

**Milton Keynes Council**

**Site Allocations Plan Proposed Submission Document**

**Draft Sustainability Appraisal Report**

**August 2016**

## **1. Introduction**

### **Background**

- 1.1. The Site Allocations Plan process began following the examination of the 2013 Core Strategy. The Core Strategy includes a housing trajectory that plans for lower delivery rates in early years before large expansion areas deliver peak rates later in the plan period. The inspector concluded that a Site Allocations Plan should subsequently be prepared to 'top-up' and provide flexibility in housing supply in earlier years of the plan period, to ensure it remains above the required five years.
- 1.2. An Issues & Options consultation was held in September 2014. This covered various factors the Site Allocations Plan would need to address as well as incorporating a call for sites.
- 1.3. Those sites that were newly promoted were intended to be subject to their own high-level consultation in early 2015. However, this 'Additional Sites' consultation was withdrawn following concerns about the Council's own land assets.
- 1.4. An Emerging Preferred Options consultation was subsequently held in October 2015. This summarised the Council's initial site assessment findings and consulted on the methodology proposed for site selection.
- 1.5. The findings of this Sustainability Appraisal should be read alongside the draft proposed submission plan and, in combination with the consultation statement that will be submitted with the plan, will constitute a 'site selection' report. Both documents are being consulted on before they are finalised alongside other documents required for submission to the Secretary of State.

### **Land supply – how many allocations are needed?**

- 1.6. The Council's latest land supply report (based on April 2016 completion rates) concluded that land supply is 4.8 years, or a deficit of 479 dwellings.
- 1.7. This therefore represents the minimum quantum of development that the Site Allocations Plan should seek to address. It is considered prudent however to allocate beyond this figure to account for the possibility that either new allocations or sites already making up an element of supply will not be delivered as expected (although it is important to note that in respect of existing sites, a discount to forecasts is made to allow for this).

## **2. Legislative requirement for Sustainability Appraisal**

- 2.1. European legislation (the 'Strategic Environmental Assessment Directive' (SEA Directive)) requires local authorities to prepare a Strategic Environmental Assessment (SEA) of the effects of certain plans and programmes on the environment, which includes development plans. The SEA Directive was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004.
- 2.2. Under the Planning and Compulsory Purchase Act 2004 (Section 19 and Section 39) (the Act), Sustainability Appraisal (SA) is a mandatory part of the plan making process. The process of undertaking SA assists planning authorities to fulfil the objective of integrating sustainable development principles into the plan making process. The Sustainability Appraisal predicts and assesses the social, economic and environmental effects of the options and allows for a

comparison of these against the alternatives considered. The aim of the SA Report is to fulfil requirements of both the Act and the SEA Directive, and has been produced in accordance with the NPPF. This SA Report has been prepared by officers within the Development Plans Team of Milton Keynes Council.

- 2.3. The requirement to carry out SA and Strategic Environmental Assessment (SEA) are distinct. The latter assessment is only concerned with environmental impacts as opposed to social, economic and environmental impacts within the SA. There is also more prescriptive guidance and tasks that need to be followed in order to meet the SEA Directive's requirements.
- 2.4. However, it is possible to satisfy both through a single appraisal process. This SA Report will therefore include the elements required by the SEA Directive. This is achieved through signposting the places in the SA Report where the information required by the directive is provided. The table below shows the locations in this Report which meet the Directive (referring in particular to Annex I which specifies the information required by Article 5(1)).

**Table 1. Links between SEA requirements and Sustainability Appraisal**

| <b>SEA Directive Requirements</b>   | <b>Where covered in SA Report</b>   |
|---|---|
| (a) Provide an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes  | Scoping Report,<br>Main SA Report (Tasks B1 and B2)   |
| (b) Provide information on the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme  | Scoping Report  |
| (c) Provide information on the environmental characteristics of areas likely to be significantly affected   | Scoping Report  |
| (d) Provide information on any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance   | Scoping Report  |
| (e) Provide information on the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation                                    | Scoping Report  |
| (f) Provide information on the likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between | Main SA Report (Tasks B2 - B4, Appendix 3).<br>Secondary and synergistic effects will be identified where possible, however these are likely to be rare, given the Plan is intended to provide a short-term boost to housing land supply by |

|   |  |
|---|--|
| the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects)  | allocating a range of smaller sites to complement the larger strategic expansion areas that make up the bulk of housing land in Milton Keynes All effects of the Plan are assumed to be short to medium. |
| (g) Provide information on the measures envisaged to prevent, reduce, and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme  | Main SA Report (Task B4)   |
| (h) Provide an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information | Main SA Report (Task B2 - B3, Appendix 3)  |
| (i) Provide a description of measures envisaged concerning monitoring in accordance with Article 10   | Main SA Report (Task B5)   |
| (j) Provide a non-technical summary of the information provided under the above headings  | Non-technical summary provided   |

### Habitats Regulations Assessment

- 2.5. Habitats Regulations Assessment (HRA) is required by the Conservation of Habitats and Species Regulations 2010 (as amended) and the Habitats Directive (Council Directive 92/43/EEC).
- 2.6. HRA is the assessment of the potential impacts that implementing a plan or policy will have on European wildlife sites. Its purpose is to consider the impacts of a land-use plan against conservation objectives of the site and to ascertain whether it would adversely affect the integrity of the site. Plans can only be permitted having ascertained that there will be no adverse effects on the integrity of European wildlife sites (unless there are ‘imperative reasons of overriding public interest’).
- 2.7. The Site Allocations Plan proposes to allocate 21 relatively small residential sites throughout the Milton Keynes urban area. The Plan has been prepared pursuant to the 2013 Core Strategy, which is the principal spatial plan and Development Plan Document in Milton Keynes Borough.
- 2.8. A Habitats Regulations Assessment (HRA) Screening of the Core Strategy has previously been undertaken. Milton Keynes lies in an area void of any Natura 2000 sites. The nearest European site is the Chiltern Beechwoods to the south of the Borough. Natural England are of the view that the site would not be affected by Milton Keynes planning policy due to the distance of the site from Milton Keynes and there being no obvious impact pathways.
- 2.9. However, in liaison with Natural England, the Council has identified two sites that could potentially be affected by the Core Strategy, and other Local Development Documents, due to the pathway provided by the River Great Ouse, which feeds in to Natura 2000 sites. These

sites are: Ouse Washes Special Area of Conservation / Special Protection Areas and Portholme Special Area of Conservation.

- 2.10. As a result of the screening process, it has been concluded that any effect on the flow of water and subsequent impact on the Natura 2000 sites from policies and proposal in the Milton Keynes Core Strategy and other 'in-combination' plans and projects is likely to be minimal and that the Core Strategy should not be subject to a full Appropriate Assessment. It is considered that these findings are still robust and have not become outdated by further information or developments and therefore there is no need to subject the Site Allocations Plan to a full Appropriate Assessment.

### 3. Sustainability appraisal process

#### Stage A – Scope

- 3.1. The first stage of the Sustainability Appraisal was the review of plans, policies and programmes relevant to the scope of the Site Allocations Plan. A Scoping Report was prepared in August 2013 and consulted with the SA Consultees (English Heritage, Environment Agency and Natural England) and then revised to reflect the comments received. The SA Scoping Report represents Stages A1-A4 of the SA process, as shown in Figure 1 on page 6.
- 3.2. The SA Scoping Report identified a range of sustainability issues for Milton Keynes and proposed 13 sustainability objectives that have been used throughout the process to assess the Site Allocations Plan. These objectives are included in the table below:

**Table 2. SA Objectives**

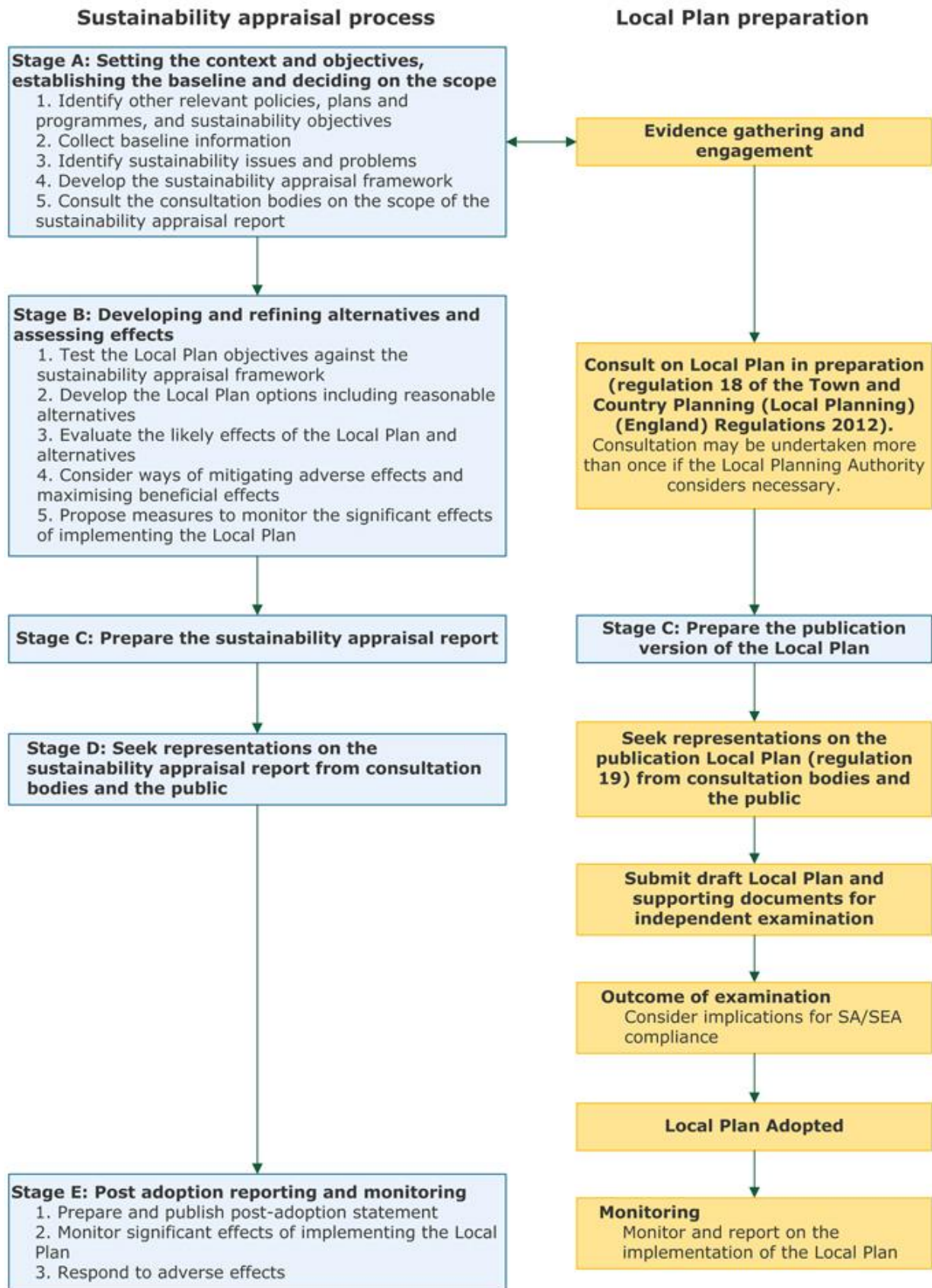
| <b>Social</b>        |   |
|----------------------|---|
| SA1                  | Ensure that everyone has the opportunity to live in an affordable, sustainably constructed, decent home.  |
| SA2                  | Reduce crime, poverty, social exclusion and inequalities in health, closing the gap between Milton Keynes' most deprived areas and the average. |
| SA3                  | Improve availability and accessibility of key services and facilities   |
| <b>Environmental</b> |   |
| SA4                  | Make efficient use of land, increasing the use of brownfield sites and encouraging urban renaissance  |
| SA5                  | Continue to maintain and improve local air quality and limit noise, soil and light pollution  |
| SA6                  | Encourage the use of more sustainable modes of travel   |
| SA7                  | Conserve and enhance the Borough's biodiversity and landscape character   |
| SA8                  | Conserve and enhance the Borough's heritage and cultural assets, and the character of the built environment                                     |
| SA9                  | Maintain and improve the Borough's water quality and reduce the risk of flooding  |
| SA10                 | Encourage the efficient use of energy, water and other natural resources, throughout the life of the development                                |
| <b>Economic</b>      |   |
| SA11                 | Ensure good access to employment opportunities to allow all residents to benefit from economic growth   |
| SA12                 | Sustain economic growth and competitiveness across the Borough  |

|      |  |
|------|--|
| SA13 | Create vibrant communities, and improve the vitality and viability of town, local and district centres |
|------|--|

**Difficulties encountered in compiling the information or carrying out the assessment**

- 3.3. In preparing the SA Report the best data available at the time has been used, including any relevant updates to the Scoping Report. The number of sites assessed has been one of the greatest challenges in carrying out the Sustainability Assessment. In particular, the process of obtaining and collating baseline data specifically relating to capacity assessment of existing services and facilities in the vicinity of the proposed sites has been time consuming.
- 3.4. Gathering data to inform the planning process is a continual process and it has been assumed that any information gaps will be addressed as part of detailed site development, in order to identify potential sustainability issues.

**Figure 1. The key stages of Local Plan preparation and their relationship with the sustainability appraisal process (National Planning Practice Guidance, DCLG)**



**Stage B – Developing and refining alternatives and assessing the effects**

**Testing the Plan objectives against the SA framework (Task B1)**

- 3.5. Based on the Objectives already established in the adopted Core Strategy and the principles in the NPPF, the following Objectives are proposed for the Site Allocations Plan:
- 1) To allocate sufficient housing sites to enable Milton Keynes Council to meet its Core Strategy housing target and maintain a deliverable five-year land supply ahead of a review of the housing target and development strategy through Plan:MK.
  - 2) To allocate land that will ensure delivery of a range of house types, to provide for existing residents who need a new home and those who want to make Milton Keynes their home.
  - 3) To ensure the efficient use of land by encouraging the development of previously developed sites and considering whether there are opportunities to re-designate existing non-housing land allocations which are no longer needed for, or suitable for, their proposed use.
  - 4) To ensure that any greenfield development is necessary and planned in a sensitive manner having respect for the local landscape.
  - 5) To allocate land which is well located in relation to key day to day facilities and that maximises opportunities for sustainable movement.
  - 6) To set out policies which guide development on specific sites, ensuring development respects the context of the area in which it is located, whilst taking advantage of any specific opportunities presented by the site.
  - 7) Where appropriate, to allocate sites that maximise opportunities to support delivery of wider Core Strategy objectives including:
    - extending linear parks
    - regenerating older estates
    - encouraging sustainable transport and movement
    - protecting, maintaining and enhancing significant environmental and heritage assets
    - developing an International Sporting City
- 3.6. Table 3 below shows the potential compatibility and conflicts between the SA objectives and the proposed Site Allocations Plan objectives.



**Table 3. SA Objectives vs Site Allocations Plan Objectives**

|                 |   | SA Objectives |        |        |       |        |        |        |        |        |        |        |        |        |
|-----------------|---|---------------|--------|--------|-------|--------|--------|--------|--------|--------|--------|--------|--------|--------|
|                 |   | 1             | 2      | 3      | 4     | 5      | 6      | 7      | 8      | 9      | 10     | 11     | 12     | 13     |
| Plan Objectives | 1 | Green         | Yellow | Red    | Green | Yellow | Yellow | Yellow | Yellow | Green  | Yellow | Green  | Green  | Green  |
|                 | 2 | Green         | Green  | Yellow | Green | Yellow | Yellow | Yellow | Yellow | Yellow | Yellow | Yellow | Green  | Green  |
|                 | 3 | Yellow        | Yellow | Yellow | Green | Yellow | Green  | Green  | Yellow | Green  | Green  | Yellow | Green  | Green  |
|                 | 4 | Yellow        | Yellow | Yellow | Green | Yellow | Yellow | Green  | Yellow | Green  | Green  | Yellow | Yellow | Yellow |
|                 | 5 | Yellow        | Green  | Green  | Green | Green  | Green  | Yellow | Yellow | Yellow | Green  | Green  | Yellow | Green  |
|                 | 6 | Yellow        | Green  | Yellow | Green | Yellow | Green  | Green  | Green  | Green  | Green  | Green  | Green  | Green  |
|                 | 7 | Green         | Green  | Green  | Green | Yellow | Green  | Green  | Green  | Green  | Green  | Green  | Yellow | Green  |

Potential compatibility  
 Potential neutrality  
 Potential conflict

3.7. The role of the Site Allocations Plan is to allocate appropriate sites for housing to contribute to the overall housing requirement as set out in the Core Strategy and to ‘top-up’ and provide flexibility in housing supply in earlier years of the plan period, to ensure it remains above the required 5 years.

3.8. This objective of the Plan is considered to be broadly compatible or neutral with the SA objectives. The only area of potential conflict is of the Plan’s objective on availability and accessibility of key services and facilities. The small-scale nature of the Plan’s allocations means that contributions to new services and facilities will be limited.

**Developing the Plan options including reasonable alternatives (Task B2)**

3.9. An Issues & Options consultation ran from September to November 2014 and covered various aspects relating to the Site Allocations Plan. It contained details of 50 sites that were already known to the Council through its Strategic Housing Land Availability Assessment and invited landowners, developers and the general public to submit other potential sites for the Council to look at.

3.10. The response to this ‘call for sites’ was unprecedented with details of over 100 ‘new’ sites received. Once sites that did not follow the settlement hierarchy were discounted these additional sites were reduced to 69, with 55 of these being within the urban area.

3.11. In order to gather high-level feedback about these additional sites it was considered that they should be subject to the same public exposure as the original 50 sites. An ‘Additional sites’ consultation was therefore programmed for February 2015. However, this ‘Additional Sites’ consultation was withdrawn following concerns about the Council’s own land assets.

3.12. In the period since the Issues & Options consultation, several Neighbourhood Plans in the rural area have made excellent progress. Most significantly Newport Pagnell Neighbourhood Plan has been adopted whilst Olney and Sherington are progressing towards draft versions.

3.13. There was strong support from respondents to the Issues & Options consultation for the Site Allocations Plan to recognise the primacy of Neighbourhood Plans. Therefore, to avoid

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prejudicing Neighbourhood Plans, the Emerging Preferred Options Site Allocations Plan was focused only on urban sites. It should be noted, that the Site Allocations Plan is a short-term 'top up' plan. More strategic policy documents like Plan:MK will be able to look at the longer term and revisit sites that have issues yet are not fundamentally unsustainable.

- 3.14. There were 61 sites in the urban area that have been put through 3 stages of assessment covering 37 criteria. Only 4 of these sites did not pass Stage 1 of the assessment as they were either too small (delivering 10 or fewer dwellings), or would have significant environmental impacts, or due to clear conflicts with national and local policy.
- 3.15. Out of the 61 sites, 36 of them were fully assessed and found to have an unacceptable social, economic or environmental impact. In reaching its final choice of sites, the Council has refined its sifting approach to reflect unavoidable impact on health capacity. Sites were discounted from allocation if a 'red' rating has been identified against any criteria other than health. Table 5 on page 12 provides reasons for why those sites were not taken forward to the Proposed Submission stage. Further information on this is provided in Appendix 3 of the SA Report.
- 3.16. The site assessment template used to appraise individual sites is included in Appendix 1. This was itself subject to consultation as part of the Issues and Options stage in September 2014 and was amended according to feedback received during the consultation.
- 3.17. Table 4 below outlines how the Sustainability Objectives link to the site assessment template in order to ensure individual allocations represent sustainable development.

**Table 4. Links between SA objectives and site assessment criteria**

| Ref | SA Objective  | Relationship to individual assessment criteria   | SEA Topic   |
|-----|---|--|---|
|     | <b>Social</b>   |  |   |
| SA1 | Ensure that everyone has the opportunity to live in an affordable, sustainably constructed, decent home.  | No individual assessment – collectively assessment is aimed at ensuring quantity and quality of homes that will meet this objective.   | Population<br>Material Assets<br>Social   |
| SA2 | Reduce crime, poverty, social exclusion and inequalities in health, closing the gap between Milton Keynes' most deprived areas and the average. | Criteria on 'site specifics' in stage 2 considered whether development might improve issues in the local area (e.g. appearance).<br><br>Proximal access to facilities, including health, formed the basis of most stage 3 criteria.                            | Population<br>Human Health<br>Material Assets<br>Social<br>Economy and Employment                         |
| SA3 | Improve availability and accessibility of key services and facilities   | Proximal access to facilities, including health, formed the basis of most stage 3 criteria.  | Human Health<br>Population  |
|     | <b>Environmental</b>  |  |   |
| SA4 | Make efficient use of land, increasing the use of brownfield sites and encouraging urban renaissance  | Brownfield land given a 2x weighting in stage 3 of assessment.   | Landscape<br>Biodiversity<br>Flora and Fauna<br>Soil<br>Energy and resource efficiency<br>Material Assets |
| SA5 | Continue to maintain and improve local air quality and limit noise, soil and light pollution  | Impact on and of neighbouring uses considered under stage 2 of assessment. Stage 3 includes an assessment of agricultural land quality.  | Air<br>Soil<br>Human Health   |
| SA6 | Encourage the use of more sustainable modes of travel   | Proximal access between potential residential sites and places of work/school etc. used throughout stage 3 of assessment to identify development sites that will encourage walking or cycling.<br><br>Separate criteria in stage 3 gave higher scores to sites | Human Health<br>Climatic Factors<br>Transport<br>Social   |

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|      |  |  |   |
|------|--|--|---|
|      |  | close to existing bus/train stops.   |   |
| SA7  | Conserve and enhance the Borough's biodiversity and landscape character  | Impact on landscape and biodiversity both assessed under Stage 2.  | Landscape and Townscape Quality<br>Biodiversity<br>Flora and Fauna      |
| SA8  | Conserve and enhance the Borough's heritage and cultural assets, and the character of the built environment      | Impact on heritage and character assessed under Stage 2.   | Material Assets<br>Cultural Heritage<br>Landscape and Townscape Quality |
| SA9  | Maintain and improve the Borough's water quality and reduce the risk of flooding                                 | Flood risk a component of stage 1. Site-specific drainage issues also considered under stage 2.  | Water and Flooding<br>Material Assets<br>Energy and resource efficiency |
| SA10 | Encourage the efficient use of energy, water and other natural resources, throughout the life of the development | No individual assessment as the impact on this objective does not intrinsically vary according to the specific characteristics of each site. Instead implementation will be controlled through prescriptive policies like Policy D4 of the Local Plan. | Material Assets<br>Climatic Factors<br>Energy and resource efficiency   |
|      |  |  |   |
|      | <b>Economic</b>  |  |   |
| SA11 | Ensure good access to employment opportunities to allow all residents to benefit from economic growth            | Proximal access to employment areas considered under stage 3 of assessment.  | Population<br>Social<br>Economy and Employment                          |
| SA12 | Sustain economic growth and competitiveness across the Borough   | Impact on potential employment sites considered under 'existing use' criteria in Stage 3. Impediments to potential infrastructure that will support growth also picked up under Stage 3.   | Population<br>Social<br>Economy and Employment                          |
| SA13 | Create vibrant communities, and improve the vitality and viability of town, local and district centres           | Impact on and of neighbouring uses identified in stage 3 criteria. Support to town, local and district centres picked up indirectly through Stage 3 proximal scores.   | Population<br>Cultural heritage<br>Social                               |

**Table 5. List of rejected sites**

| Ref | Name  | Location                      | Negative effects and their relation to SA Objectives   |
|-----|---|-------------------------------|--|
|     | <b>Sites possibly suitable in longer term</b> |                               |  |
| U20 | Wolverton Railway Works                       | Wolverton                     | Current schools' capacity prohibits allocation (Schools)   |
| U83 | Hewlett Packard East site                     | Wavendon Gate (Expansion)     | Housing development would see the loss of part of a high-value employment allocation (Existing use)  |
| U45 | Station Square                                | Central MK                    | Site allocated as open space on the Proposals Map. In the CMK Neighbourhood Plan it is washed over by a 'classic infrastructure' notation indicating its protection (Open space) |
| U21 | Wolverton Mill Site G                         | Wolverton Mill                | Current schools' capacity prohibits allocation (Schools)   |
| U72 | Shenley Wood Site E                           | Shenley Wood                  | Housing development would see the loss of a high-value employment allocation (Existing use)  |
| U42 | Caldecotte Site C                             | Caldecotte                    | The site is allocated for employment purposes is potentially required to facilitate access through/over the forthcoming East-West Rail upgrade (Existing use)                    |
| U30 | Land off Ridgeway                             | Stony Stratford - (Expansion) | The site is in the open countryside and would not form a logical extension   |
|     | <b>Unsuitable sites</b>                       |                               |  |
| U84 | 1 Glyn Square, Wolverton                      | Wolverton                     | Access is likely to be a major constraint to residential development (Access)<br>Current schools' capacity prohibits allocation (Schools)  |
| U86 | Garages West of Rowle Close                   | Stantonbury                   | The site is available, but the long lease terms would require variation. The surrounding green space is not registered to any owner (Ownership)                                  |

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|     |                             |               |   |
|-----|-----------------------------|---------------|---|
|     |                             |               | The site does not have a health centre with capacity within 1km (Health)  |
| U87 | Garages East of Rowle Close | Stantonbury   | The site is available, but the long lease terms would require variation. The surrounding green space is not registered to any owner (Ownership)<br><br>The site does not have a health centre with capacity within 1km (Health)   |
| U70 | Land at Oakgrove school     | Middleton     | Access should only be taken from Far Holme and due to the ownership issues this may not be possible (Access)<br><br>The site has no existing use although is allocated for community facility purposes and is subject to a restrictive covenant in that regard. This would require lifting before the site could be considered for alternative uses (Existing use)<br><br>There is a restrictive covenant on the land that would require lifting before the site can be considered available for any uses not associated with education (Ownership) |
| U68 | Kents Hill Site B           | Kents Hill    | The recent development brief process has indicated that site will be delivered for school purposes instead, the need for which would obviously be prejudiced if the site came forward for residential development (Existing use/future use)<br><br>According to NHS England data, the site does not have a surgery with capacity within 1km. (Health)<br><br>Development of the site would impede the delivery of a proposed new secondary school (Impede infrastructure)   |
| U69 | Kents Hill Site E           | Kents Hill    | The recent development brief process has indicated that site will be delivered for school purposes instead, the need for which would obviously be prejudiced if the site came forward for residential development (Existing use/future use)<br><br>According to NHS England data, the site does not have a surgery with capacity within 1km. (Health)<br><br>Development of the site would impede the delivery of a proposed new secondary school (Impede infrastructure)   |
| U71 | Land at the Walnuts         | Redhouse Park | The site is adjacent to the M1 motorway and any potential development would be entirely within  |

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|     |                           |                 |  |
|-----|---------------------------|-----------------|--|
|     |                           |                 | <p>the 200m buffer therefore unacceptable in terms of air and noise pollution (Neighbouring use)</p> <p>The site is used for private equestrian purposes but is allocated for employment. Housing development would see the loss of a high-value employment allocation (Existing use)</p> <p>According to NHS England data, the site does not have a surgery with capacity within 1km (Health)</p> |
| U73 | Shenley Wood Site D       | Shenley Wood    | <p>Housing development would see the loss of a high-value employment allocation. Residential development would also prejudice new school development, which is proposed on the site (Existing use)</p> <p>Development of the site would impede the delivery of a proposed new school (Impede infrastructure)</p>   |
| U07 | Woodlands off Breckland   | Linford Wood    | <p>Housing development would see the loss of a high-value employment allocation (Existing use)</p> <p>According to NHS England data, the site does not have a surgery with capacity within 1km (Health)</p>  |
| U11 | Galleon Wharf             | Old Wolverton   | <p>Access is likely to be a fundamental constraint to delivery (Access)</p> <p>Current schools' capacity prohibits allocation (Schools)</p> <p>According to NHS England data, the site does not have a surgery with capacity within 1km (Health)</p>   |
| U15 | Land to the rear of Hayes | Stony Stratford | <p>The owner has indicated the site may not be available for development (Ownership)</p>   |
| U16 | Land off Calverton Road   | Stony Stratford | <p>There are notable species recorded on the site and an adjacent wildlife corridor (Bio/geological importance)</p> <p>Development would enclose the path that runs along its boundary and make the immediate area less open. The amenity value of the site in terms of its appearance would therefore potentially be harmed by development (Open space)</p>                                       |
| U29 | Shenley Dens Farm         | Oakhill -       | <p>The site would not form a logical extension to the settlement in terms of enclosure character</p>   |

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|     |                               |                             |  |
|-----|-------------------------------|-----------------------------|--|
|     |                               | Expansion                   | <p>(Logical extension)</p> <p>The site does not lie within an area of attractive landscape but development would breach a natural ridge that exists between the site and the western edge of the city (Landscape)</p> <p>According to NHS England data the site is not within 1km of a surgery with capacity (Health)</p>  |
| U27 | Land West of Bow Brickhill    | Caldecotte (Expansion)      | <p>Development would represent a noticeable intrusion into open countryside and present coalescence issues between Bow Brickhill and the urban area of Milton Keynes (Logical extension)</p> <p>According to NHS England data, the site does not have a surgery with capacity within 1km (Health)</p>  |
| U22 | Land West of Brickhill Street | Caldecotte (Expansion)      | <p>There is very little enclosure character in relation to the existing settlement; the site would represent a harmful intrusion into open countryside (Logical extension)</p> <p>There are no health facilities within 1km (Health)</p>   |
| U28 | Land at Little Linford Lane   | Redhouse Park (Expansion)   | <p>Access from Little Linford lane is unlikely to be suitable for any significant amount of new development (Access)</p> <p>The site runs parallel to the M1 motorway which will severely limit development along its eastern edge and is likely to adversely impact the marketability and suitability of the development (Neighbouring use)</p> <p>The site is long and thin in nature and would represent a notable extrusion into open countryside (Logical extension)</p> <p>Consideration of the site at previous enquiries has found that landscape impacts have been a major issue for the site (Landscape)</p> <p>According to NHS England data, the site does not have a surgery with capacity within 1km (Health).</p> |
| U54 | Land at Dropshort Farm        | Fenny Stratford (Expansion) | <p>The site does not represent a logical extension into countryside on its own merits (Logical extension)</p> <p>According to NHS England data, the site's nearest health facilities are already operating over</p>  |



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|     |   |                             |   |
|-----|---|-----------------------------|---|
|     |   |                             | capacity (Health)   |
| U60 | Land at corner of Lower End Road & Cranfield Road | Wavendon (SLA expansion)    | The site is not a logical extension to the settlement in terms of enclosure character (Logical extension)<br>The nearest health facilities are over 1km away (Health)   |
| U59 | Land South of Lower End Road (c)                  | Wavendon (SLA expansion)    | The site is not a logical extension to the settlement in terms of enclosure character (Logical extension)<br>The nearest health facilities are over 1km away (Health)   |
| U26 | Land South of Lower End Road (b)                  | Wavendon (SLA expansion)    | The site is not a logical extension to the settlement in terms of enclosure character (Logical extension)<br>The nearest health facilities are over 1km away (Health)   |
| U55 | Cross Roads Farm                                  | Fenny Stratford (Expansion) | The site does not represent a logical extension into countryside on its own merits (Logical extension)<br>The site does not have a health centre with capacity within 1km (Health)                              |
| U25 | Land South of Lower End Road (a)                  | Wavendon (SLA expansion)    | The site is not a logical extension to the settlement in terms of enclosure character (Logical extension)<br>The nearest health facilities are over 1km away (Health)   |
| U56 | Land East of A5                                   | Fenny Stratford (Expansion) | The site does not represent a logical extension into countryside on its own merits (Logical extension)<br>The site does not have any health facilities within 1km that have capacity (Health)                   |
| U57 | Land at Middle Weald                              | Middle Weald (Expansion)    | The site is not a logical extension in terms of enclosure character (Logical extension)<br>The western edge of the WEA follows a natural landscape ridge that development of this site would breach (Landscape) |

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|     |                                       |                                |  |
|-----|---------------------------------------|--------------------------------|--|
|     |                                       |                                | According to NHS England data, the site is not within 1km of a surgery with capacity (Health)  |
| U58 | Kestrel view Stables,<br>Middle Weald | Middle Weald<br>(Expansion)    | The site is not a logical extension in terms of enclosure character (Logical extension)<br><br>The western edge of the WEA follows a natural landscape ridge that development of this site would breach (Landscape)<br><br>According to NHS England data, the site is not within 1km of a surgery with capacity (Health) |
| U01 | Belvedere Farm                        | Bletchley/Fenny                | The site greenfield within the floodplain (more than 50%) – the site ruled out at stage 1  |
| U14 | Former gas works site                 | Stony Stratford                | The site would deliver fewer than 10 dwellings – the site ruled out at stage 1   |
| U23 | Land at Eaton Leys                    | Fenny Stratford<br>(Expansion) | The site is partially within floodplain and largely covered by Scheduled Ancient Monument – the site ruled out at stage 1.   |
| U24 | Land at Linford Lakes                 | Great Linford<br>(Expansion)   | The site is greenfield within the floodplain (more than 50%). Development of the site would have a significant negative effect on a site designated for biological or geological importance. The site ruled out at stage 1   |

**Evaluating the likely effects of the Plan and alternatives (Task B3)**

- 3.18. The Council's main tool in selecting its proposed allocations is a sifting and ranking process based on individual site assessments. It consists of 3 main stages that are considered collectively to determine a site's suitability. The site selection process began with a sifting exercise that distinguished sites that the Council did not find acceptable in sustainability terms, irrespective of their potential contribution to land supply. In the Emerging Preferred Options consultation, an intermediate category of sites was also identified that had sustainability issues that were either minor or could potentially be overcome.
- 3.19. In Stage 2 each site was given a Red (negative impact), Amber (slightly negative impact) or Green (positive impact) rating ('RAG' rating) depending on whether sustainability or delivery issues were or were not raised. In reaching its final choice of sites, the Council has refined its sifting approach to reflect unavoidable impact on health capacity. Sites were discounted from allocation if a 'red' rating has been identified against any criteria other than health.
- 3.20. As can be seen in table 7 (page 22), the only cumulative impact of the plan that has been identified as being significant is SA3 – Improving the availability and accessibility of key services and facilities. This reflects the fact that throughout the site assessment process and subsequent consultation, the issue of health capacity has consistently been flagged as a significant barrier to development on particular sites.
- 3.21. The Council's evidence on this is based on a patients-per-square-foot ratio provided by NHS England. This data shows that 7 out of 13 surgeries that are 'green rated' for capacity have no potential sites in their vicinity. There are only 9 sites near the 6 surgeries that do have capacity, of which only 5 are suitable once other assessment criteria are considered. Therefore health capacity is an insurmountable barrier to the cumulative sustainability of the plan, if the required level of development is to be provided.
- 3.22. The purpose of the plan is to directly address a deficit in land supply, therefore allocations will need to be made that do not fully resolve this health issue.
- 3.23. In making decisions about the allocation of sites, the conclusions drawn in Stage 2 were considered alongside the sustainability score of each site established at Stage 3. For individual sites, the findings of Stage 2 and Stage 3 should be read together to ascertain sustainability. It should be noted that this relationship has not been severed by the ranking and sifting process used for site selection; this is demonstrated by the fact that despite being categorised by Stage 2 results, there is a negative correlation in average Stage 3 scores between each category of site – 51 for likely options, 49 for possible, and 28 for those sites not considered suitable. Table 6 overleaf shows the sites proposed in the Sites Allocation Plan, and their impacts.
- 3.24. Appendix 2 shows how sites have been sifted into various categories depending on their assessment outcomes. At the top are sites with relatively few or minor issues in terms of Stage 2 assessments. Following this is a range of sites that have scored one red rating on any given criteria other than health, indicating issues that might make them unsuitable for allocation.
- 3.25. At the bottom are sites that have not passed Stage 1 assessment, have scored 2 or more red ratings, or have scored a red rating that is considered fundamentally unresolvable (e.g. an unwilling landowner). It is not expected that these sites will be appropriate for allocation unless these significant obstacles are overcome in the future.

- 3.26. There is no significant spatial clustering of proposed allocations (see map below). Therefore the cumulative negative impact of the draft plan is generally considered to be low. The cumulative impact is assessed in Table 7 on page 21 of this report. The only area of slightly negative impacts is on availability and accessibility of key services and facilities (mainly schools). The small-scale nature of the Plan's allocations means that contributions to new services and facilities will be limited. Positive impacts include provision of housing, efficient use of land and on economic growth.
- 3.27. The specific impact of each site is considered in detail in each of the individual site assessments (Appendix 3).

**Distribution of proposed site allocations across Milton Keynes**



**Table 6. Proposed allocated sites and their SA effects**

| Ref    | Name   | Physical constraints |           |          |            |                  |                   | Environmental constraints |                    |            |          | Deliverability constraints |           |           |         |        |                      |                 |                       |
|--------|--|----------------------|-----------|----------|------------|------------------|-------------------|---------------------------|--------------------|------------|----------|----------------------------|-----------|-----------|---------|--------|----------------------|-----------------|-----------------------|
|        |  | Access               | Utilities | Drainage | Site specs | Neighbouring use | Logical extension | Landscape                 | Bio/geo importance | Open space | Heritage | Existing use               | Ownership | Viability | Schools | Health | Infrastructure needs | Market capacity | Impede infrastructure |
| SAP 1  | Our Lady of Lourdes Church, Lloyds, Coffee Hall                        |                      |           |          |            |                  |                   |                           |                    |            |          |                            |           |           |         |        |                      |                 |                       |
| SAP 2  | Wellington Place car park, Bletchley                                   |                      |           |          |            |                  |                   |                           |                    |            |          |                            |           |           |         |        |                      |                 |                       |
| SAP 3  | Land off Singleton Drive, Grange Farm                                  |                      |           |          |            |                  |                   |                           |                    |            |          |                            |           |           |         |        |                      |                 |                       |
| SAP 4  | Land East of John Lewis car park, Central Milton Keynes                |                      |           |          |            |                  |                   |                           |                    |            |          |                            |           |           |         |        |                      |                 |                       |
| SAP 5  | Land North of Vernier Crescent, Medbourne                              |                      |           |          |            |                  |                   |                           |                    |            |          |                            |           |           |         |        |                      |                 |                       |
| SAP 6  | Gurnards Avenue, Fishermead  |                      |           |          |            |                  |                   |                           |                    |            |          |                            |           |           |         |        |                      |                 |                       |
| SAP 7  | Land to the rear of Morrison's supermarket, Barnsdale Drive, Westcroft |                      |           |          |            |                  |                   |                           |                    |            |          |                            |           |           |         |        |                      |                 |                       |
| SAP 8  | Land at Bergamot Gardens, Walnut Tree                                  |                      |           |          |            |                  |                   |                           |                    |            |          |                            |           |           |         |        |                      |                 |                       |
| SAP 9  | Independent School site, Daubeney Gate, Shenley Church End             |                      |           |          |            |                  |                   |                           |                    |            |          |                            |           |           |         |        |                      |                 |                       |
| SAP 10 | Land off Lilleshall Avenue, Monkston                                   |                      |           |          |            |                  |                   |                           |                    |            |          |                            |           |           |         |        |                      |                 |                       |
| SAP 11 | Builders merchants, Simpson Road, Fenny Stratford                      |                      |           |          |            |                  |                   |                           |                    |            |          |                            |           |           |         |        |                      |                 |                       |
| SAP 12 | Land off Hampstead Gate, Bradwell Common                               |                      |           |          |            |                  |                   |                           |                    |            |          |                            |           |           |         |        |                      |                 |                       |
| SAP 13 | Former MFI Unit, Watling Street, Bletchley                             |                      |           |          |            |                  |                   |                           |                    |            |          |                            |           |           |         |        |                      |                 |                       |
| SAP 14 | Land off Harrowden, Bradville  |                      |           |          |            |                  |                   |                           |                    |            |          |                            |           |           |         |        |                      |                 |                       |
| SAP 15 | Kents Hill Site D1, Timbold Drive                                      |                      |           |          |            |                  |                   |                           |                    |            |          |                            |           |           |         |        |                      |                 |                       |
| SAP 15 | Kents Hill Site C, Timbold Drive                                       |                      |           |          |            |                  |                   |                           |                    |            |          |                            |           |           |         |        |                      |                 |                       |



**Table 7. Cumulative impacts of the Site Allocations Plan**

| Ref | SA Objective  | Plan impact | Commentary   | Mitigated impact | Potential mitigation  |
|-----|---|-------------|--|------------------|---|
|     | <b>Social</b>   |             |  |                  |   |
| SA1 | Ensure that everyone has the opportunity to live in an affordable, sustainably constructed, decent home.  | +           | The plan will have a positive effect on this objective by increasing the supply of land for housing.   | ++               | Prescriptive policies for affordable housing or sustainable construction are used to enhance the standard of homes provided.  |
| SA2 | Reduce crime, poverty, social exclusion and inequalities in health, closing the gap between Milton Keynes' most deprived areas and the average. | 0           | The plan allocates sites across a range of areas but in general does not address Milton Keynes' most deprived areas, which are subject to a separate regeneration program.   | 0                | Outside plan's scope due to lack of site availability in deprived areas.  |
| SA3 | Improve availability and accessibility of key services and facilities   | -           | The small-scale nature of the plan's allocations means that contributions to new services and facilities will be limited. Accessibility to existing key services is a core consideration in the site assessment framework used to select sites. The availability of these services will potentially be compromised by a greater population in the local area though. | -                | Prescriptive policies used to mitigate any severe impact on schools and health services in particular. With regards to health, an insurmountable issue for the plan is the lack of land availability near facilities with capacity. |
|     | <b>Environmental</b>  |             |  |                  |   |
| SA4 | Make efficient use of land, increasing the use of brownfield sites and encouraging urban renaissance  | +           | Across the 21 proposed allocations, 6 are brownfield (29%). This compares with 7 brownfield sites that are available but have not been allocated, on grounds of access, size,  | ++               | Brownfield allocations will also be considered for the Council's brownfield register and permission in principle.   |

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|      |   |     |   |   |   |
|------|---|-----|---|---|---|
|      |   |     | or availability. Although not previously developed land, the remaining allocations are all purposefully located in the existing urban area or on the fringes, which should ensure efficient usage and encourage urban vitality. |   |   |
| SA5  | Continue to maintain and improve local air quality and limit noise, soil and light pollution                | 0   | The small scale and distributed nature of allocations means all forms of pollution will be limited with negligible cumulative impact.   | + | Prescriptive policies can be used to manage site-specific pollution issues. Where allocations are clustered, phasing and monitoring can be considered to limit the likelihood of cumulative impact. |
| SA6  | Encourage the use of more sustainable modes of travel   | 0/- | Generally speaking the allocations proposed are dispersed around the Borough and are not large enough to generate significant investment in sustainable travel.   | + | Prescriptive policies have been developed on a site-by-site basis to ensure links to redway network are delivered alongside other measures like bus stops and electric vehicle charging points.     |
| SA7  | Conserve and enhance the Borough's biodiversity and landscape character                                     | 0   | Site assessment process has sought to avoid adverse impacts on biodiversity and landscape. No identifiable cumulative impacts.  | 0 | No identifiable cumulative impacts – no mitigation required.  |
| SA8  | Conserve and enhance the Borough's heritage and cultural assets, and the character of the built environment | 0   | Site assessment process has sought to avoid adverse impacts heritage and cultural character. No identifiable cumulative impacts.  | 0 | No identifiable cumulative impacts – no mitigation required.  |
| SA9  | Maintain and improve the Borough's water quality and reduce the risk of flooding                            | +   | No proposed allocations are in flood risk areas. Development will incorporate SUDS that should see flood risk reduced in adjacent areas too.  | + | No identifiable cumulative impacts – no mitigation required.  |
| SA10 | Encourage the efficient use of energy, water and other  | 0   | No cumulative impact.   | 0 | No identifiable cumulative impacts – no mitigation required.  |



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|      |  |   |   |    |  |
|------|--|---|---|----|--|
|      | natural resources, throughout the life of the development  |   |   |    |  |
|      | <b>Economic</b>  |   |   |    |  |
| SA11 | Ensure good access to employment opportunities to allow all residents to benefit from economic growth  | + | <p>Cumulatively enough land has been allocated to ensure Milton Keynes’s labour force has ready access to housing in the local area, which in turn allows residents to benefit from economic growth.</p> <p>Some of the proposed allocations are presently designated for employment use. However, the site selection process has favoured sites with less value for employment uses.</p> | ++ |  |
| SA12 | Sustain economic growth and competitiveness across the Borough   | + | Cumulatively enough land has been allocated to ensure that short-term housing delivery matches  | ++ | By allocating for a level of development beyond what is necessary to ensure a 5-year housing land supply, the plan lessens the constraint housing availability has on economic growth. |
| SA13 | Create vibrant communities, and improve the vitality and viability of town, local and district centres | + | The proposed sites will make use of redundant and underused land, which should improve the vibrancy and vitality of communities. In terms of centres, around a third of the proposed allocations are located in or around these, demonstrating a positive cumulative effect.  | +  | Positive cumulative impact already achieved – no mitigation required.  |

**Considering ways of mitigating adverse effects and maximising beneficial effects (Task B4)**

- 3.28. Sites have been selected as broadly sustainable using the assessment process outlined above. There is still a need to maximise the sustainability of any given site through prescribed policies governing how development is delivered. This has been achieved by using the consultation responses received to the Emerging Preferred Options as well as testing the principle of development against the Sustainability Objectives as outlined in Table 4 overleaf.

**Table 4. Mitigating adverse effects and maximising beneficial effects of the Plan**

| Site Ref   | Site  | Most significant outstanding assessment issues | Summary of any other outstanding consultee issues  | Summary of conclusions and proposed mitigation  | Link between proposed mitigation and SA objectives |
|------------|---|--|--|---|--|
| SAP1 (U48) | Our Lady of Lourdes Church, Lloyds, Coffee Hall         | Existing use; heritage; biodiversity           | Comments relating to the loss of the unique architecture on the site.                                | <p>The site is no longer used for a community facility and a recent application was supported by evidence it was not needed for this purpose.</p> <p>Policies have been used that encourage links to the adjacent wildlife corridor and a design that reflects the unique architecture of the current building.</p> | SA7, SA8   |
| SAP2 (U31) | Wellington Place car park, Bletchley                    | Neighbouring use; existing use; infrastructure | None   | <p>The site is a small scale employment site that has no strategic value.</p> <p>The adjacent railway line and access to it are both reflected in policies requiring a layout and design that respect these.</p>  | SA5, SA11, SA12                                    |
| SAP3 (U6)  | Land off Singleton Drive, Grange Farm                   | None   | None   | <p>The site is largely unconstrained, limited mitigation is needed.</p> <p>Policies to retain access through the site and improve access to nearby local centre and school included for clarity.</p>  | SA3, SA6   |
| SAP4 (U46) | Land East of John Lewis car park, Central Milton Keynes | Access, neighbouring use, heritage             | Comments relating to the CMK Neighbourhood Plan and protecting the site as 'classic infrastructure'. | The site would be on the edge of CMK in a prominent location. Respecting the setting of the nearby shopping centre and Campbell Park are therefore included as policy requirements as is further detailed work regarding access,  | SA7, SA8, SA13                                     |

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| Site Ref   | Site   | Most significant outstanding assessment issues | Summary of any other outstanding consultee issues  | Summary of conclusions and proposed mitigation   | Link between proposed mitigation and SA objectives |
|------------|--|--|--|--|--|
|            |  |  |  | particularly in terms of the future multi-storey car park.   |  |
| SAP5 (U8)  | Land North of Vernier Crescent, Medbourne                              | None   | Comments relating to the loss of opportunity for future community facility (specifically a pub). | The site is largely unconstrained, limited mitigation needed.  | SA3  |
| SAP6 (U5)  | Gurnards Avenue, Fishermead  | None   | None   | The site is largely unconstrained, there is limited mitigation needed. The main issue is the loss of designated employment land but the site's value for this purpose is not considered significant.   | SA11, SA12   |
| SAP7 (U18) | Land to the rear of Morrison's supermarket, Barnsdale Drive, Westcroft | Neighbouring use                               | None   | The site will potentially suffer from noise issues due to the adjacent supermarket. Policy requirements introduced to mitigate this including full assessment and sensitive design.  | SA5  |
| SAP8 (U80) | Land at Bergamot Gardens, Walnut Tree                                  | None   | None   | The site is relatively unconstrained and benefits from a supporting policy in a draft neighbourhood plan that specifies aspects of delivery.   | SA3, SA4   |
| SAP9 (U10) | Independent School site, Daubeney Gate, Shenley Church End             | Heritage, existing use                         | Access, infrastructure, loss of amenity and privacy  | The site is presently allocated for educational purposes although is unlikely to come forward as an independent school as planned. Reallocation as residential development is not constrained by any other significantly different factors. Concerns have been expressed regarding access and the loss | SA7, SA8   |

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| Site Ref    | Site  | Most significant outstanding assessment issues | Summary of any other outstanding consultee issues | Summary of conclusions and proposed mitigation  | Link between proposed mitigation and SA objectives |
|-------------|---|--|---|---|--|
|             |   |  |   | of amenity/privacy. Policy requirements specifying particular solutions to these issues are therefore included.   |  |
| SAP10 (U10) | Land off Lilleshall Avenue, Monkston              | None   | Drainage, access, parking                         | The site is relatively unconstrained although there is anecdotal evidence of surface water flooding. The site has a development brief that provides indicative principles of development.   | SA2, SA3, SA4, SA9                                 |
| SAP11 (U39) | Builders merchants, Simpson Road, Fenny Stratford | Access, viability, existing use                | None – support                                    | The site consists of one builders' merchants that is already allocated for residential development (since 2005) and another that is opposite yet is currently still allocated for commercial purposes. Access issues for each depend on the future of the adjacent level crossing during the East-West Rail upgrades but it is likely that residential development would result in a net gain in highways terms.                        | SA6, SA8   |
| SAP12 (U3)  | Land off Hampstead Gate, Bradwell Common          | None.  | Parking, loss of amenity                          | The site is a reserve site that has residential development specified as one potential use. It is unconstrained other than a slightly sloping topography. Consultation responses indicate a strong resistance to the loss of the site for amenity purposes although it is not formally allocated for that use. Formal open space is just over 400m away so prescriptive policies for the development of this site have been included to | SA2, SA4   |

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| Site Ref       | Site   | Most significant outstanding assessment issues   | Summary of any other outstanding consultee issues | Summary of conclusions and proposed mitigation   | Link between proposed mitigation and SA objectives |
|----------------|--|--|---|--|--|
|                |  |  |   | enhance the links to that area and also to incorporate formal play equipment into any potential development. On-site parking is also required to mitigate any additional adverse impact in the vicinity.   |  |
| SAP13 (U2)     | Former MFI Unit, Watling Street, Bletchley             | Neighbouring use, noise, existing use, viability | None  | The site is currently used for retail although is outside the primary shopping area. Redevelopment would require demolition and there could be contamination affecting viability.  | SA4, SA5   |
| SAP14 (U40)    | Land off Harrowden, Bradville                          | None   | None  | Site is part of wider regeneration area but is relatively unconstrained and suitable for development.  | SA2, SA7   |
| SAP15 (U65-67) | Kents Hill Site A, C, D1, Timbold Drive                | Existing use                                     | Infrastructure, existing use.                     | The sites form part of a wider area that is briefed for education and residential use.   | SA6, SA7, SA12                                     |
| SAP16 (U12)    | Manifold Lane, Shenley Brook End                       | None   | None  | The site is unconstrained and has a development brief.   | SA3, SA5, SA12                                     |
| SAP17 (U19)    | East of Snellshall Street, Cranborne Avenue, Westcroft | None   | None  | The site is unconstrained and has a development brief.   | SA3, SA4, SA12                                     |
| SAP18 (U17)    | Land at Towergate, Groveway, Wavendon Gate             | Existing use, access                             | Access, relation to surrounding sites.            | The site is relatively unconstrained, it is allocated as employment although is of relatively low value. Specific access requirements would be necessary but are achievable. Consultation issues concern the site's relationship with adjoining parcels, which are either consented or allocated already. This is addressed in a neighbourhood plan, | SA7, SA13  |

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| Site Ref    | Site  | Most significant outstanding assessment issues | Summary of any other outstanding consultee issues | Summary of conclusions and proposed mitigation   | Link between proposed mitigation and SA objectives |
|-------------|---|--|---|--|--|
|             |   |  |   | therefore the policy wording for the proposed allocation defers to that plan.  |  |
| SAP19 (U81) | Land at Walton Manor, Groveway/Simpson Road, Walton Manor | Existing use                                   | Existing use, access, play provision, density.    | The site is relatively unconstrained, it is allocated as employment land although is of relatively low value. It has a development brief that sets out principles of development, most of which address the same concerns that were raised through consultation.                         | SA3, SA12  |
| SAP20 (U4)  | Land at Broughton Atterbury, Oakworth Avenue, Broughton   | Drainage, existing use                         | None  | The site is unconstrained, allocated for employment and has an adopted development brief. There was relatively little feedback during consultation beyond the need to avoid the small portions of the site that suffer from drainage issues.   | SA3, SA9, SA12                                     |
| SAP21 (U9)  | Land off Ladbroke Grove, Monkston Park                    | Biodiversity                                   | Access  | The site has limited constraints from biodiversity with a river wildlife corridor running along its western edge. Consultation concerns also raised the location of the access and its proximity to the grid road. Specialist highways advice does not indicate this is an issue though. | SA3, SA7   |

**Proposing measures to monitor the significant effects of implementing the Plan (Task B 5)**

- 3.29. The Site Allocations Plan consists of policies for only residential development. Separate monitoring criteria and indicators are therefore not required for the plan.
- 3.30. The delivery of each individual allocation will be monitored through the Council's existing procedure for monitoring housing land supply. This consists of maintaining a housing trajectory that is updated quarterly to reflect latest completion rates and any other 'intelligence' that has been gathered by the Council's Joint Housing Monitoring Team.
- 3.31. Each allocation in the Site Allocations Plan should, in theory, be deliverable within five years. However, the delivery of each site will be contingent on several factors including the timing and outcome of the plan's Public Examination as well how the development industry acts upon the new 'permission in principle' process.
- 3.32. Also, the Council's Monitoring Reports will cover significant social, economic and environmental effects associated with the Plan. This will allow the identification of any unforeseen adverse effects and enable appropriate remedial action to be taken.

**4. Next Steps**

- 4.1. The Site Allocations Plan Proposed Submission document and the SA Report will be consulted on (Stage D of the SA process; please see Figure 1 on page 6). Milton Keynes Council will then consider the responses to the Proposed Submission consultation and then submit the Plan to the Secretary of State. Submission of the Site Allocations Plan to the Secretary of State will be followed by an Examination in Public before the Plan can be adopted. Any significant changes made during these stages will need to be subject to further Sustainability Appraisal and public consultation prior to adoption.