="list-style-type: none"> <li>Sequentially less preferable than the other medium scale site options discussed below, as it would only link to the urban area upon completion of the permitted Eaton Leys site, and even then would not relate well.</li> </ul>	
9	Wavendon Golf Course	700	<ul style="list-style-type: none"> <li>Medium-scale urban extension site associated with notable issues, but worthy of more detailed examination.</li> </ul>	In
10	Caldecotte South	994	<ul style="list-style-type: none"> <li>Better suited to employment use.</li> </ul>	Out
11	WEA Expansion	1,000	<ul style="list-style-type: none"> <li>Medium-scale or large-scale urban extension sites associated with notable issues, but worthy of more detailed examination.</li> </ul>	In
12	Shenley's Den Farm	1,500		
13	Wavendon / Woburn ('eastern') broad area	1,500+		
14	South East MK	3,000		
15	East of M1 (north)	3,000+		
16	East of M1 (south)	3,000+		
17	North of MK	3,000+		

The 'interim' step of examining a refined list of site options involved subjecting the eight shortlist site options (sites 7 to 14 above) to an informal examination, under the SA topic headings (see Table 1, above). Conclusions are presented in Table 3. N.B. it is worth reiterating that this analysis was undertaken as an 'interim' step in the overall process, specifically with the aim of informing the development of reasonable spatial strategy alternatives (see discussion below).

<sup>1</sup> The site (known as 'Marsh End Road / Tongwell Lane') is assessed within the 'Collective Site Assessment' report submitted as Appendix 1 to the Newport Pagnell Neighbourhood Plan. See <https://www.milton-keynes.gov.uk/planning-and-building/planning-policy/newport-pagnell-neighbourhood-plan>

Table 3: Informal appraisal of the refined list (shortlist) of site options

Ref	Name	Conclusions
9	Wavendon Golf Course	Further expansion to the east, within the area of land bounded by the M1, A421 and the railway line, extending into Central Bedfordshire District, makes strategic sense in certain (socio-economic) respects, recognising transport infrastructure and the need to realise opportunities within the Oxford to Cambridge Corridor. However, this site is sequentially less preferable to the SE MK site discussed below. It is subject to a degree of constraint, with 'medium' landscape sensitivity (including due to evidence of a former parkland) <sup>2</sup> and three clusters of listed buildings (ten in total) adjoining the site. It would need to come forward subsequent to completion of the Strategic Land Allocation, <sup>3</sup> which inherently leads to a degree of uncertainty in respect of delivery timescale. Wavendon Golf Course is a smaller site that might be of insufficient scale to deliver new community infrastructure (e.g. primary school), hence growth could serve to 'load pressure' onto existing/proposed infrastructure in the vicinity. There is an understanding that extensive committed growth to the east of MK - within the Eastern Expansion Area and the Strategic Land Allocation - should be given the opportunity to 'bed in'.
11	WEA Expansion	Would extend the Western Expansion Area beyond the extent deemed to be suitable in 2005, at the time of allocation. The Calverton Road would form a new boundary; however, along this road is the string of three 'Weald Villages'. The site's 'red line boundary' indicates the potential for coalescence; however, the developer proposals suggest that this can be avoided (at least in respect of Upper Weald and Middle Weald) through greenspace buffers. The proposal is that extensive greenspace provision could be the first phase of a wider 'Calverton Valley Park' - an extension to the Ouse Valley strategic green infrastructure corridor, extending between Calverton and Whaddon. The proposal is to deliver sport and recreation facilities, but otherwise rely on community infrastructure within the WEA. The site is in two parts, with intervening land outside the control of the developer.

<sup>2</sup> Landscape Sensitivity Study to Residential Development in the Borough of Milton Keynes and Adjoining Areas (Gillespies, 2016)

<sup>3</sup> The Strategic Land Allocation was the main allocation made through the Core Strategy (2013).

Ref	Name	Conclusions
12	Shenley Dens Farm	<p>Unlike the two sites discussed above, this site would adjoin the existing urban edge, and indeed could link directly to an existing grid road. A large scheme is proposed that would deliver a primary school and a mixed use local centre. It is also noted that there is a good range of existing local facilities within walking/cycling distance, and central MK is closer to this area than it is to the eastern edge of MK. However, a scheme of this scale would lead to significant impacts to a landscape defined as having ‘high’ sensitivity.<sup>2</sup> In 2005 the Local Plan Inspector concluded, in respect of a virtually identical site: “[I]t would be visible from large parts of the Whaddon Valley. The Shenley Ridge is a significant feature in the landscape and I agree with the Llewelyn-Davies assessment that it is a feature that would form a logical and obvious boundary to development... I do not see the logic of regarding the Whaddon Valley as a possible long-term development area. To do so disregards the qualities of the valley landscape and the merits of the Shenley Ridge as a logical and clear long-term boundary.” The site also contains a listed farmhouse at its centre, and partially wraps around Oakhill Wood, a large ancient woodland (mostly replanted) that falls within the Whaddon Chase Biodiversity Opportunity Area (BOA).<sup>4</sup></p>
13	Wavendon/ Woburn (‘eastern’) broad area	<p>Further expansion to the east makes considerable strategic sense in certain (socio-economic) respects (see discussion above, under Site 7), and there would be merit to planning strategically for this area (e.g. designing in grid road extensions and strategic green buffers) rather than risking piecemeal development (a site for 200 homes is currently at appeal). However, this site is not currently being actively promoted in its entirety, and the Central Bedfordshire Local Plan is seemingly not supportive of cross boundary expansion in this location (a ‘series of linked villages’ within the Apsley Guise Triangle is proposed by the Central Bedfordshire Local Plan, 2017). It would need to come forward subsequent to completion of both the Strategic Land Allocation and Wavendon Golf Course, which inherently leads to a degree of uncertainty in respect of delivery timescale. Furthermore, the implication is that allocation would lead to a very large quantum of housing growth to the east of MK, over a c.20 year period. There is an understanding that current growth areas - the Eastern Expansion Area and the Strategic Growth Location - should be given the opportunity to ‘bed in’. The landscape here is also deemed more sensitive (‘medium’) than the landscape associated with Site 10 (‘low’).<sup>2</sup></p>

<sup>4</sup> BOAs are extensive areas that include a concentration of important habitat, and within which there will likely be a good degree of ecological connectivity over a relatively large scale. There is a need to maintain and increase ecological connectivity within BOAs, which can potentially be achieved through development, where this leads to targeted habitat creation, restoration or enhancement.

Ref	Name	Conclusions
14	South East MK	<p>Would mostly link to the existing urban edge, albeit much of the site would not link directly to the grid road network. Would extend MK close to the edge of Woburn Sands and Bow Brickhill; however, the landscape has 'low' sensitivity (albeit landscape assessment work suggests the need for 'small scale development')<sup>2</sup> and new communities would benefit from good access to the train stations at these two villages. The site extends across the railway line, which will result in the need for one or more new bridges. There is the potential for the preferred route of the Oxford to Cambridge Expressway (a major trunk road) to pass through this site; however, the risk is considered relatively low. Were the Expressway to pass through the site, then it would have considerable implications for masterplanning and phasing.</p>
15	East of the M1 (north)	<p>Potential to deliver a comprehensive new community, to include a secondary school and extensive employment land well located on the strategic road network. However, there are also potential draw-backs to this scheme from a communities perspective, recognising that the new community would be relatively poorly linked to CMK, with the M1 acting as a barrier. The site benefits from being well located to a motorway junction, with two existing road bridges and a footbridge; however, there would nonetheless be a need for extensive and costly infrastructure upgrades. The site is significantly constrained by flood risk associated with the river Ouzel, which would have implications for masterplanning.</p>
16	East of the M1 (south)	<p>On balance, sequentially less preferable the East of M1 (north) site (discussed above). On one hand it would benefit from being located on the edge of the Oxford to Cambridge Corridor; however, on the other hand: the site relates poorly to Newport Pagnell; is associated with a stretch of the M1 where there is no existing junction and few bridges; and would also place pressure on the Eastern Expansion Area / Strategic Land Allocation. There is some (more limited) flood risk.</p>
17	North of MK	<p>Sequentially less preferable the East of M1 (north) site (discussed above), for a number of reasons. Notably, there would be a need to bridge the extensive flood plain of the River Great Ouse / Linford Lakes; and growth to the north of MK would not relate well to the existing transport network (there is no M1 junction in the vicinity) or the Oxford to Cambridge corridor / Expressway proposals. There are also a greater degree of onsite landscape, heritage and biodiversity constraint to contend with, relative to sites 12 and 13.</p>

In light of the ‘initial’ steps and the ‘interim’ step discussed above, the Council, working in collaboration with AECOM, was in a position to **establish the reasonable alternatives**.

The objective was to establish a reasonable range of alternative combinations (or ‘packages’) of site options, where each package would provide for the required number of homes. It was recognised that there was a need to provide for at least the OAHN figure assigned by the MK Strategic Housing Market Assessment (SHMA, 2017), but that there was also a need to consider higher growth options. There are a number of arguments for allocating land sufficient to deliver above the assigned OAHN figure, including on the basis of wishing to provide for a ‘buffer’ as a contingency in the event unanticipated delivery problems, and wishing to demonstrate that growth related opportunities are fully examined.

It was determined that there were three spatial variables, with two or three options associated with each variable – see Table 4. This then led to the reasonable alternatives presented in Table 5.

*Table 4: Variables/options for the purposes of establishing spatial strategy alternatives*

Variable	Options	Notes
MK urban area	2,900 homes	The lower growth option would involve the 47 sites deemed deliverable or developable by the SHLAA, plus three additional sites. The higher growth option would involve the 50 sites (47 plus 3) discussed above plus 28 of the 61 sites deemed to be ‘not deliverable or developable’ only on the basis that residential development would be contrary to the existing policy designation.
	3,500 homes	In effect, this higher growth option involves addition of 28 sites currently designated for <b>open space, employment, commercial or community use</b> .
SE MK	1,500 homes	The capacity of the site is 3,000 homes; however, there is a risk of the Oxford to Cambridge Expressway passing through the site, which would lead to a delay in housing delivery (for the part of the site south of the railway line) and potentially reduce the capacity of the site.
	3,000 homes	The risk is considered relatively low; however, it is pragmatic to test the option of the site not delivering in full <b>within the plan period</b> (which was the preferred option at the Draft Plan MK stage).
East of M1	Nil homes	The capacity of the site is perhaps 5,000 homes; however, a maximum of 3,000 might be delivered in the plan period. Even delivery of 3,000 homes is highly uncertain, given the need for significant infrastructure upgrades. Government funding may become available to fund infrastructure upgrades; however, there is no certainty in this respect. It is therefore pragmatic to test the option of the site delivering fewer homes <b>within the plan period</b> .
	1,500 homes	
	3,000 homes	Were the site to deliver in the plan period (either 1,500 or 3,000 homes), it would also deliver <b>employment land</b> ; thereby negating the need for any other employment land allocation. Specifically, it would negate the need to allocate South of Caldecotte (see Figure 2).

Table 5: The reasonable spatial strategy alternatives

Supply	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7	Option 8
Completions/ commitments	21,850							
Windfall	1,330							
Urban area allocations	Low	High	Low	Low	High	High	Low	Low
SE MK allocation	Low	Low	Low	High	Low	High	Low	High
East of M1 allocation			Low		Low		High	Low
<b>Total supply</b>	27,580	28,180	29,080	29,080	29,680	29,680	30,580	30,580
<b>Target buffer</b>	<b>4%</b>	<b>6%</b>	<b>10%</b>	<b>10%</b>	<b>12%</b>	<b>12%</b>	<b>15%</b>	<b>15%</b>
Employment land allocation	S. Caldecotte	S. Caldecotte	E of M1	S. Caldecotte	E of M1	S. Caldecotte	E of M1	E of M1

N.B. Given the variables/options introduced in Table 4, there are 12 possible packages of site allocations. However, four of these would involve providing for a number of homes more than 15% above OAHN, and hence can be dismissed as unreasonable. This leaves eight reasonable spatial strategy alternatives.

**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.

Table 6: Summary alternatives appraisal findings

Topic	Rank of performance / categorisation of effects							
	Opt 1	Opt 2	Opt 3	Opt 4	Opt 5	Opt 6	Opt 7	Opt 8
Communities	2	3	2	2	3	3	★1	3
Deprivation								
Education	2	3	2	2	3	3	★1	3
Health	2	3	2	2	3	3	★1	3
Homes	7	6	4	5	2	3	★1	★1
Services	2	3	2	2	3	3	★1	2
Air quality	★1	★1	2	★1	2	★1	2	2
Biodiversity	=	=	=	=	=	=	=	=
Climate change	=	=	=	=	=	=	=	=
Heritage	=	=	=	=	=	=	=	=
Landscapes	=	=	=	=	=	=	=	=
Nat resources	=	=	=	=	=	=	=	=
Noise	★1	★1	2	★1	2	★1	2	2
Transport	★1	★1	2	★1	2	★1	2	2
Water	★1	★1	2	★1	2	★1	2	2
Business/ Economy/ Employment	2	2	★1	2	★1	2	★1	★

Topic	Rank of performance / categorisation of effects							
	Opt 1	Opt 2	Opt 3	Opt 4	Opt 5	Opt 6	Opt 7	Opt 8
<b>Conclusion</b>								
<p>The first point to note is that ‘significant positive’ effects are predicted for all alternatives in respect of ‘Housing’ and ‘Business/Economy/Employment’. This is because targets established by the Strategic Housing Market Assessment (SHMA) and Employment Land Needs Assessment (ELNA) would be met under all options. Conversely, all alternatives would result in ‘significant negative’ effects in respect of ‘Natural resources’. This is because all alternatives would involve growth at the South East MK site, which mostly comprises ‘best and most versatile’ agricultural land.</p> <p>Focusing on the relative merits of the alternatives, the first point to note is that Option 7 performs well in terms of a range of socio-economic objectives. This is because it would involve a high growth strategy, with a focus of growth to the east of the M1, where the assumption is that there would be the potential to deliver a ‘sustainable’ new community, to include a secondary school and employment delivered alongside housing. Options involving growth to the east of the M1 (Options 3, 5, 6 and 7) are also judged to perform well in terms of ‘Business/Economy/Employment’ objectives, recognising the potential to deliver significant new employment land (and in particular warehousing, for which there is a need locally).</p> <p>However, Options involving growth to the east of the M1 perform poorly in other respects. In particular, issues/impacts are predicted in terms of ‘Transportation’, ‘Air quality’ and ‘Noise’, given that the site’s relationship with the M1, which would inevitably act as a barrier to movement, and be a source of pollution. Also, flood risk is a constraint to development of the site, given the river Ouzel.</p> <p>Aside from the matter of growth to the east of the M1, the other variables across the reasonable alternatives are: growth at South East MK (all within the plan period, or phased growth); allocation of urban open space sites (a restrained approach, or a more permissive approach) and the matter of the South of Caldecotte employment site (allocation assumed only under options not involving growth East of the M1). The appraisal highlights a number of issues/impacts, in respect of these variables/options; however, these tend to be secondary to those associated with growth to the East of the M1. Notably–</p> <ul style="list-style-type: none"> <li>• South East MK – this site is relatively unconstrained, although there is an argument to suggest that growth should be phased, such that some delivery is post 2031, recognising the quantum of committed growth to the east of MK, at the Eastern Expansion Area and the Strategic Land Allocation. This issue/impact is uncertain, and hence does not have a bearing on the ranking of alternatives presented above. Also, there is arguably merit to progressing the whole site (3,000 homes) within the plan period as it will enable delivery of new road infrastructure (a bridge over the railway) to the benefit of the wider transport network. <ul style="list-style-type: none"> <li>– Secondary school delivery is another important issue for the SE MK site. Initial indications are that a new (relatively small) secondary school would be needed, as it is unlikely there are opportunities to expand existing secondary schools in the area to accommodate the approximately 5FE of pupils the development would generate. There will be a need for further work to confirm ability to deliver the necessary schools capacity (and it is noted that Policy is proposed, through INF1 and SD11).</li> </ul> </li> <li>• Urban area – it is recognised that loss of urban open space would impact on the amenity of residents. This issue/impact has a bearing on the ranking of the alternatives (i.e. Options 2, 5 and 6 perform poorly in terms of several objectives); however, it is difficult to conclude on impact significance.</li> <li>• South of Caldecotte employment allocation – this site is relatively unconstrained, although it is noted that it falls within a broader area identified as having ‘medium’ landscape sensitivity (in comparison, South East MK has ‘low’ sensitivity).</li> </ul> <p>Finally, there is a need to highlight the higher growth options as performing well from a ‘Housing’ perspective. An overriding consideration relates to the extent of the contingency/buffer, over-and-above the 26,500 objectively assessed housing need (OAHN) figure, that is put in place, recognising: A) the need to ensure that OAHN is provided for in practice; and B) the possibility of providing for ‘above OAHN’ in order to more fully meet affordable housing needs. This consideration dictates the order of preference assigned to the alternatives. However, another important objective relates to providing for a good mix of housing sites (e.g. in respect of size), with a view to ensuring a robust ‘trajectory’ of housing delivery.</p> <p>In conclusion, it is clear that all of the spatial strategy alternatives are associated with ‘pros and cons’. The Council must consider how best to ‘trade-off’ between competing objectives.</p>								

## Establishing the preferred option

The Council's preferred approach is Option 4, which the appraisal finds to have 'pros and cons', as per all other options. The following text, which is provided by the Council explains the reasons for supporting Option 4 -

*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 in the plan period, should infrastructure be in place).*

# APPRAISAL FINDINGS AT THIS STAGE

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

## Communities

The proposal is to support two large scale new developments, which should deliver new community facilities; however, delivery at both is somewhat uncertain, and there is a degree of uncertainty regarding the extent/nature of community facilities to be delivered at the South East MK proposed allocation (including in relation to secondary school provision). The proposal to follow a restrained approach to growth within the MK urban area, with a focus of housing growth within CMK and Campbell Park, is broadly supported. The proposed thematic / development management type policies are all strongly supported, including on the basis that they propose building upon the special characteristics of MK communities, as established over the past fifty years. Overall, the plan performs well, but it is not possible to conclude 'significant' positive effects.

## Deprivation

The proposed spatial strategy has limited implications for the achievement of 'deprivation' related objectives, although the effect *may* be to deliver 'above OAHN', which in turn would involve meeting affordable housing needs more fully, which in turn would have positive implications for 'deprivation' objectives. Perhaps the most notable element of the Proposed Submission Plan is the policy support for Central Bletchley Urban Design Framework, with policy criteria proposed that will help to guide future planning decisions. Overall, the plan performs well, but it is not possible to conclude 'significant' positive effects.

## Education

The proposal is to support two large scale new developments, which should deliver new community facilities, and there is a specific policy requirement for the East of M1 site to deliver a new secondary school; however, delivery at both is somewhat uncertain. The proposed thematic / development management type policies are all strongly supported, in particular, Policy EH1 (Provision of New Schools – Planning Considerations) and Policy EH2 (Provision of New Schools – Site Size and Location). Overall, the plan performs well, but it is not possible to conclude 'significant' positive effects.

## Health

Policy SD1 (Place-Making Principles for Development) and other thematic / development management type policies should ensure development of sustainable new communities, with positive implications for health determinants. The proposal to follow a restrained approach to growth in the urban area, with limited development of existing urban open spaces, is also supported. Overall, the plan performs well, but it is not possible to conclude 'significant' positive effects, recognising the wide-ranging nature of health determinants.

## Housing

The effect of the plan should be to provide for OAHN, and it may be that the effect is to provide for 'above OAHN' and thereby more fully provide for the affordable housing needs that exist. Furthermore, the plan provides for the accommodation needs of Gypsies and Travellers, and thematic policies / development management type policies are proposed to ensure a good housing mix, and ensure that specialist accommodation needs are provided for. On this basis, **significant positive effects** are predicted.

## Services and facilities

The proposal is to support two large scale new developments, which should deliver new community facilities, although there is some uncertainty at this stage, ahead of further work (e.g. to establish requirements) and masterplanning. Policy SD1 (Place-Making Principles for Development) - establishes a range of important principles, and other thematic / development management type policies are also supported, including Policy CC5 (New Community Facilities), Policy CC3 (Protection of Community Facilities) and Policy CC2 (Location of Community Facilities). Overall, the plan performs well, but it is not possible to conclude 'significant' positive effects.

## Air quality

Whilst air pollution is not a significant issue for the borough as a whole, there is nonetheless a need to minimise the number and distance of trips by non-electric private car, in order to avoid worsened air pollution, and the risk of poor air quality hotspots developing (such that further AQMAs might need to be designated). In this respect, the proposed spatial strategy is broadly supported. As discussed below, under 'Transportation', both the SE MK strategic urban extension, and the proposed new strategic employment site at Caldecotte South, are well located in transport terms, given proximity to rail stations on East-West Rail; whilst there should be good potential for the East of MK proposal (delivery of which is uncertain) to achieve a good degree of trip internalisation (i.e. there should be good potential to support trips by walking/cycling, and minimise trips offsite). Overall, whilst there could be some localised worsening of air quality, 'significant' negative effects are not predicted.

## Biodiversity

Proposed development sites are relatively unconstrained, and a robust development management policy framework is proposed, in accordance with existing objectives, e.g. the need to reflect / build upon the linear parks network. Overall, the plan performs well, but it is not possible to conclude 'significant' positive effects.

## Climate change

There may well be an opportunity to deliver low carbon heat or electricity as part of the East of M1 scheme, recognising its scale; however, no such measures have been proposed to date, plus delivery of the site is uncertain at the current time. The proposed thematic / development management policy framework should help to ensure that opportunities are examined fully, and capitalised upon where possible; however, it is recognised that viability considerations will often be prohibitive in practice. Overall, the plan performs moderately well, with there being the potential for more stringent policy to be established (as is invariably the case). Significant effects are not predicted, recognising that climate change mitigation is a global issue.

## Cultural heritage

In conclusion, the plan performs well, recognising that development is generally directed to areas with limited heritage constraint, and there is support for 'renaissance' within CMK; however, significant positive effects are not predicted.

## Landscape

In conclusion, the plan performs well, recognising that development is generally directed to areas with limited landscape constraint, albeit the South of Caldecotte proposed strategic employment site may be subject to a degree of constraint. Overall, significant effects are not predicted.

## Natural resources

Development of the South East MK site will result in the loss of best and most versatile agricultural land, and so there is a need to conclude that the plan will result in **significant negative effects**.

## Noise pollution

The proposal is to locate new homes in proximity to significant sources of noise pollution; however, there will be good potential to avoid/mitigate negative effects, through masterplanning and design measures. As such, significant negative effects are not predicted.

## Transport

Transport modelling work has completed, with the general conclusion reached that Plan:MK will have limited impact on the baseline, recognising that the baseline situation is one whereby there is a large amount of committed housing and employment growth. The proposed allocations at South East MK and South of Caldecotte are broadly supported, but it is difficult to conclude that the proposed East of M1 site performs well, from a transport perspective (albeit there is the potential to support delivery of a mass transit route between CMK and Cranfield University). A robust policy framework is proposed, which should help to ensure that new schemes are delivered in such a way that per capita distance travelled by private (petrol/diesel) cars is minimised. Overall, the plan has somewhat mixed effects, with there being no basis upon which to conclude 'significant' effects, either positive or negative.

## Water and flood Risk

The proposed East of M1 strategic allocation is constrained by flood risk; however, delivery of this site is uncertain, and in any case there will be good potential to avoid/mitigate flood risk through careful masterplanning. Significant negative effects are not predicted.

## Businesses, economy and employment

In **conclusion**, the plan performs well, recognising that provision is made for delivery of employment land over-and-above what is required. **Significant positive effects are predicted**.

## Summary conclusions

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 the M1 (distance and separation from CMK).

A number of specific recommendations are made within the appraisal text (see bold 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.

## Next steps

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

### Plan finalisation

Subsequent to publication, the main issues raised will be identified and summarised by the Council, who will then consider whether the plan can still be deemed to be 'sound'. Assuming that this is the case, the plan (and the summary of representations received) will be submitted for Examination. At Examination a government appointed Planning Inspector will consider representations and other evidence, before determining whether the plan is sound. If found to be 'sound' the plan will be formally adopted.

### Monitoring

The Proposed Submission Plan includes a 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 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.