

Sustainability Appraisal (SA) of Plan:MK

SA Report

November 2017

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INTRODUCTION

1 BACKGROUND

- 1.1.1 AECOM is commissioned to lead on Sustainability Appraisal (SA) in support of the emerging Plan:MK. Once adopted, Plan:MK will allocate land for development, present policies (borough-wide and site-specific) to guide future planning applications and ultimately provide a planning framework for the district up to 2031.
- 1.1.2 SA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising the positives. SA of Local Plans is a legal requirement.¹

2 SA EXPLAINED

- 2.1.1 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which transposed into national law EU Directive 2001/42/EC on Strategic Environmental Assessment (SEA).²
- 2.1.2 In-line with the Regulations, a report (known as **the SA Report**) must be published for consultation alongside the draft plan that essentially 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'.³ The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 2.1.3 More specifically, the SA Report must answer the following **three questions**:
1. What has plan-making / SA involved **up to this point**?
 - Including in relation to 'reasonable alternatives'.
 2. What are the SA findings **at this stage**?
 - i.e. in relation to the draft plan.
 3. What happens **next**?

2.1 This SA Report⁴

- 2.1.1 This report is the Plan:MK SA Report. It is published alongside the final draft – 'proposed submission' – version of Plan MK, under Regulation 19 of the Local Planning Regulations.
- 2.1.2 Questions 1 - 3 are answered in turn, in order to provide the required information. Before answering Question 1, two initial questions are answered in order to further set the scene:
- i) What is the plan trying to achieve?
 - ii) What is the scope of the SA?

¹ Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (2012). The Town and Country Planning (Local Planning) (England) Regulations 2012 require that an SA Report is published for consultation alongside the 'Proposed Submission' plan document.

² *Procedurally* SA and SEA are one and the same, on the basis that there is no legislation or guidance to suggest that SA process should differ from the prescribed SEA process. SA and SEA differ only in terms of substantive focus. SA has an equal focus on all three 'pillars' of sustainable development (environment, social and economic), whilst SEA involves a degree of focus on the environmental pillar. SA can therefore be said to 'incorporate' SEA.

³ Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004.

⁴ See Appendix I for further explanation of the regulatory basis for answering certain questions within the SA Report, and a 'checklist' explaining more precisely the regulatory basis for presenting certain information.

3 WHAT IS THE PLAN SEEKING TO ACHIEVE?

3.1.1 As discussed above, once adopted, Plan MK will allocate land for development, present policies (district-wide and site-specific) to guide future planning applications and ultimately provide a planning framework for the district up to 2031. **Figure 3.1** shows the plan area, whilst **Figures 3.2 and 3.3** show key features of the main MK urban area.

3.2 Plan MK objectives

3.2.1 The plan objectives are as follows -

- Reflect the recommendations of the **MK Futures 2050** Commission Report, the land use planning implications of the Strategy for 2050 and its Six Big Projects:
 - Making Milton Keynes the hub of the Cambridge-Milton Keynes-Oxford growth corridor.
 - Enhancing lifelong learning opportunities through the establishment of a new university for Milton Keynes.
 - Learning 2050 – providing world class education.
 - Smart, Shared, Sustainable Mobility for all.
 - Renaissance:CMK creating an even stronger city centre fit for the 21st century.
 - Milton Keynes: The Creative and Cultured City.
- Deliver land for a minimum of **26,500 new homes** within the Borough between 2016 and 2031, principally within and adjacent to the city.
- Reflect the National Infrastructure Commission Interim Report (November 2016) and support development along the **Cambridge-Milton Keynes-Oxford growth corridor** reflecting the Council's preferred route (2).
- Work jointly with neighbouring authorities and other key organisations on the planning of any development located on the **edge of Milton Keynes** (outside the Borough boundary) so that these areas are integrated with the city and contribute to its role and character.
- Allocate and manage the development of **employment land** and pursue a vigorous economic development strategy so that the business sector and local economy are supported, existing firms can expand, new firms are attracted, the level of working skills among the local population is enhanced and the area's resident population can find employment locally.
- Improve the local opportunities for learning and increase the local level of **knowledge and skills** through the establishment of a new university for Milton Keynes, and support the development of MK College, the University Campus MK and MK:U, MK University Hospital and the creation of world class schools.
- Whilst recognizing the cultural attractions of the whole Borough, to promote the development of **Central Milton Keynes** as the vibrant cultural centre of the region by making it the main location within the city for retail, leisure, cultural and larger office developments.
- Support the continued **regeneration** of Wolverton and Bletchley as town centres within the main urban area (ideally with specialisations or Unique Selling Points (USPs))
- Seek the protection of existing key services and facilities in sustainable **rural settlements** and to encourage the development of further provision, including shops, world class schools, community and health services.
- Aim to reduce health **inequalities**, deprivation and improve housing quality and access to services for all.

- Facilitate the delivery of **housing** that meets the needs of all sections of the community through:
 - Providing sufficient developable land for new housing
 - Construction of viable levels of diverse housing including affordable, supported and specialist housing
 - Providing housing that supports the growth of the knowledge economy and a vibrant cultural offer
 - Taking account of the need for houses in multiple occupation
- Manage increased **travel** demands through:
 - Smart, shared, sustainable mobility
 - Promoting improvements to public transport and supporting the development of the East – West rail link between Oxford and Cambridge, including the Aylesbury spur
 - Encouraging an increased number of people to walk and cycle by developing an expanded and improved Redway network
 - Extending the grid road pattern into any major new development areas
 - Utilising demand management measures to reduce the growth of road congestion, whilst upgrading key traffic routes such as the A421, A422 and the A509
- Mitigate the Borough's impact on **climate change** and reduce carbon dioxide emissions through:
 - Locating development away from areas of flood risk and significant biodiversity value
 - Promoting community energy networks and strategic renewable energy developments
 - Reducing waste generation and increasing the amount of recycling
 - Sustainable transport initiatives
- Embody **Place Making** as a design objective for new development and require that the layout and design of new development creates safe, healthy, sustainable built environments with easy access to open space, public transport and everyday facilities, delivering a high quality of urban design, architecture and public realm and creates places with identity.
- Protect, maintain and enhance the important linear parks, sustainable urban drainage systems, **character and assets of the New City** and the towns and villages throughout the Borough, and to protect and maintain the open countryside in the Borough
- Encourage **healthy lifestyles** with the provision of recreation facilities and biodiversity by enhancing the linear park network and connecting it into new developments while conserving and enhancing key landscapes and important habitats.
- Work with **public service and infrastructure** providers (principally via the Local Investment Plan) to ensure that the social and economic growth planned in the Borough and neighbouring local authorities is facilitated by the timely provision of appropriate new and improved facilities such as public transport, schools, community halls, sport and recreation facilities, transport interchanges, health services (including MK Hospital), emergency services, highways and rail improvements, and a residual waste treatment plant.

3.3 What is the Local Plan not seeking to achieve?

- 3.3.1 It is important to emphasise that the plan will be strategic in nature. Even the allocation of sites / establishment of site-specific policy through this plan should also be considered a strategic undertaking, i.e. a process that omits consideration of some detailed issues, in the knowledge that these will be clarified and addressed at the planning application stage. The strategic nature of the plan is reflected in the scope of the SA.

Figure 3.1: The Milton Keynes Council area

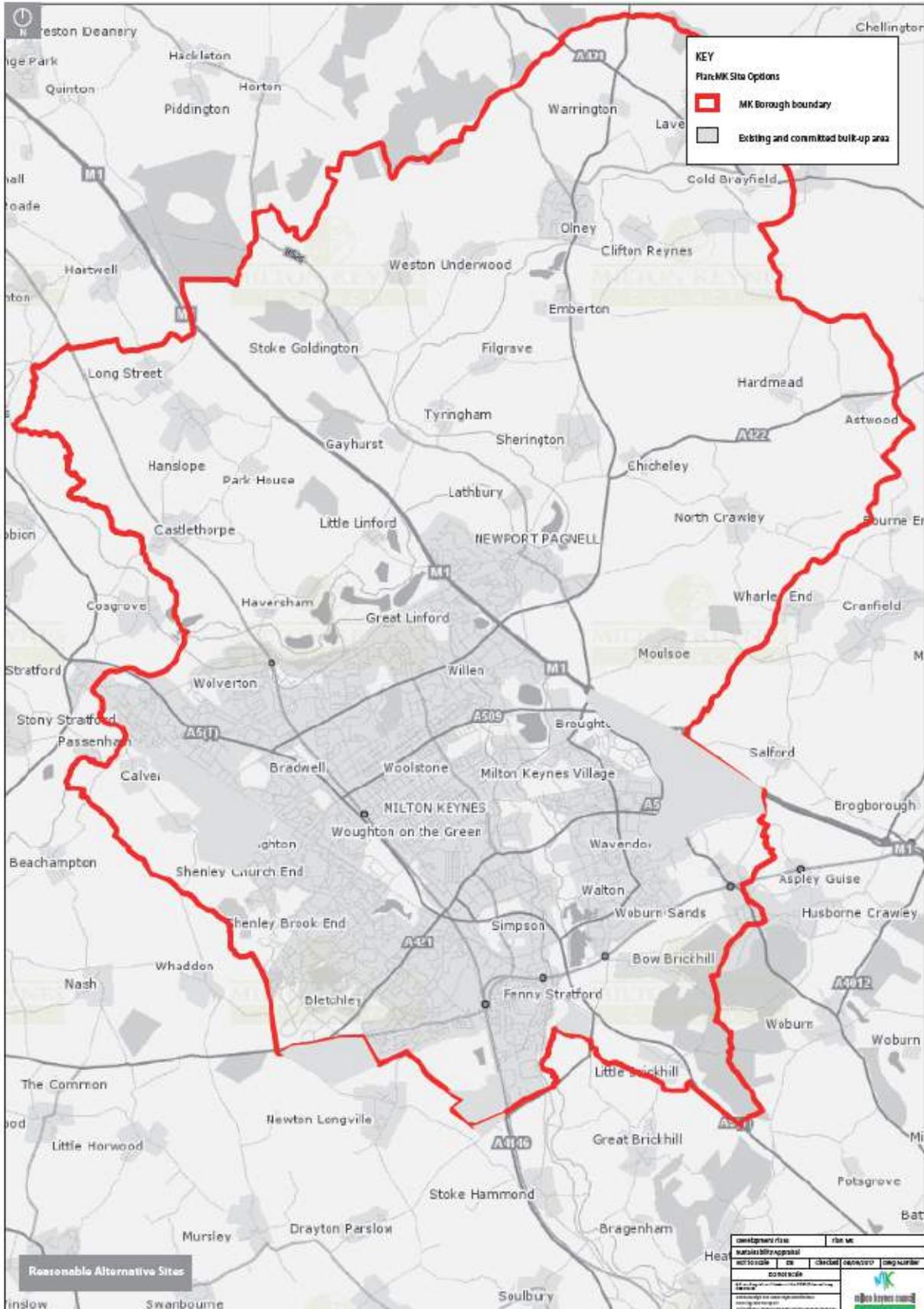


Figure 3.2: The MK urban area, showing CMK, residential areas and permitted scheme (in grey)

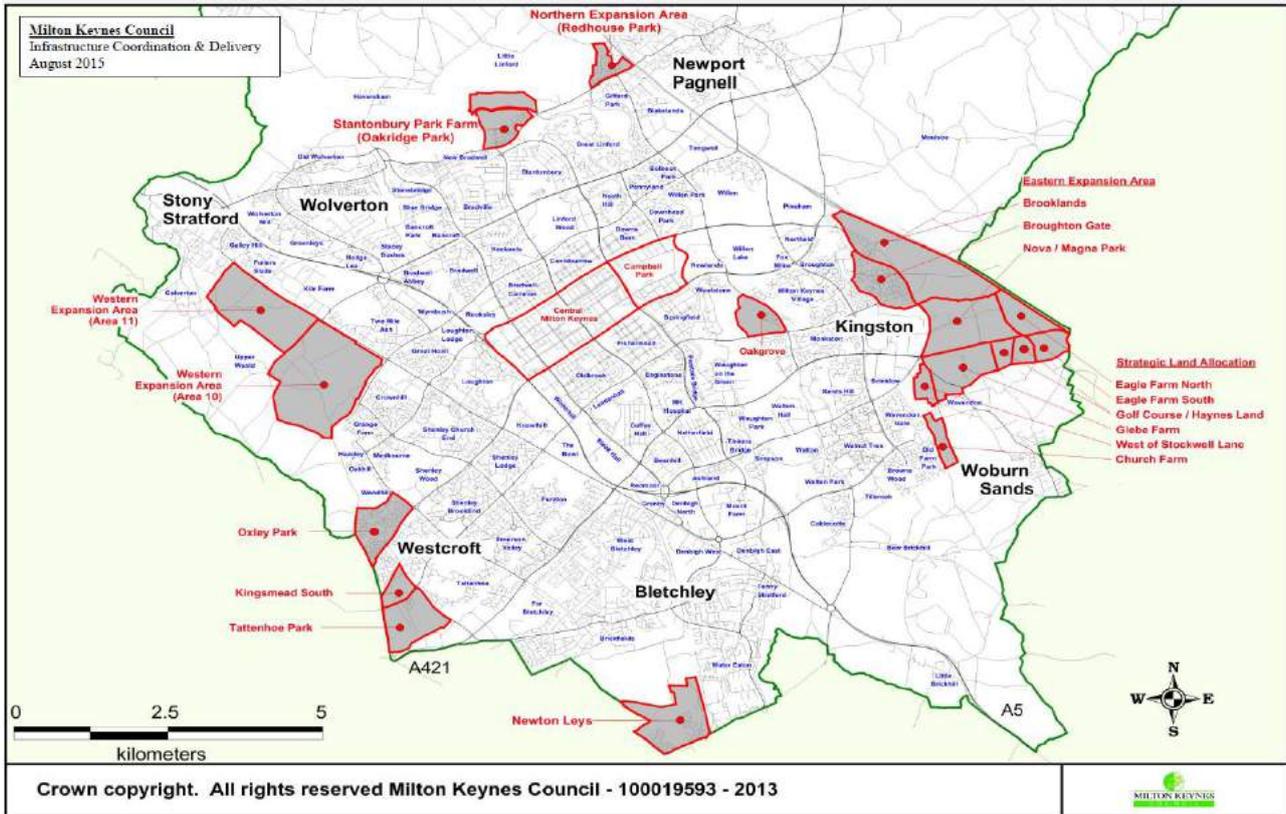
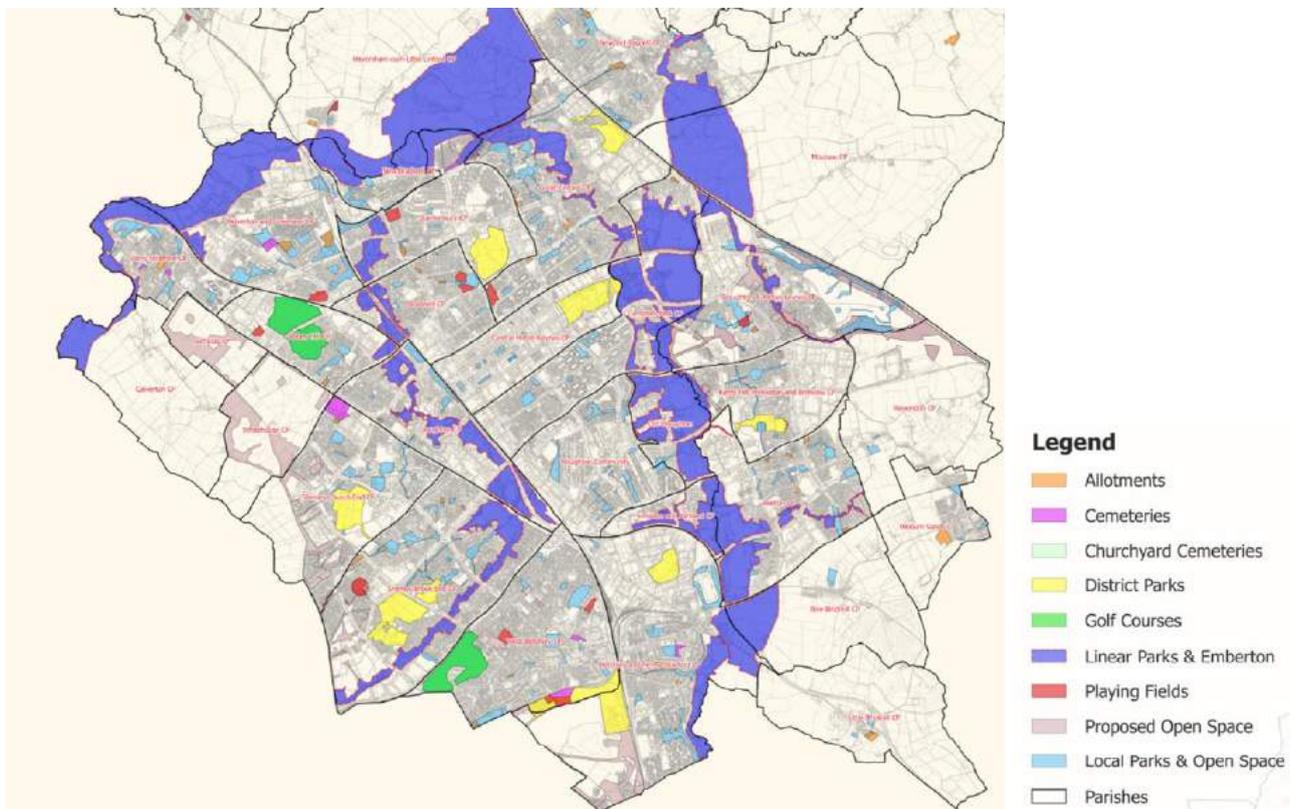


Figure 3.3: The MK urban area, showing a selection of key community / green infrastructure



4 WHAT IS THE SCOPE OF THE SA?

4.1 Introduction

4.1.1 The aim here is to introduce the reader to the scope of the SA, i.e. the sustainability issues / objectives that should be a focus of (and provide a broad methodological framework for) SA.

4.1.2 Further information on the scope of the SA – i.e. a review of sustainability issues/objectives as highlighted through a review of the sustainability ‘context’ and ‘baseline’ - is presented in **Appendix II**.

Consultation on the scope

4.1.3 The Regulations require that “When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e. the SA scope], the responsible authority shall consult the consultation bodies”. In England, the consultation bodies are the Environment Agency, Historic England and Natural England.⁵ As such, these authorities were consulted on the SA scope in October 2014. Since that time, the SA scope has evolved as new evidence has emerged - however, the scope remains fundamentally the same as that agreed through the dedicated scoping consultation.

4.2 Key issues / objectives

4.2.1 Table 4.1 presents the 12 sustainability objectives established through scoping work, and presents each alongside a short list of more specific issues. Taken together, the sustainability objectives and issues presented in Table 4.1 provide a methodological ‘framework’ for SA. N.B. **bold** text is used to highlight the key words within each objective, which are then used as shorthand later in this report.

⁵ In-line with Article 6(3) of the SEA Directive, these consultation bodies were selected because ‘by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes.’

Table 4.1: The SA framework

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

N.B. The SA framework was amended slightly, in summer 2017. Specifically, one objective relating to 'landscape' was added, and three objectives were rationalised into one. Specifically, objectives relating to 'land', 'soils' and 'natural resources' were rationalised into a single objective under the heading 'natural resources'. This was deemed appropriate, given the scope of Plan MK, and a desire to avoid repetition.

PART 1: WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT?

5 INTRODUCTION (TO PART 1)

5.1.1 Preparation of Plan MK began in 2013, with three consultations having been held since, under Regulation 18 of the Local Planning Regulations, prior to this current consultation under Regulation 19. SA work has been undertaken alongside plan-making - see **Figure 5.1**.

Figure 5.1: Key steps in the plan-making / SA process



5.1.2 The aim here, within Part 1, is not to recount in detail the entire ‘story’ of plan-making to date, but rather to explain how work was undertaken to develop and then appraise **reasonable alternatives** prior to finalising the Proposed Submission Plan.⁶

5.1.3 More specifically still, this part of the report presents information regarding the consideration of reasonable alternative approaches to housing growth, or ‘**spatial strategy alternatives**’. It is clear that allocating land for housing is at the heart of the plan objectives (see Chapter 3).⁷

What about other plan issues?

5.1.4 Whilst the plan will set policy to address a range of other thematic issues through district-wide development management policy, these policy areas were not a focus of alternatives appraisal, and hence are not discussed further here, within Part 1 (but are a focus of Part 2).

What about site options?

5.1.5 Site options appraisal was undertaken as an interim step in order to inform development of reasonable spatial strategy alternatives, i.e. alternative combinations of site options.⁸ Site options are thus discussed in Chapter 6 “Establishing the reasonable alternatives”.

What about SA work from early 2017?

5.1.6 An Interim SA Report was published alongside the Draft Plan MK document in March 2017, presenting an appraisal of–

⁶ There is a requirement for the SA Report to present an appraisal of ‘reasonable alternatives’ and ‘an outline of the reasons for selecting the alternatives dealt with’. The aim is to inform the consultation, and subsequent plan finalisation.

⁷ Presenting information on reasonable alternatives, within the SA Report, is a regulatory requirement. Specifically, the Regulations require that, when determining what should be a focus of alternatives appraisal, account is taken of ‘the plan objectives’. Recent case-law (most notably Friends of the Earth Vs. Welsh Ministers, 2015) has established that planning authorities may apply discretion and planning judgement when determining what should reasonably be the focus of alternatives appraisal.

⁸ Options are not ‘alternatives’ where there is no mutually exclusive choice to be made between them.

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

5.1.7 Appraisal findings from the March 2017 report are not repeated here, but rather are discussed as an input to the establishment of reasonable alternatives. The report remains available on the Council's website; however, it should be considered a historical document, prepared at a point in time, i.e. to inform the March 2017 consultation.⁹

Structure of this part of the report

5.1.8 This part of the report is structured as follows:

- Chapter 6** - explains the **process of establishing the reasonable alternatives**, undertaken by the Council and AECOM working in collaboration
- Chapter 7** - presents the outcomes of AECOM's **appraisal of the reasonable alternatives**
- Chapter 8** - explains the Council's **reasons for supporting the preferred option**, in light of the appraisal of reasonable alternatives

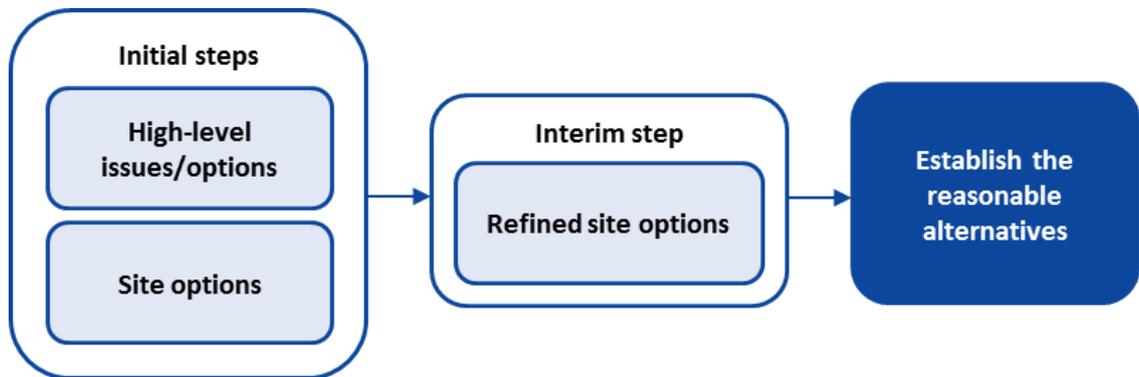
⁹ The March 2017 Interim SA Report is available at: <https://www.milton-keynes.gov.uk/planning-and-building/planning-policy/plan-mk>

6 ESTABLISHING THE REASONABLE ALTERNATIVES

6.1 Introduction

- 6.1.1 The aim here is to discuss the key steps taken in summer 2017 that led to the development of reasonable spatial strategy alternatives for appraisal and consultation.
- 6.1.2 Ultimately, the aim of this chapter is to present ‘an outline of the reasons for selecting the alternatives dealt with’, in accordance with the Regulations.¹⁰
- 6.1.3 Specifically, this chapter explains how reasonable alternatives were established subsequent to certain initial steps - see **Figure 6.1**.

Figure 6.1: Establishing reasonable spatial strategy alternatives



Structure of this chapter

- 6.2 - Discusses high-level issues / options
- 6.3 - Discusses site options
- 6.4 - Discusses refined site options
- 6.5 - Explains how understanding was drawn upon to establish the reasonable alternatives.

¹⁰ Schedule II of the Environmental Assessment of Plans and Programmes ('SEA') Regulations 2004

6.2 High-level issues/options

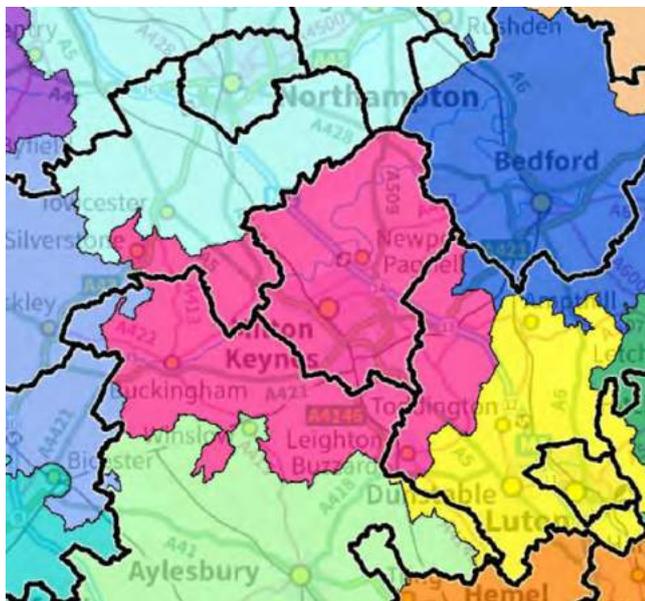
Introduction

- 6.2.1 This section gives consideration to high-level issues and options of relevance to the development of spatial strategy alternatives.

Housing quanta

- 6.2.2 A starting point is the National Planning Policy Framework (NPPF) requirement to provide for *“the full, objectively-assessed needs for market and affordable housing in the housing market area, as far as is consistent with [sustainable development]”* (para 47).
- 6.2.3 Definition of the housing market area (HMA) is itself not clear-cut, but it has been established that Milton Keynes is its own ‘best fit’ HMA.¹¹ Functionally, there is a recognition that the HMAs locally do not align with local authority boundaries – see **Figure 6.2**.

Figure 6.2: Functional Housing Market Areas



- 6.2.4 The Milton Keynes Strategic Housing Market Assessment (SHMA, 2017) established an objectively assessed housing need (OAHN) figure for the HMA (i.e. Milton Keynes Borough) of 26,500 dwellings over the 15-year period 2016-31, equivalent to an average of 1,767 dwellings per year. **Box 6.1** provides a brief overview of the SHMA process.
- 6.2.5 MK Council is committed to providing for the OAHN figure of **26,500** homes through Plan MK (1,767 per annum), recognising that MK is relatively unconstrained, in the national context.¹² Indeed, providing for OAHN is an established plan objective. Whilst there are feasibly arguments for considering lower growth options, such arguments are not persuasive, in the context of the NPPF and an up-to-date SHMA.¹³

¹¹ A report examining HMAs (and Functional Economic Areas, FEMAs) within Buckinghamshire is available at: <https://www.aylesburyvaledc.gov.uk/supporting-evidence>

¹² Paragraph 14 of the NPPF states that: *“Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework...”* A footnote then lists a series of example ‘policies’ that might act to constrain development, and lead to a conclusion that objectively assessed needs cannot be provided for.

¹³ There is an argument to suggest that housing growth outside of MK Borough, but within the MK functional HMA, could have the effect of reducing the MK Borough OAHN figure, noting that: a 1,885 home scheme has planning permission at Salden Chase; the 2016 Draft

6.2.6 There are arguments for Plan MK providing for **higher growth**. In particular -

- There are arguments to suggest that the ‘employment uplift’ applied by the SHMA (i.e. the uplift to ensure a balance between jobs and workers) could potentially be higher, resulting in a higher OAHN. This is in recognition of A) the importance of minimising unsustainable in-commuting; and B) the possibility of employment growth projections not fully reflecting the possibility of transformative (i.e. off-trend) employment growth. In relation to (B) -
 - the ‘MK2050’ Commission is currently examining options for growth through to 2050. As stated by the Commission in their 2016 report: “...we strongly believe that it is in the city’s best interest to promote a higher rate of growth through to 2050 at *“the continued expansion rate”* somewhere between 1,750 and 2,000 homes per annum. In due course, if successful, it might be sensible to try to move to higher rates.”^[1]
 - the Oxford to Cambridge Corridor is likely to be a national growth focus over forthcoming years. As stated by the National Infrastructure Commission (NIC, 2016): “... Britain must build on its strengths. The corridor connecting Cambridge, Milton Keynes and Oxford could be the **UK’s Silicon Valley**... But its future success is not guaranteed. The Commission’s central finding is that a lack of sufficient and suitable housing presents a fundamental risk to the success of the area.”^[2] [emphasis added]
- There is a need to consider the possibility of providing for ‘**unmet needs**’ arising from other HMAs, recognising paragraph 182 of the NPPF, which requires that Local Plans provide for “unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.” MK has not been formally asked by neighbouring authorities to accept any unmet needs; however, that does necessarily mean that the possibility of providing for some unmet needs should be ignored, when considering Plan MK spatial strategy alternatives. As can be seen from **Table 6.1**, work is ongoing on most nearby plans, and Duty to Cooperate discussions are ongoing.
- There could be a need to provide for a ‘above OAHN’ in order to ensure that the need for **affordable housing** is met. The SHMA identifies a need for 8,200 affordable homes, not taking account of any losses from the current stock (such as demolition or clearance, or sales through Right to Buy). Were Plan MK to provide for the 26,500 home OAHN figure, then 31% of homes delivered would need to be affordable; however, there are concerns regarding the ability to achieve above 30%, given viability issues. Of the 1,246 completions in the 2016/2017 monitoring year, only 20.1% were affordable; and the 16,734 permissions are set to deliver only 27.7%. The implication is that there could be a need to provide for ‘above OAHN’ in order to meet the 8,200 affordable homes target. Much depends on the findings of detailed viability work to examine the financial burdens placed on house-builders, including the need to provide for other types of housing (Starter Homes, Build to Rent, Self-build) that impact the ability to provide for affordable housing.¹⁴

6.2.7 The matter of lower and higher growth options is returned to below (see Section 6.4).

Vale of Aylesbury Local Plan proposed a 2,000 home allocation at Whaddon and also allocations for 500+ homes at Buckingham; and that the 2017 Draft Central Bedfordshire Local Plan proposed (as an option) significant growth close to the eastern edge of MK.

^[1] See <http://www.mkfutures2050.com/>

^[2] NIC (2016). See www.nic.org.uk/wp-content/uploads/Cambridge-Milton-Keynes-Oxford-interim-report.pdf

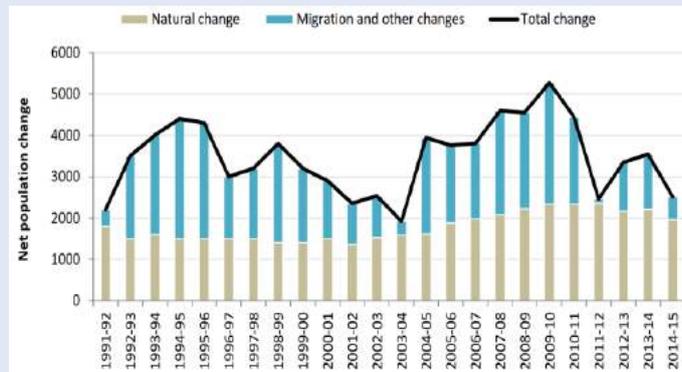
¹⁴ The NPPF defines affordable housing as: “Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.”

Box 6.1: The SHMA methodology

The SHMA goes through a series of steps, before arriving at the final OAHN figure for the Borough.

The starting point is the latest household projections published by the Department for Communities and Local Government (CLG). These projections suggest that household numbers across Milton Keynes will increase by **21,992** over the 15-year period 2016-31.

However, the CLG household projections are based on short-term migration trends, which the SHMA consultants (ORS) believe are not appropriate for long-term planning as they risk rolling-forward rates that are unduly high or unduly low. As such, ORS select an alternative household projection based on long-term (ten year; based on information for the period 2005-15) migration trends, which shows household numbers across the study area to increase by 23,125 over the 15-year Plan period 2016-31. Providing for an increase of 23,125 households yields a housing need of **23,939** homes over the Plan period.



Components of population change within MK Borough

Next there is a need to adjust for suppressed household formation rates, e.g. the tendency for young people to delay forming a new household. The conclusion is that there is a need for a modest uplift, bringing the final 'demographic' housing need figure to **24,744** homes, or 1,650 homes per annum.

The SHMA then goes through the following final steps -

A) Consider the need for an uplift in order to ensure a balance between jobs and workers, recognising that employment growth forecasts show an increase in jobs well in excess of the predicted increase in workers, and there is a need to avoid unsustainable in-commuting. ORS conclude that there is a need for an uplift.

B) Consider the need for an uplift in order to respond to market signals, i.e.

- House Prices and rents - MK is more expensive than all of its comparator areas. In addition, whilst all have increased over the last 5 years, MK has increased most.
- Affordability - the ratio between lower quartile house prices and lower quartile earnings is higher than across England (8.2 cf. 7.0) and the current rate is also higher than its comparator areas, Northampton (7.4), Swindon (6.4) and Peterborough (6.3). Furthermore, affordability ratios have worsened since 2010, with the ratio in MK increasing from 7.2 to 8.2 representing a 5-year change of 14%. This is higher than the equivalent rate for England, where the ratio increased from 6.7 to 7.0, a change of 5%, but a lower rate of change than for Northampton which increased from 5.9 to 7.4, a change of 25%.
- Rate of development - increase in MK's dwelling stock over the last 10 years has been more than double that in England (18.0% cf. 8.3%). This rate is consistent with Swindon (17.9%), but higher than the rates of development in Peterborough (12.3%) and Northampton (9.7%).
- Overcrowding - 9.6% of households in MK are overcrowded based on an objective measure, which is higher than England (8.7%). The proportion of overcrowded households has increased over the last 10 years at a similar rate to England. A greater percentage of households are overcrowded in Milton Keynes compared to all of its comparator areas, however there has been a much greater increase in the proportions of both Northampton and Peterborough compared to Milton Keynes.

ORS conclude that there is a need for an uplift.

C) Consider an uplift to respond to any under provision since the housing projection base date (2015), i.e. provision of below 1,650 homes per annum. ORS conclude that there is a need for an uplift.

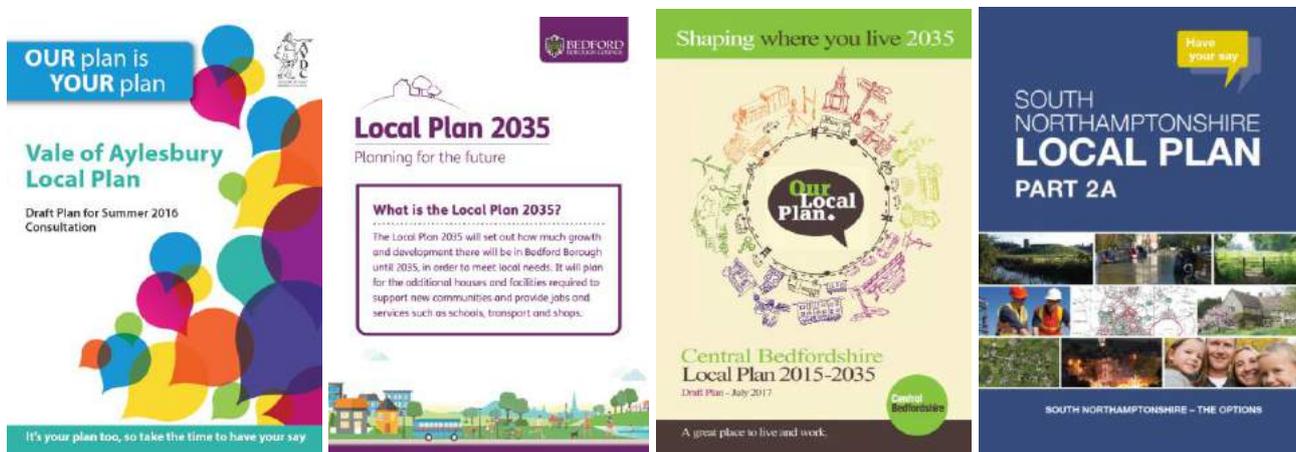
D) Apply whichever uplift figure is highest. The conclusion is that uplift A should be applied, which brings the final OAHN figure to 26,493 homes, or **26,500** homes once rounded.

Table 6.1: Progress on neighbouring Local Plans

Council	Next Stage*	Likelihood of unmet need arising?
Aylesbury Vale District	Reg 19 2017	Low. The Draft Local Plan (2016) proposed to provide for a quantum of growth above the district's OAHN, in order to provide for unmet needs arising from districts to the south. The district has good capacity, and so it is difficult to foresee a scenario whereby there would be a need to 'pass on' unmet need.
Bedford Borough	Reg 19 2018	Low. A Consultation Paper (2017) proposed to provide for the borough's OAHN. There is little reason to suggest that the borough will be asked to provide for unmet needs.
Central Bedfordshire District	Reg 19 2018	Low. The Draft Local Plan (2017) proposed to provide for a quantum of growth above the district's OAHN, in order to provide for Luton's unmet needs. The district has good capacity, and so it is difficult to foresee a scenario whereby there would be a need to 'pass on' unmet need.
South Northants	Reg 19 2018	Low. The district has good capacity, and the West Northamptonshire Joint Core Strategy Local Plan (Part 1) is in place to deal with unmet housing needs arising from Northampton.

* Regulations 18 and 19 of the Local Planning Regulations (2012) establish the regulatory framework for Local Plan-making prior to submission to the Secretary of State for independent examination by a Planning Inspector. Requirements under Regulation 18 are flexible, but it is typical to hold at least one formal consultation. Regulation 19 is the formal requirement to publish the 'Proposed Submission' plan.

Figure 6.3: Neighbouring Local Plans



MK city-specific growth opportunities

6.2.8 The Milton Keynes Futures 2050 Commission Report (2016) begins with the following powerful statement of ambition -

“Milton Keynes is the fastest growing city in the UK. This is driven by the people who feel the city is a great place to live and entrepreneurs and companies who decide it is a great place to invest. Milton Keynes is also a truly beautiful city... There is no other city in the world like it.

No city stands still – it either grows or declines. We urge that Milton Keynes commits to continuing to grow its population to 2050 and seizes the opportunity to create an even stronger, high-performing economy, a true regional economic centre. Equally, we urge that future plans respect the city’s distinctive heritage...”

6.2.9 The report goes on to present –

A) A vision for ‘inclusive growth’ to 2050 – see further discussion below.

B) Six Big Projects

- Hub of the Cambridge-Milton Keynes-Oxford Arc – “We believe that Government interest in investing in the arc is a once-in-a-generation opportunity for our city. Milton Keynes should take a strong view on a preferred location for the A421 Expressway and press for upgrading East West Rail infrastructure, and services, as soon as possible. These nationally significant projects will strengthen the city’s competitive advantage and could be an integral part of... smart, shared, sustainable mobility.”
- MK:IT – “envisages that a new university would give a much needed ‘buzz’ to CMK as a whole, will stimulate the development of small businesses and act as a magnet for young entrepreneurs. It is now time to realise this... ambition to create a substantial university in CMK. This would be part of the city’s effort to become the hub of the Cambridge–Milton Keynes–Oxford arc and a key component of Renaissance CMK.”
- Learning 2050 – “... a systemic change is needed to realise substantial uplifts in school leaver attainments. This means sustaining our currently strong primary school provision along with adoption of innovative ways of working for the whole of the post-primary system. Over time, this will translate into a strong network of relationships for all schools with MK:IT.” Learning 2050 features the Milton Keynes Promise – a commitment that every young person leaving school who wishes to study at university or a vocational equivalent will be guaranteed an opportunity to do so.
- Smart, shared, sustainable mobility – “The grid road and Redways networks both offer huge capacity that should be exploited... the city must ensure that low-emission vehicles... are an integral part of future provision. We envisage that new intelligent systems... will enable commuters to share transport. It is the Government’s ambition to see the UK develop as an international leader... and it is the right time to make the case for Milton Keynes to be the flagship smart transport city.”
- Renaissance: CMK – “The CMK Alliance Plan... shows that there are almost 50 hectares of land yet to be developed in CMK. The Plan highlights the need to expand and diversify the CMK retail offer and promote new office developments, confirms the need to make provision for a new university, develop almost 5,000 new dwellings and enrich the city’s social sporting and cultural life with new facilities.”
- Milton Keynes: The creative and cultured city – “Milton Keynes is not always seen as culturally vibrant by outsiders, and has an increasingly diverse community that can feel excluded, and/or deprived... The city can meet these challenges and reposition itself by leveraging its cultural assets, people and creativity as a tool for success...”

C) Delivery mechanisms – including a more detailed ‘Strategy 2050’ and a ‘New Deal’ with Central Government.

6.2.10 Focusing on (A), the Commission draws some quite clear conclusions with implications for Plan MK spatial strategy, notably -

“... based on the research prepared for the Commission, and the consultations in support of the Commission’s work we draw three simple conclusions:

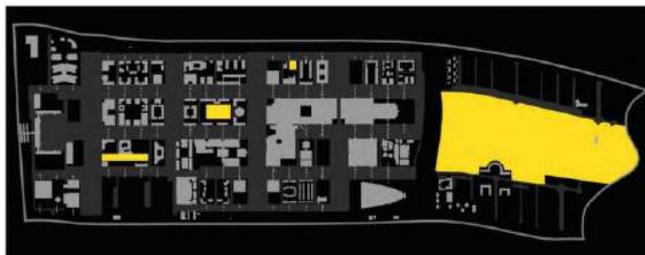
- There are many opportunities to accommodate a significant share of the city’s future growth, up to 2026 and beyond, through developing/redeveloping selected sites in the existing built-up area at higher densities – this would improve the city’s overall offer to residents today.
- However, it will not be possible to accommodate most or even a large minority of the city’s growth in this way without undermining the city’s unique, distinctive spacious qualities – we are in no doubt that this is a view shared by many of the city’s existing residents.
- Therefore, it would be desirable to accommodate much, but by no means all, of the city’s additional inclusive growth to 2050 in **substantial new developments**; these would be adjacent to the city (possibly even on the east side of the M1) and elsewhere inside the wider functional economic area.”

*We also have a clear view, in very broad terms, on where some of this additional growth on greenfield land should be accommodated to 2050. The Government’s commitment to investing in significant **improvements to the rail and road links between Cambridge, Milton Keynes and Oxford is an exceptional opportunity**. We believe it is essential that Milton Keynes does whatever it can to accelerate investment in these two important elements of the national infrastructure network.” [emphasis added]*

6.2.11 The East West Rail route is shown in **Figure 6.4**, whilst **Figure 6.5** shows the Oxford to Cambridge Expressway options under examination by the National Infrastructure Commission.

6.2.12 Further issues and opportunities for MK were also discussed through the 2016 Strategic Development Directions (SDD) consultation document, including –

- An innovative integrated transport system, perhaps using the grid roads or considering alternative methods of transport, including light rail, tram or an overhead system.
- Making better links with key destinations which could include linking up CMK with the hospital, the Stadium and Bletchley train station reflecting its future role as an interchange.
- The development of a logistics hub at Junction 13 of the M1.
- The creation of an urban buzz in CMK, with a 24/7 and 365 days a year economy, with day-and night-time transport, and a CMK that isn’t just about the shopping centre.
- Improved links with Cranfield University, which could develop to become an undergraduate university and could even be a location for a new hospital.
- Grow the reputation of MK through prestige schemes, e.g. a campus university, an Olympic-sized swimming pool, a theme park or a festival site.



The CMK Alliance Plan 2026
A Business Neighbourhood Development Plan for Central Milton Keynes

Final version for Referendum, October 2014

Figure 6.4: The East West Rail route

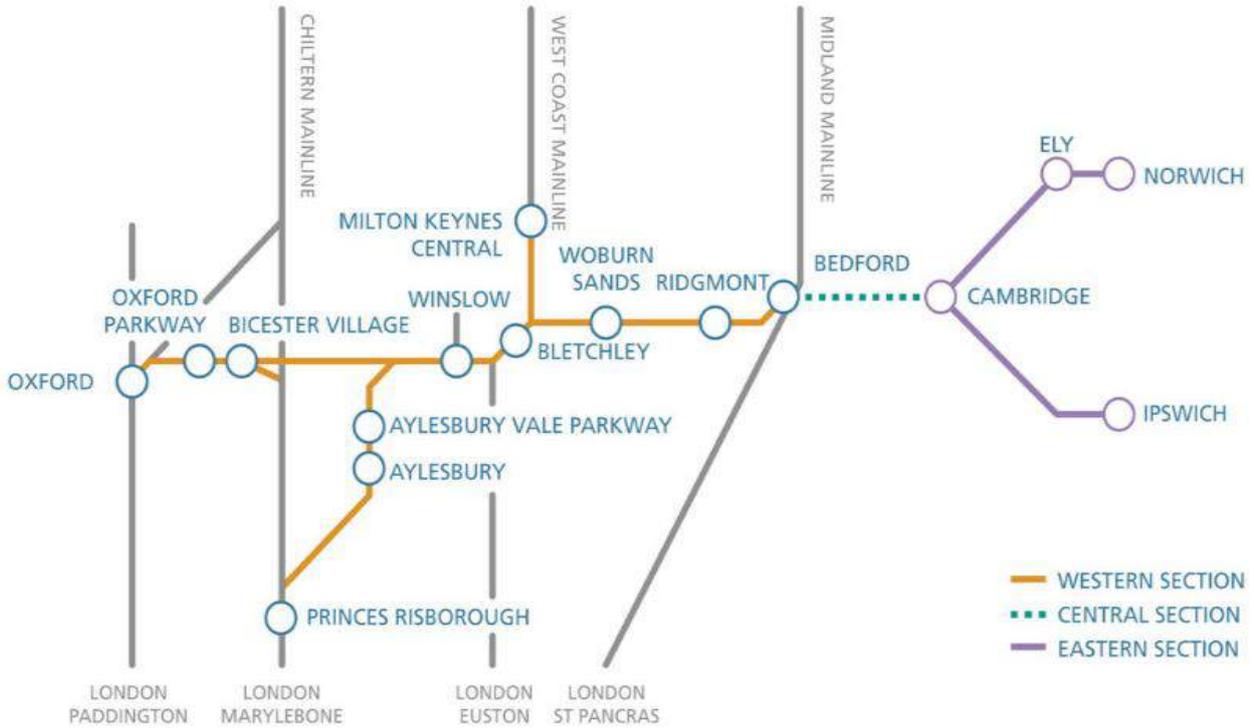
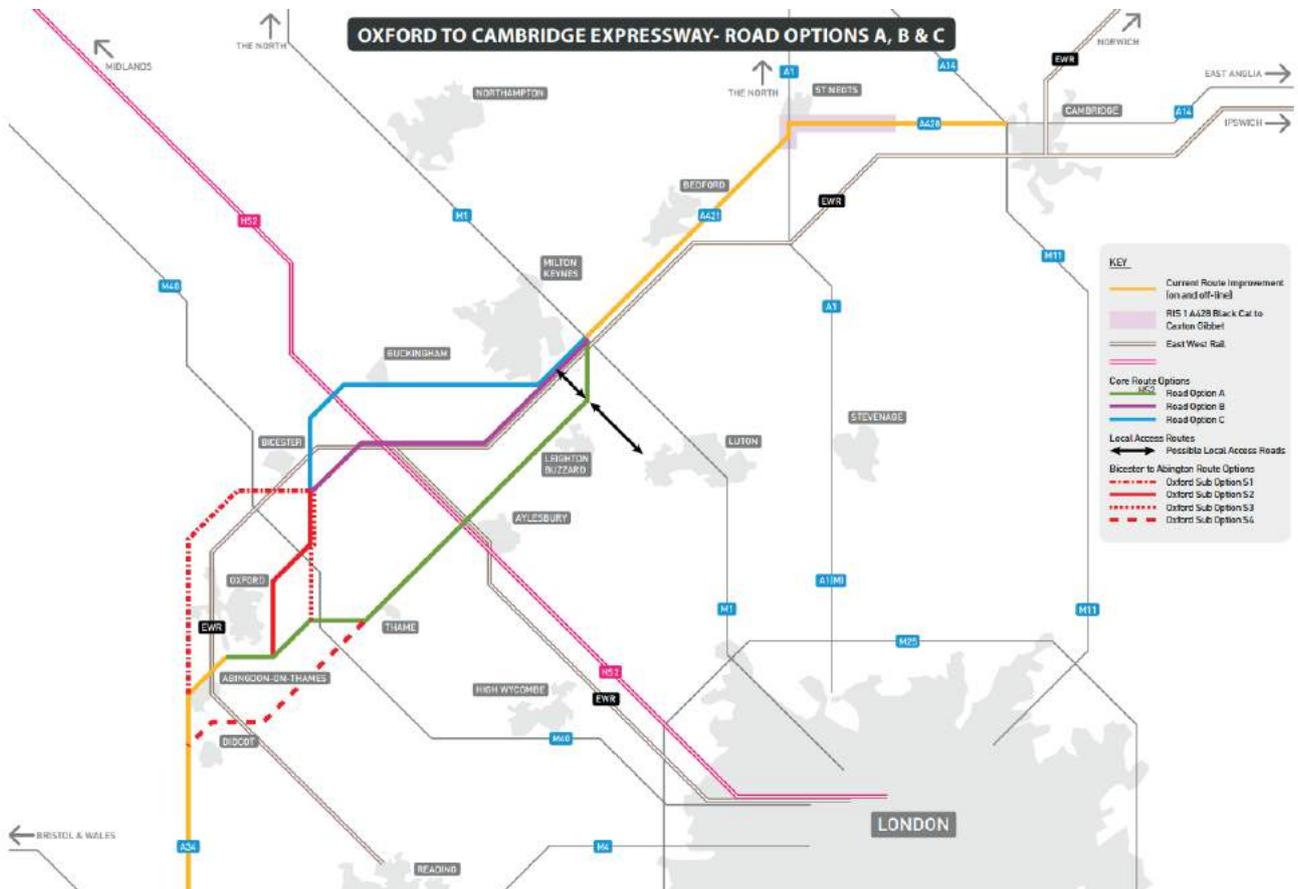


Figure 6.5: Expressway route options



MK city-specific growth issues

- 6.2.13 A key MK city-specific issue relates to housing delivery, with housing delivery rates having failed to match the projected delivery rates ('trajectory') anticipated by both the Local Plan and Core Strategy.
- 6.2.14 During the Core Strategy period (i.e. since 2010) the annualised housing delivery rate of 1,750 dwellings per year has not been reached in any year. In fact the level of 'under delivery' to date is more than 3,000 homes against that target.
- 6.2.15 Failure to deliver is against a backdrop of a substantial amount of planning consents that have been granted; in the last housing monitoring report there were 16,699 dwellings with planning consent and a further 3,904 potential units on existing Local Plan sites. This proves that there is more to achieving delivery than simply allocating land and granting consent.
- 6.2.16 This is a national problem and in February 2017 the Government published the Housing White Paper; Fixing our broken housing market. Within the White Paper there are a number of 'asks' of local authorities to boost land supply and accelerate delivery of housing.
- 6.2.17 However, there are certain known MK-specific issues -
- Despite having a large number of planning consents granted the market in Milton Keynes is dominated by four main landowners and a handful of large house builders.
 - Housing allocations, and therefore delivery, has traditionally relied on a few large, strategic sites (e.g. the Eastern and Western Expansion Areas, Oakgrove, Newton Leys), and not from smaller or medium sized sites and developers.
 - There has been very limited conversion of office accommodation to residential, unlike other parts of the country, perhaps due to the 'zoned' nature of MK.
- 6.2.18 Options for improving delivery could include -
- Promoting and developing its own land (small and medium sites);
 - Diversifying land allocation thereby catering to all aspects of the market;
 - Compulsory purchasing land with delivery potential which is not being brought forward quickly enough (e.g. Wolverton Agora);
 - Decreasing the level of obligations required from developments to incentivise and accelerate delivery;
 - Engaging with the market proactively to attract new market players and increase competition (such as attending the Homes 2017 event in London in November); and
 - Providing greater support to Small and Medium Housebuilders (SME's).

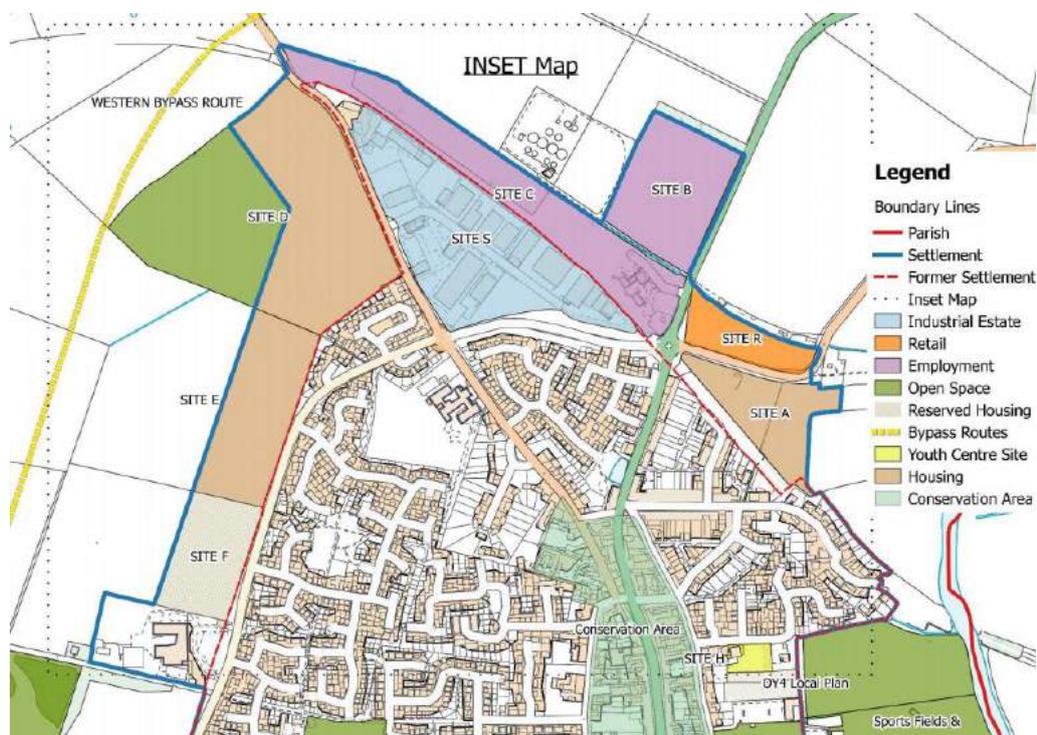
Growth opportunities elsewhere

- 6.2.19 Aside from the main MK urban area, there are three 'key settlements' in the Borough – Newport Pagnell, Woburn Sands and Olney. Newport Pagnell and Woburn Sands are quite closely associated with MK itself, whilst Olney is a rural village, in the north of the Borough.
- 6.2.20 All three key settlements have 'made' neighbourhood plans –
- Newport Pagnell Neighbourhood Plan (2016) – allocates land to deliver 1,400 homes, including a 1,200 home strategic extension to the east of the village (Tickford Fields).
 - Woburn Sands Neighbourhood Plan – does not allocate any land for housing, on the basis that –

“Over the last few years Woburn Sands has been significantly increased in size by the development of Parklands; by the time that development is completed the number of dwellings in the town will have been increased by some 55% and the town will have made a major contribution to the housing targets set out in the Milton Keynes Core Strategy. This has put a considerable strain on the infrastructure of the town (particularly in regard to the medical, highways, and recreational provisions) and the attendees at the Issues Meeting made clear that no further significant expansion should take place. While welcoming the additional population and diversity which Parklands has brought the attendees made clear that the town has already made a substantial contribution to the growth of Milton Keynes and should not be required to absorb any further growth.”

- Olney Neighbourhood Plan (2017) allocates 300 homes across three sites (see **Figure 6.6**), as well as allocating land for employment and retail uses.

Figure 6.6: Olney Neighbourhood Plan allocations



6.2.21 Having taken account of the made Neighbourhood Plans, there is limited strategic argument for Plan MK allocations at Newport Pagnell, Woodburn Sands or Olney –

- Newport Pagnell – completions/commitments will result in 21.1% growth in dwelling stock over the plan period;¹⁵ and, recent work through the neighbourhood plan process has shown other site options to perform relatively poorly, recognising the significant constraints that exist (notably flood risk). Also, there is a need to consider the possibility that Newport Pagnell may be impacted by the strategic expansion of MK, in the medium/long term.
- Woburn Sands - completions/commitments will result in 9.2% growth in dwelling stock over the plan period,¹⁶ plus there is a need to consider the very high growth directed to Woburn Sands prior to 2016. Also, there is a need to consider the possibility that Woburn Sands may be impacted by the strategic expansion of Milton Keynes, in the medium/long term.

¹⁵ Dwelling stock on 1 April 2016 was 6,499. 1,380 homes are set for completion up to 2031 (assuming all 1,200 at Tickford Fields).

¹⁶ Dwelling stock on 1 April 2016 was 1,529. 104 homes are set for completion up to 2031.

- Olney - completions/commitments will result in 13.4% growth in dwelling stock over the plan period;¹⁷ and recent work through the neighbourhood plan process has shown other site options to perform relatively poorly. Also, there is a need to recognise Olney's rural location, leading to limited potential to contribute to MK growth objectives (Olney is equally well linked to Northampton, and was previously linked by a railway line).
 - There is a potential opportunity at Olney, in that larger scale development could potentially fund, or part fund, a bypass - a scheme that has been considered for several decades, recognising that traffic congestion and air quality in Olney is an established issue.¹⁸ However, the Olney Neighbourhood plan reflects a modest growth strategy, which will not fund a bypass. The Olney Neighbourhood Plan examiner considered the option of higher growth, in the context of the bypass, but was unpersuaded, stating: *"I do not consider that [a larger extension to the west is] desirable or necessary as it would extend the development further into the countryside and closer to the possible alignment of the bypass."*

6.2.22 More generally, there is a need to recognise the following commitment made by the Council –

"Wherever possible, it is expected that the policies in made Neighbourhood Plans will continue to be applied once Plan:MK is in place. There may, however, be exceptional circumstances where revisions to over-arching strategic policies will affect Neighbourhood Plan policies and, in those cases, a parish council may want to consider revising its plan."
[emphasis added]

6.2.23 Other villages are notably smaller, and hence are suited to allocation through Neighbourhood Plans, rather than through Plan MK. None of the smaller settlements stand-out as being associated with a particular growth opportunity, that might warrant examination through Plan MK (with a view to allocation of land). The Milton Keynes Core Strategy (2013) identified Sherington, Hanslope and Bow Brickhill as standing out ('selected villages' within the settlement hierarchy); however, the Council's current position is that these villages do not stand out to such an extent that they are worthy of examination through Plan MK. All three villages have been designated as a neighbourhood plan area, and the Sherington Neighbourhood Plan was 'made' on 18th October 2017.

Opportunities for a Garden Village?

6.2.24 The Council actively encouraged 'Satellite Settlement' options to be put forward through the 2016 SDD consultation; however, no such schemes are being promoted at the current time. 'Gayhurst Garden Village' (north of Newport Pagnell / MK, in the vicinity of Gayhurst / south of Stoke Goldington) has been promoted in the past, and was assessed as a strategic site option within the March 2017 Interim SA Report; however, that scheme is no longer being promoted.

¹⁷ Dwelling stock on 1 April 2016 was 2,845. 380 homes are set for completion up to 2031.

¹⁸ The Buckinghamshire Local Transport Plan 3 (LTP3) describes poor air quality in Olney as being 'of particular note', and states support for an Olney Bypass. The Olney Air Quality Management Area (AQMA) is the only such area designated in the Borough.

6.3 Site options

Introduction

6.3.1 Having discussed high-level, or ‘top-down’, considerations with a bearing on the development of spatial strategy alternatives, this section give consideration to ‘bottom-up’ considerations, i.e. the site options that are the ‘building blocks’ for establishing spatial strategy alternatives.

6.3.2 This section gives consideration to site options within –

- the MK urban area;
- the MK edge; and
- the rural area.

Site options within the MK urban area

6.3.3 Site options in the MK urban area are identified and assessed within the Council’s Strategic Housing Land Availability Assessment (SHLAA; 2017). Specifically, the SHLAA assesses 146 sites in the urban area, with a notional total capacity of 7,575 homes.

6.3.4 For each site, the SHLAA concludes on whether or not the site is suitable, available and achievable -

- 47 sites (capacity 2,675 homes) pass these tests, and in turn are classified by the SHLAA as either: ‘deliverable’, meaning that they are able to come forward for development within five years; or ‘developable’, meaning that they are able to come forward within years 6 to 15 of the plan period.
- 99 sites (capacity 5,100 homes) fail one or more of these tests, and hence are classified as not deliverable or developable. A final notable point is that, of these 99 sites, 61 (capacity 2,142 homes) fail only on the basis that the site is currently designated for another use (i.e. a non-residential use). The implication is that these sites could be considered ‘deliverable or developable’, were Plan:MK to propose a policy change.

Site options on the MK edge

6.3.5 The SHLAA assesses 15 sites, with a notional total capacity of 36,500 homes. Again, for each site, the SHLAA concludes on whether or not the site is suitable, available and achievable -

- 10 sites (capacity 35,000 homes) pass these tests (on the assumption that a policy change is implemented through Plan:MK to remove the current ‘open countryside’ designation), and in turn are classified by the SHLAA as deliverable and/or developable.
- 5 sites (capacity 1,500 homes) fail one or more of these tests, and hence are classified as not deliverable or developable.

6.3.6 **Table 6.2** introduces each of the MK urban edge sites, regardless of the SHLAA conclusion. In addition, Table 6.2 considers two sites not examined through the SHLAA because of a disconnect from the existing urban edge (taking account of commitments).

6.3.7 **Figure 6.8** shows each of the MK urban edge sites listed in Table 6.2. For context, the figure also shows:

- Employment site options - namely 'Caldecotte South', 'East of M1 / South of the A422' and 'North East of Newport Pagnell' (N.B. none of these sites are considered suitable for housing, and only employment uses have been promoted);
- Major commitments - specifically the 'Expansion Areas' allocated through the 2005 Local Plan and the Core Strategy (2013) Strategic Land Allocation;
- Major commitments within Aylesbury Vale District - specifically two recently permitted schemes that will expand the edge of MK into 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. Specifically:
 - Whaddon Chase - is listed as suitable within the AVDC HELAA (2017), and is considered as part of the appraisal of 'reasonable alternatives' within the SA Report.
 - Saldon Chase - comprises several sites listed as unsuitable within the AVDC HELAA, but nonetheless considered as part of the appraisal of reasonable alternatives within the SA Report.
 - Eaton Leys - is listed as unsuitable within the AVDC HELAA and is not considered as part of the appraisal of 'reasonable alternatives' within the VALP SA Report, i.e. it is screened out prior to that stage of analysis.

6.3.8 Figure 6.8 serves to demonstrate that opportunities are being explored around the full perimeter of MK. One area notable for a lack of site options is the area directly to the south of the urban area; however, this is an area of constraint recognising that: A) the area within the MK borough boundary is constrained by a landfill site; and B) land between the MK edge and Newton Longville functions as an important landscape gap.

Site options in the rural area

6.3.9 The SHLAA (2017) does not consider site options within the rural area; however, site options were defined through the 2012 SHLAA, and additional site options were identified through the 2017 call for sites. Finally, to reiterate (see para 6.2.24, above) there are no garden village / new settlement options being promoted in the rural area.

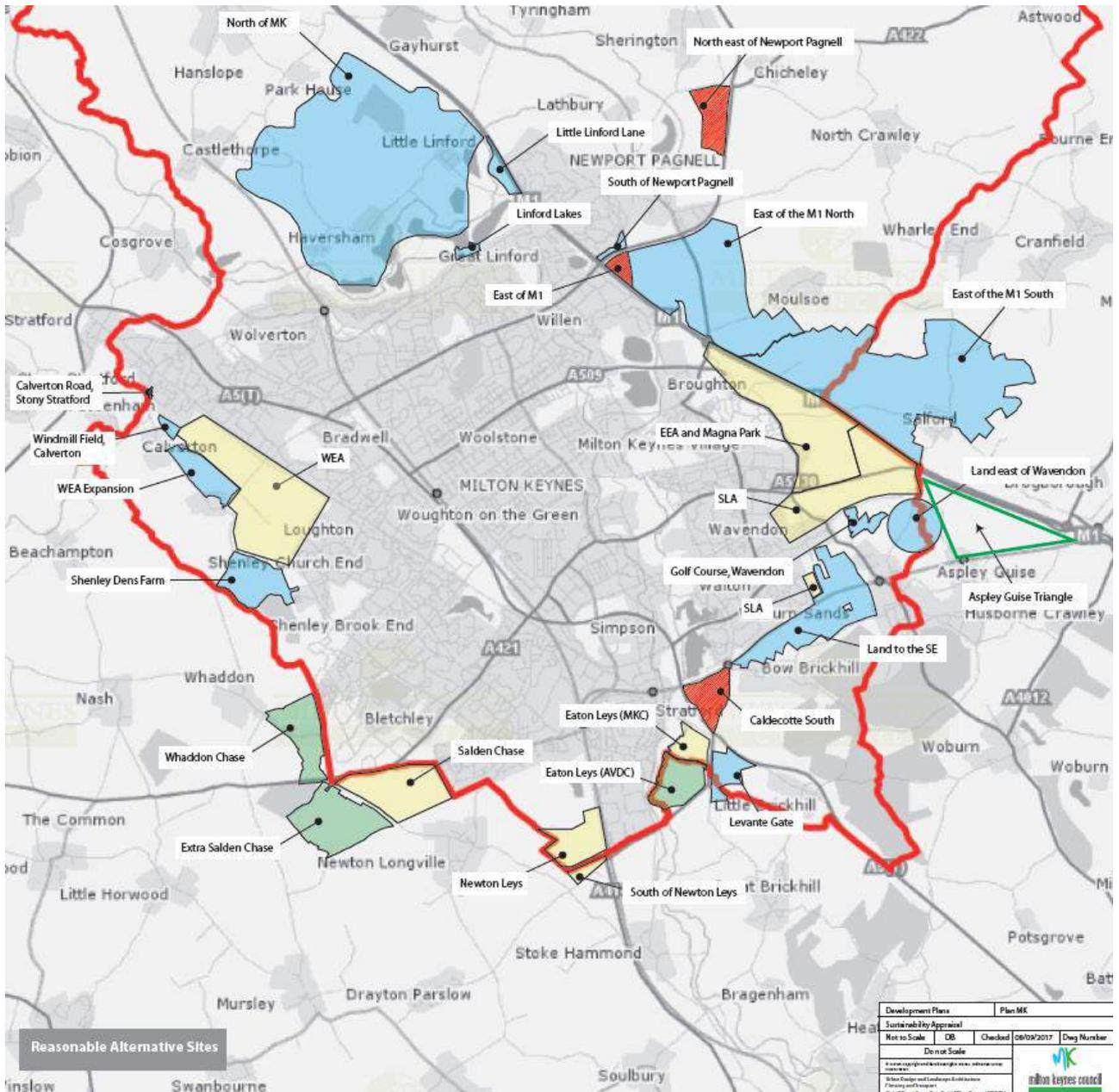
Table 6.2: MK urban edge housing site options

Ref	Name	Scale*	Commentary
1	Calverton Road, Stony Stratford	21	<ul style="list-style-type: none"> North West of Milton Keynes (Stony Stratford), bounded to the west by the Great Ouse (and to the east by a smaller river channel).
2	Belvedere Farm 1	22	<ul style="list-style-type: none"> One the eastern edge of Fenny Stratford (Close to the rail station), west of the A5.
3	Belvedere Farm 2	113	<ul style="list-style-type: none"> One the eastern edge of Fenny Stratford (Close to the rail station), west of the A5.
4	Windmill Field, Calverton	148	<ul style="list-style-type: none"> North West of Milton Keynes (Stony Stratford), comprising the gap between Stony Stratford and the small village of Calverton.
5	Linford Lakes	250	<ul style="list-style-type: none"> North of Milton Keynes (Great Linford), bounded on three sides by Linford Lakes. Assessed as a non-strategic site option within the March 2017 Interim SA Report.
6	Little Linford Lane	344	<ul style="list-style-type: none"> North of Milton Keynes / west of Newport Pagnell (separated by the M1), bounded to the west by the Great River Ouse. Assessed as a non-strategic site option within the March 2017 Interim SA Report
7	South of Newport Pagnell	500	<ul style="list-style-type: none"> Agricultural land directly south of Newport Pagnell, north of the A422 and west of Willen Rd. Comprises 'potential housing site 5' considered as a housing site option, and ultimately rejected, through the Newport Pagnell Neighbourhood Plan (2016; see pg. 6). Adjacent land east of Willen Rd. has also been promoted, but can be screened-out as allocated for a linear park extension/recreation through the Neighbourhood Plan (Policy NP8). The total proposed housing yield of the two sites is 1,000; hence, 500 homes is an approximate yield for just the western site.
8	Levante Gate	625	<ul style="list-style-type: none"> Land to the east of the recently permitted Eaton Leys site, comprising a triangle of land to the south of A5/A4146 junction, close to the Borough's southern extent.
9	Wavendon Golf Course	700	<ul style="list-style-type: none"> Golf course east of Wavendon, south of the Core Strategy Strategic Land Allocation; comprising much of the 'triangle' of land bounded by Newport Rd, Lower End Rd and Cranfield Rd. Assessed as an element of the 'Wavendon and Woburn Sands' strategic site option within the March 2017 Interim SA Report.
10	Caldecotte South	994	<ul style="list-style-type: none"> Triangle of land south of MK, bounded by the A5, railway and Brickhill Street. N.B. Also promoted as an employment site option.
11	WEA Expansion	1,000	<ul style="list-style-type: none"> Two sites to the west of the Western Expansion Area (the c.6,000 home Local Plan 2005 allocation, which is under construction). Assessed as a strategic site option within the March 2017 Interim SA Report.
12	Shenley's Den Farm	1,500	<ul style="list-style-type: none"> South of the Western Expansion Area (the c.6,000 home Local Plan 2005 allocation, which is under construction).

Ref	Name	Scale*	Commentary
13	Wavendon / Woburn ('eastern') broad area	1,500+	<p>In addition to Wavendon Golf Course (discussed above), there is developer interest in the remaining area of land in the Woburn Sands area, north of the railway.</p> <p>The first point to note is that a 200 home scheme at 'Land North of Cranfield Road, Woburn Sands' was refused planning permission in January 2017 (16/00672/OUT; an appeal is pending). This site is associated with Woburn Sands, rather than the edge of MK, but could be seen to loosely adjoin the MK edge were the Wavendon Golf Course site also to come forward.</p> <p>An eastwards 'expansion' to this site, essentially comprising the remaining land within MK borough, was then proposed in 2016, through the SDD consultation. However, no site boundary was proposed, and the site was not promoted through the 2016 Draft Plan:MK consultation.</p> <p>Finally, a large cross boundary site in this area (the majority within Central Bedfordshire District) was proposed in 2016, through the SDD consultation. However, the site was not promoted through the 2016 Draft Plan:MK consultation.</p> <p>In short, it is clear that there is feasibly the opportunity to complete the eastwards expansion of MK in this direction, and for the expansion to cross over into the 'Apsley Guise Triangle' part of Central Bedfordshire.</p>
14	South East MK	3,000	<ul style="list-style-type: none"> • Mostly adjoins the existing SE MK urban edge, south of Tilbrook / Brown's Wood (and the railway) and north of Bow Brickhill; also includes a northern section, abutting the eastern edge of the Core Strategy Strategic Land Allocation southern section, west of Woburn Sands / south of Wavendon. • Proposed as an allocation in Draft Plan MK (2017); with 1,000 homes in the plan period. • Assessed as a site option within the March 2017 Interim SA Report.
15	East of M1 (north)	3,000+	<ul style="list-style-type: none"> • East of the M1, south of Newport Pagnell (A422). • Proposed as a 'reserve site' in Draft Plan MK (March 2017). • Assessed as a site option within the March 2017 Interim SA Report.
16	East of M1 (south)	3,000+	<ul style="list-style-type: none"> • East of the M1, southeast of Moulsoe; cross-border site (the majority falling within Central Bedfordshire).
17	North of MK	3,000+	<ul style="list-style-type: none"> • North of the Great Ouse, and the villages of Haversham and Little Linford, between the West Coast Mainline and M1. • Assessed as a site option within the March 2017 Interim SA Report (along with a smaller 'Haversham Extension' option, which can now be discounted, as it is not being promoted).

*The figure given is for the number of homes to be delivered in the plan period. Where sites would have the potential to deliver additional homes beyond the plan period, including potentially cross-boundary development within Central Beds District, this is indicated with a '+'.

Figure 6.8: 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.

6.4 Refined site options

Introduction

- 6.4.1 Having undertaken the 'initial' steps of examining high-level issues/options and site options, the Council, working in collaboration with AECOM, recognised the need for a further 'interim' step, ahead of defining spatial strategy alternatives.
- 6.4.2 Specifically, an interim step involved screening the 17 MK edge site options introduced in Table 6.2, above, and then subjecting the resulting shortlist to more detailed examination.
- 6.4.3 This section firstly considers the screening process, and then goes on to present a more detailed examination of the resulting short-list.

Screening MK urban edge site options

- 6.4.4 As discussed above, in order to arrive at refined list, or 'shortlist' of MK urban edge site options, there was a need to 'screen' the 17 site options listed in Table 6.2. Screening outcomes are presented in Table 6.3.

Table 6.3: Screening MK urban edge housing site options

Ref	Name	Commentary	Screening outcome
1	Calverton Road, Stony Stratford	<ul style="list-style-type: none"> All are small sites (<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. 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. 	Out
2	Belvedere Farm 1		
3	Belvedere Farm 2		
4	Windmill Field, Calverton		
5	Linford Lakes		
6	Little Linford Lane		
7	South of Newport Pagnell	<ul style="list-style-type: none"> Not supported by the Newport Pagnell Neighbourhood Plan.¹⁹ 	Out
8	Levante Gate	<ul style="list-style-type: none"> 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 at that point would not relate well. 	
9	Wavendon Golf Course	<ul style="list-style-type: none"> Medium-scale urban extension site associated with notable issues, but worthy of more detailed examination. 	In
10	Caldecotte South	<ul style="list-style-type: none"> Better suited to employment use. 	Out
11	WEA Expansion	<ul style="list-style-type: none"> Medium-scale or large-scale urban extension sites associated with notable issues, but worthy of more detailed examination. 	In
12	Shenley's Den Farm		
13	Wavendon / Woburn ('eastern') broad area		
14	South East MK		
15	East of M1 (north)		
16	East of M1 (south)		
17	North of MK		

¹⁹ 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>

Examination of the shortlist

- 6.4.5 The ‘screened-in’ MK urban edge site options were taken forward for more detailed analysis. The aim of this section is to report on that analysis. 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 Section 6.5, below).
- 6.4.6 **Appendix III** presents detailed analysis of the shortlisted site options. **Table 6.4** presents summary findings.

Table 6.4: Examination of shortlisted MK edge site options following informal analysis in isolation

Ref	Name	Conclusions following examination
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) ²⁰ 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, ²¹ 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.

²⁰ Landscape Sensitivity Study to Residential Development in the Borough of Milton Keynes and Adjoining Areas (Gillespies, 2016)

²¹ The Strategic Land Allocation was the main allocation made through the Core Strategy (2013).

Ref	Name	Conclusions following examination
12	Shenley's Den 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.²⁰ In 2005 the Local Plan Inspector concluded, in respect of a virtually identical site: "<i>[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.</i>" 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).²²</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').²⁰</p>

²² 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 following examination
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'²⁰) 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>

6.5 The reasonable alternatives

Introduction

- 6.5.1 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.
- 6.5.2 This section firstly considers options for each of the three broad areas within the borough in turn, and then concludes by presenting the reasonable alternatives.

MK urban area

- 6.5.3 The Council consulted on options for the MK urban area in 2016 (SDD consultation) and early 2017 (Draft Plan MK consultation; see appraisal of urban focus vs. rural focus alternatives, and broad housing distribution options, within the March 2017 Interim SA Report). In summer 2017 the Council recognised that there remained a strategic choice, i.e. the approach to growth should be a **variable** across the reasonable spatial strategy alternatives.

- 6.5.4 Two options were identified -

2,900 homes - involving the 47 sites deemed deliverable or developable by the SHLAA, plus three additional sites.²³

3,500 homes - involving 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 (as discussed at para 6.3.4, above).

Specifically, of the 61 sites, all are supported except those with a capacity below 10 homes, and three sites with notable issues.²⁴

In effect, this higher growth option involves addition of 20 sites currently designated as **open space** (capacity c.400 homes) and 8 sites (capacity c.300 homes) currently designated for an **employment, commercial or community use**.

N.B. the option of following an approach to growth as per that proposed through Draft Plan:MK (March 2017) can be dismissed as unreasonable. Draft Plan:MK proposed provision for 5,000 homes; however, this figure was arrived at prior to the SHLAA (specifically, it was arrived at on the basis of the Urban Capacity study). The SHLAA is now understood to be the most robust, up-to-date evidence-base.

MK urban edge

- 6.5.5 The Council consulted on options for the MK urban edge in 2016 (SDD consultation) and early 2017 (Draft Plan MK consultation; see appraisal of broad housing distribution options, and strategic site options, within the March 2017 Interim SA Report). In summer 2017 the Council recognised that there remained a strategic choice, i.e. the approach to growth should be a **variable** across the reasonable spatial strategy alternatives.
- 6.5.6 Specifically, it was deemed necessary to vary the approach to growth across two sites on the MK edge - see **Table 6.5**. Other sites were deemed to be ruled-out of contention, in light of the evidence available, including the analysis of site options discussed in Section 6.4, above.

²³ The three additional sites are: Milton Keynes Rugby Club, Greenleys; Warren Hill Farm, Wolverton Mill; and The Walnuts, Redhouse Park. The former site is currently designated as open greenspace, but redevelopment secure new community facilities; whilst the latter two sites are designated as employment land, but are deemed suitable for a change of use to residential or mixed use.

²⁴ The three sites are: E1.1, CMK (residential development would be contrary to the CMK Neighbourhood Plan); Station Square, CMK (a complex site); and South of Bletchley (a large, complex site that crosses the border into Aylesbury Vale)

Table 6.5: MK edge variables/options for the purposes of establishing spatial strategy alternatives

Variable (site)	Options	Notes
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. The risk is considered relatively low; however, it is pragmatic to test the option of the site not delivering in full within the plan period (which was the preferred option at the Draft Plan MK stage).
	3,000 homes	
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 within the plan period .
	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 employment land ; thereby negating the need for any other employment land allocation. Specifically, it would negate the need to allocate South of Caldecotte (see Figure 2).

Rural area

6.5.7 The Council consulted on options for the rural area in early 2017 (Draft Plan MK consultation; see appraisal of urban focus vs. rural focus alternatives, and appraisal of broad housing distribution options, within the March 2017 Interim SA Report). In relation to the appraisal of urban vs. rural focus alternatives, the following is a notable conclusion -

“... It is also anticipated that delivering a higher proportion of new homes in rural areas may lead to a need for additional supporting infrastructure in rural areas to support a larger local population, depending on location, which may subsequently have a greater environmental impact and financial cost than it would in the urban area. Increased journey to work times are also envisaged if a higher proportion of the population live further away from the urban area where the majority of jobs are located.”

6.5.8 In relation to the appraisal of broad housing distribution options, the following is a notable conclusion -

“... Options A, D and E are likely to be able to deliver some homes in the short-term. Effects on the environment also vary with Options A and E likely to have the lowest negative impact on the environment compared to the other options which involve significant development on greenfield land... Furthermore, given the need to deliver 6,775 homes through the Local Plan, a strategy that seeks to deliver homes in several different locations and not focusing on only one of the growth options above would result in a more robust strategy that will likely deliver homes in the short, medium and long-term.”

6.5.9 In conclusion, on the basis of appraisal findings, and recognising additional strategic considerations (see discussion at paras 6.2.14 to 6.2.18, above) it was determined that nil allocations in the rural area is a clear preferred option, hence the approach to growth should be a **constant** across the district-wide reasonable spatial strategy alternatives.

The reasonable alternatives

- 6.5.10 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.
- 6.5.11 The discussion above lists three variables (urban area, SE MK and East of M1), with two options identified for two of the variables (urban area and SE MK) and three options identified for the third variable (East of M1). As such, the discussion above leads to 12 possible packages of site allocations. However, four of these options would involve providing for a number of homes more than 15% above OAHN, and hence can be dismissed as unreasonable. This leaves eight spatial strategy alternatives – see **Table 6.6**.

Table 6.6: The reasonable 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
Total supply	27,580	28,180	29,080	29,080	29,680	29,680	30,580	30,580
Target buffer	4%	6%	10%	10%	12%	12%	15%	15%
Employment land allocation	S. Caldecotte	S. Caldecotte	E of M1	S. Caldecotte	E of M1	S. Caldecotte	E of M1	E of M1

7 APPRAISING REASONABLE ALTERNATIVES

7.1 Introduction

7.1.1 The aim of this chapter is to present summary appraisal findings in relation to the reasonable alternatives introduced above. Detailed appraisal findings are presented in **Appendix IV**.

7.2 Summary alternatives appraisal findings

7.2.1 **Table 7.1** presents summary appraisal findings in relation to the nine alternatives introduced above. Detailed appraisal methodology is explained in Appendix IV, but in summary:

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** / **amber** / **green**) and also rank the alternatives in order of performance. Also, '=' is used to denote instances where the alternatives perform on a par (i.e. it not possible to differentiate between them).

Table 7.1: Summary spatial strategy 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	★1

Topic	Rank of performance / categorisation of effects							
	Opt 1	Opt 2	Opt 3	Opt 4	Opt 5	Opt 6	Opt 7	Opt 8

Conclusion

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.

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).

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.

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. Notable issues/impacts include –

- 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.
 - 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).
- 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.
- 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).

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 over the plan period.

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.

8 DEVELOPING THE PREFERRED APPROACH

8.1 Introduction

8.1.1 The aim of this Chapter is to present the Council's response to the alternatives appraisal / the Council's reasons for developing the preferred approach in-light of alternatives appraisal.

8.2 The Council's outline reasons

8.2.1 The Council's preferred approach is Option 4, which the appraisal finds to have pros and cons, as per all the alternatives.

8.2.2 The following text, which is provided by the Council, explains the justification for supporting the preferred option -

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

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

PART 2: WHAT ARE SA FINDINGS AT THIS CURRENT STAGE?

9 INTRODUCTION (TO PART 2)

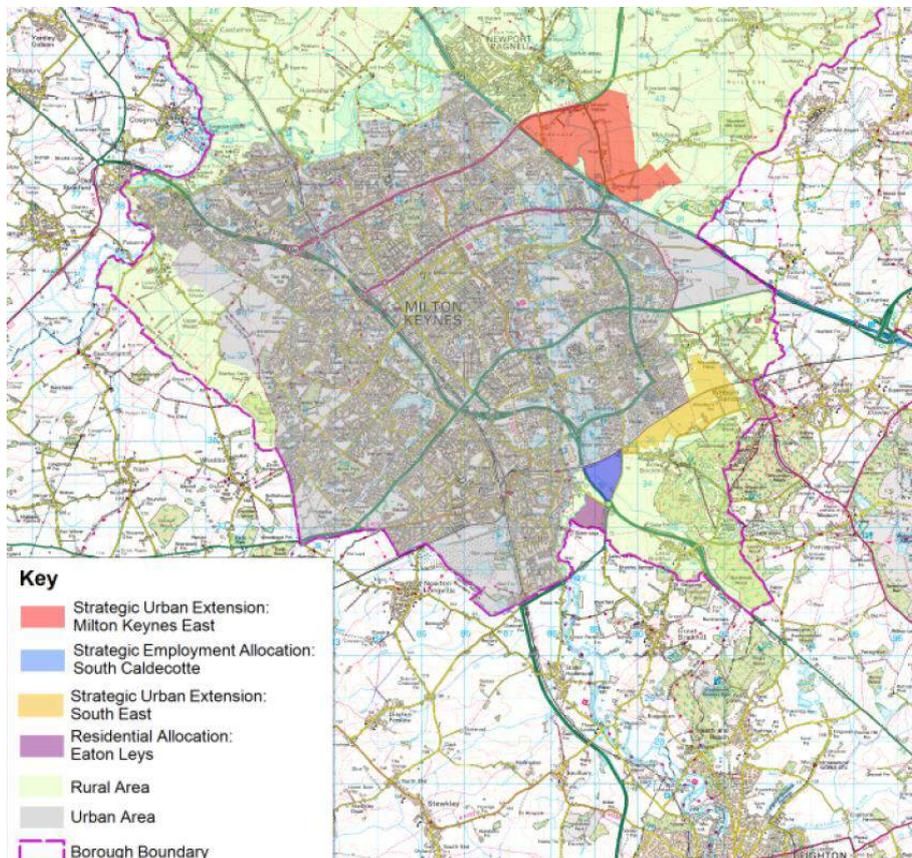
- 9.1.1 The aim of this part of the report is to present an appraisal of the Proposed Submission Plan.
- 9.1.2 By way of introduction, this chapter introduces the Proposed Submission, and also discusses the appraisal methodology.

9.2 The Proposed Submission Plan

9.2.1 The plan essentially comprises -

- 1) a 'Development strategy' and, linked to this, a series of strategic site allocation policies - see **Figure 9.1**. There are three further points to note -
 - One of the strategic site allocations ('Land east of the M1') will only come forward should it be the case that the Council is successful in a its recent bid to Government to receive funding for new infrastructure.
 - Sites allocated in the urban area are not assigned a site allocation policy (with the exception of two sites – SD20 and SD21), but are listed within the plan (Appendix A).
 - Site allocation policies SD6 to SD9, and site allocation policy SD15, deal with sites that are already permitted, on the basis that permissions could feasibly lapse, and were this to happen there would be a need for new applications, guided by policy. Allocation of these sites is considered an element of the 'baseline' situation, and hence these five policies are not a focus of appraisal.
- 2) a series of thematic, development management type policies.

Figure 9.1: The Key Diagram



9.3 Methodology

9.3.1 The appraisal identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability objectives identified through scoping (see Table 4.1) as a methodological framework. In total, there are 19 objectives relating to:

- Communities
- Deprivation
- Education
- Health
- Homes
- Services
- Air quality
- Biodiversity
- Climate change
- Heritage
- Landscapes
- Nat resources
- Noise
- Transport
- Water
- Waste
- Business
- Economy
- Employment

9.3.2 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policies under consideration, and understanding of the baseline (now and in the future under a 'no plan' scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g. in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously, and explained within the text (with the aim of striking a balance between comprehensiveness and conciseness/ accessibility to the non-specialist). In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is possible to comment on merits (or otherwise) of the draft plan in more general terms.

9.3.3 Finally, it is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations.²⁵ So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered, i.e. the potential for the plan to impact an aspect of the baseline when implemented alongside other plans, programmes and projects (albeit such other plans, programmes and projects might alternatively be considered as part of the baseline). These effect 'characteristics' are described within the appraisal as appropriate.

Structure of the appraisal

9.3.4 The appraisal is structured as follows –

- Each section deals with one of the 19 SA topic headings
- Each section is split under four further headings –
 - Commentary on the spatial strategy
 - Commentary on other policies
 - Appraisal of the Proposed Submission Plan.

9.3.5 As such, the appraisal presented below comprises a series of 57 narratives.

N.B. within these narratives, specific policies are referenced as necessary, but it is not the case that systematic consideration is given to the merits of every plan policy in terms of every sustainability topic/objective/issue. This approach is in accordance with the regulatory requirement, which is simply to present an appraisal of 'the plan'.

²⁵ Environmental Assessment of Plans and Programmes Regulations 2004

10 APPRAISAL OF THE PROPOSED SUBMISSION PLAN

10.1 Introduction

10.1.1 As introduced above, the aim of this chapter is to present an appraisal of the Proposed Submission Plan, under SA framework.

10.2 Communities

Reduce levels of crime and create vibrant communities

Commentary on the spatial strategy

10.2.1 In combination with completions since the start of the plan period (1,247 homes), existing allocations and permissions ('commitments' 20,603 homes), and a windfall allowance (1,330), the proposal is to allocate land sufficient to deliver 5,900 homes (not counting the East of M1 allocation; see further discussion of this site, below). As such, the proposal is to provide for a total supply of land sufficient to deliver 27,750 homes (1,247+20,603+5,900) over the plan period, which together with the windfall allowance of 1,330 amounts to providing for 29,080 homes, or OAHN plus 9.7% in theory. 9.7% a sizeable 'buffer', and could be more than is needed in order to provide a contingency for unforeseen delays at permitted or allocated sites. There is no way to be certain, but it is fair to say that the buffer may be sufficient to provide for a quantum of homes 'above OAHN in practice', i.e. even accounting for unforeseen delays. A benefit of providing for 'above OAHN' would relate to providing more fully for affordable housing, which has 'communities' implications (see further discussion below, under 'Housing'); however, there are also potentially 'communities' draw-backs (see discussion of specific sites, below). There are three further important points to note, regarding housing quanta -

- 1) The number of homes provided for in practice could be significantly less than 29,080, if it is the case that the South East MK strategic site allocation does not deliver in full within the plan period. There is a possibility of this happening, recognising that masterplanning of the site cannot be concluded until Government announces the preferred route of the Oxford to Cambridge Expressway, and recognising that a decision to route the expressway through the site would lead to further delay in delivering housing, and significantly reduce the number of homes that can be delivered on the site. Were the site to deliver 2,000 homes in the plan period, rather than 3,000 as anticipated, then the plan would provide for OAHN plus 6% in theory; whilst delivery of 1,000 homes at the site would mean the plan providing for OAHN plus 2.2% in theory. 2.2% is a small buffer, recognising the track record of delivery issues in Milton Keynes (see paras 6.2.13 to 6.2.19), and hence there would be a risk of OAHN not being provided for in practice. However, there is no certainty. The NPPF suggests a need to provide for a buffer ("*Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change*"), but there are no established rules-of-thumb regarding the scale of buffer that is necessary, in any given situation.
- 2) The calculations presented above assume non-delivery of the 'East of M1' strategic site allocation. The site is allocated, but planning permission is contingent on significant funding for new infrastructure being provided by the Government (the Council recently submitted a bid for funding, through the Housing Infrastructure Fund scheme). There is no certainty regarding whether the site will deliver in the plan period, but were it to deliver 3,000 homes²⁶ then the effect would be to provide for OAHN plus 21% in theory.
- 3) Additional housing may come forward through the Council's estate regeneration programme and from regeneration projects in Central Bletchley and Wolverton; however, there is currently no certainty regarding the numbers of new homes involved, and so it is not possible to take this into account.

²⁶ The total capacity of the site, going beyond 2031, is perhaps 5,000 plus there is the potential for significant further expansion of the site. 3,000 homes is considered the maximum number of homes that might be delivered in the plan period.

- 10.2.2 Having introduced the matter of housing quanta, the following bullet points examine more closely the 'communities' implications of the proposed spatial strategy -
- A primary consideration is the need to support larger schemes, which are able to deliver strategic community infrastructure. This in turn leads to a suggestion that there is merit to focusing growth to the greatest extent. In particular, the East of M1 allocation (the proposed strategy could potentially involve 3,000 in the plan period, with the potential for significant further growth beyond the plan period) would, in all likelihood, deliver a secondary school.
 - However, there are potential draw-backs to the East of M1 scheme, given distance to CMK and severance caused by the M1.
 - The South East MK scheme could also deliver significant new community infrastructure, although there is less certainty at this stage, and there is currently no proposal (and thereby no certainty) relating to secondary school provision (see further discussion below, under 'Education'). There is benefit to progressing the site as a whole in the plan period, rather than delivering growth on just one side of the railway within the plan period, as this will enable the site to be masterplanned as a whole. This is particularly important given that the railway will act as a barrier to movement (albeit a new bridge would be provided).
 - However, another consideration is the need to manage the pace of growth to the east of MK, recognising the scale of recent and committed growth at the Eastern Expansion Area and at the Strategic Land Allocation. Construction works, and associated traffic, will have an impact on amenity, and there is also a need to enable new services and facilities to 'bed in'. This factor potentially serves as an argument for supporting a phasing of growth at South East MK in particular.
 - Allocations are proposed to deliver a significant number of new homes (1,900) within CMK. This strategy is supported, from a 'communities' perspective, given accessibility to services, facilities, employment and retail, and also given proximity to the major asset of Campbell Park. Policy SD2 (Central Milton Keynes - Role and Function) notably states: *"Developments will need to provide flexible and adaptable accommodation meeting a range of needs including those of older people and young professionals, and families, especially within Campbell Park. The role of Campbell Park as the city centre park will be maintained and links to the park will be improved, where opportunities arise."*
 - The number of new homes supported at sites allocated within the existing urban area of Milton Keynes has been reduced from 5,000 homes, at the Draft Plan:MK stage, to 2,900 (i.e. 1,900 within CMK plus 1,000 elsewhere) in light of the Strategic Housing Land Availability Assessment. The current proposed strategy avoids allocation of open spaces, even where there is evidence to suggest that they are underused, with one exception. Specifically, Milton Keynes Rugby Club, Greenleys is allocated for the reason that development will enable improvements to the existing community facilities on-site, namely the redevelopment of an existing sports facility to include the provision of a 3g playing pitch and a new club house and changing rooms facility.
 - The proposal is no longer to assign a number of homes to the rural area (i.e. settlements outside of the MK urban area), to be delivered through neighbourhood plans. The plan document explains that: *"With two more new neighbourhood plans to be approved next on the agenda, we think that the scope for the remaining neighbourhood plans to propose significant amounts of housing is limited."*
- 10.2.3 The following other strategic policies have positive implications for 'communities' objectives -
- Policy SD1 (Place-Making Principles for Development) - requires principles including: *"The structure and layout of development is based on the principles that have shaped the original city, especially the grid road system, redways, linear parks and strategic, integrated flood management with employment incorporated as part of the development or located nearby."*

- Policy SD13 (South East Milton Keynes Strategic Urban Extension) states: “A comprehensive development framework for the site will be prepared in accordance with policies SD1, SD11, SD12 and INF1 and approved by the Council prior to planning applications being submitted.” It is **recommended** that detail might be added to this policy, in particular regarding infrastructure requirements, notably a new road bridge and community infrastructure, to include a secondary school.
- Policy SD14 (Milton Keynes East) states: “Amongst others, the development will comprise... Delivery of new homes, providing a range of sizes, types and tenures, including affordable housing... [and] Associated infrastructure including primary and secondary education, community facilities, health, retail and local services and a hotel. The development should comprise at least one district centre with a co-location of key facilities.”

Commentary on other policies

- 10.2.4 Policy **ER15** (New Local Centres) outlines the intent to designate seven areas as ‘New Local Centres’ in order to ensure that residents in new residential development areas will be within a short distance (500 metres) of services and facilities, maximising the opportunity for them to walk, cycle or travel via public transport. Notably, the policy seeks to maintain local facilities and enhance community vitality, and is supported by Policy **ER12** (Protection of Local Shops, Post Offices, Banks), Policy **ER13** (New Village Shops in the Rural Area) and Policy **ER14** (Non-Retail Uses in Local Centres).
- 10.2.5 Policy **D7** (Temporary Buildings) states that planning permission will only be granted for temporary buildings if they ‘*meet demonstrable essential short-term needs in the borough*’. Expanding on this point, the policy might benefit from defining what is meant by the term ‘needs’, perhaps recommending that temporary buildings must demonstrate that they will have ‘*positive short-term community benefits*’.
- 10.2.6 Policy **D5** (Canalside Development) states that development alongside canals should help meet a number of objectives which both directly and indirectly relate to the vibrancy of the community, including (amongst other things), ‘*improved public access to an enjoyment of the waterway, the protection and enhancement of wildlife habitats, and the retention and enhancement of significant waterside buildings*’. Notably, the policy aims to ensure that the potential constraints of development are also considered, particularly in relation to flood risk and the local landscape character.
- 10.2.7 Policy **D4** (Amenity and Street Scene) outlines that ‘*all proposals will be required to create and protect a good standard of amenity for buildings and surrounding areas*’, and in particular, should ensure (amongst other things) that the siting, layout and design of new buildings, open spaces, vehicle and cycle parking areas ‘*maintain an attractive and coherent street scene*’.
- 10.2.8 Policy **D3** (Design of Buildings) highlights a range of design objectives and principles for which development proposals need to meet, with particular focus on the creating a strong and positive identifiable character of visual interest and ensuring that the scale and size of the buildings relate well to the existing area.
- 10.2.9 Policy **HN12** (Travelling Showpeople), Policy **HN11** (Gypsies and Travellers) and Policy **HN8** (Student Accommodation) recognises the importance of providing the appropriate level of accommodation and development sites to meet the needs of the varied population structure within Milton Keynes, as outlined within the ‘MK Strategic Housing Market Assessment 2017’.
- 10.2.10 Policy **ER11** (Assessing Edge of Centre and Out of Centre Proposals) states that proposals for main town centre uses outside of defined town centre areas will only be permitted where, amongst other things, ‘*the proposal would not have a significant adverse impact on the vitality and viability of the town centre*’.

Appraisal of the Proposed Submission Plan

- 10.2.11 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.

10.3 Deprivation

Reduce the gap between the most deprived areas of Milton Keynes and the average.

Commentary on the spatial strategy

- 10.3.1 The Index of Multiple Deprivation (2015) dataset shows a band over more deprived areas running through MK, from north to south, with Bletchley and Wolverton being two established regeneration priority areas at either end of this 'band'. However, neither the SE MK or East of M1 strategic urban extensions (see discussion of the proposals at this site above, under 'communities') would have a direct bearing on these areas.
- 10.3.2 Affordable housing provision is another important consideration, with a bearing on achievement of this objective. Both of the proposed strategic urban extensions would be expected to deliver a good proportion of affordable housing, in accordance with policy. It is also notable that housing at these sites could (in the case of SE MK) or would (in the case of East of M1) continue to deliver housing, and therefore affordable housing, beyond the plan period. However, there are significant uncertainties regarding delivery at both sites (see discussion above, under 'communities'). There is a need to increase affordable housing delivery in the early part of the plan period, as far as possible. See further discussion of the housing supply 'trajectory' below, under 'Housing'.
- 10.3.3 A notable strategic policy, with positive implications for 'deprivation' objectives, is Policy SD19 (Central Bletchley Urban Design Framework). The Council is seeking to deliver transformational regeneration of Central Bletchley over the plan period in conjunction with the proposed delivery of East-West Rail (EWR) services. A significant opportunity for Central Bletchley relates to increasing the density of housing in the area that will in turn increase economic activity and the diversification of retailing opportunities. The policy establishes principles including -
- *"The density of residential development to be 150-250 dwellings per hectare."*
 - *"Exploring options for the early redevelopment of the Police and Fire Station sites."*
 - *"Development should not preclude the delivery of an 'eastern entrance' to Bletchley railway station."*

Commentary on other policies

- 10.3.4 Policy **EH7** (Promoting Healthy Communities) highlights the Council's commitment to *'reducing health inequalities, increasing life expectancy and improving the quality of life of the borough'*. The aspirations set out within the policy align to the key issues which are identified in the 2015-2018 Joint Health and Wellbeing Strategy for Milton Keynes and also align to a number of policies dealing with 'Health' and 'Communities'

- 10.3.5 Policy **CT9** (Digital Communication) highlights the Council's wish *'to see all premises on all new developments served by digital communication services that provide at least superfast broadband speeds'*. Notably, this policy recognises the important of facilitating digital infrastructure to enable residents to stay connected, vital for meeting the aspirations of a number of policies in Plan MK dealing with 'Health', 'Communities', 'Business', 'Economy' and 'Housing', as well as the Government's Digital Communications Infrastructure Strategy.

Appraisal of the Proposed Submission Plan

- 10.3.6 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.

10.4 Education

Improve education attainment and qualification levels so that everyone can find and stay in work

Commentary on the spatial strategy

- 10.4.1 The matter of delivering new schools - both primary and secondary - is discussed above, under the 'Communities' heading, with it noted that East of M1 strategic urban extension (delivery not certain at this stage) would deliver a secondary school, whilst there is no equivalent proposal for the SE MK strategic urban extension. Initial indications are that a new (relatively small) secondary school would be needed at SE MK, 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 & SD11).

Commentary on other policies

- 10.4.2 Policy **INF1** (Delivering Infrastructure) states that *'new development that generates a demand for infrastructure, facilities and resources will only be permitted if the necessary on and off-site infrastructure required to support and mitigate the impact of that development'* is delivered.
- 10.4.3 Policy SD11 (General Principles For Strategic Urban Extensions) - requires provision of *"the necessary social, grey and green infrastructure at the appropriate stage, rate and scale to support the proposed development, in accordance with an approved Infrastructure Delivery Plan. Strategic Urban Extensions will be expected to make a contribution proportionate to its scale and impact for the delivery of strategic infrastructure requirements identified in the Local Investment Plan."*
- 10.4.4 Policy **EH4** (Further and Higher Education Provision) outlines the intent to expand the universities within the borough, develop links between other research and development establishments and allocate a site for the provision of new educational infrastructure with student accommodation (supported by Policy **HN8**: Student Accommodation). The policy will positively address the key concerns within the 'MK Futures Commission Report', however it could go further to increase the attainment of students into higher education, perhaps through the implementation of a borough-wide STEM programme, for example.

- 10.4.5 Policy **EH1** (Provision of New Schools – Planning Considerations) and Policy **EH2** (Provision of New Schools – Site Size and Location) outline the support for development proposals which seek to ‘*upgrade or expand existing schools and promote the development of new schools in locations where additional provision is required*’ and ‘*serve the educational needs of a designated catchment area*’. The objectives outlined in these policies support the ‘Council’s School Place Planning: Forward View 2017-2018’ document by addressing the shortage of school place provisions in a number of areas across the Borough.
- 10.4.6 In order to future-proof the development of new strategic sites to ensure that new and existing schools will have sufficient capacity to meet the need arising from new development, Policy **EH3** (Reserve Sites to Enable Future School Expansion) states that the Council will reserve designated sites for a period of 10 years to meet the future requirements of the borough. By reserving and safeguarding sites, the policy potentially provides a suitable timeframe in which the needs can be regularly reviewed and considered.

Appraisal of the Proposed Submission Plan

- 10.4.7 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.

10.5 Health

Protect and improve residents’ health and reduce health inequalities

Commentary on the spatial strategy

- 10.5.1 The matter of delivering new community facilities is discussed above, under the ‘Communities’ heading, with it noted that East of M1 strategic urban extension (delivery not certain at this stage) would deliver health facilities, whilst there is no equivalent proposal for the SE MK strategic urban extension. It could well prove possible and appropriate to deliver a health facility as part of the SE MK strategic urban extension; however, any decision to deliver a new facility would need to be made in consultation with the Milton Keynes Clinical Commissioning Group (CCG).
- 10.5.2 Matters of access to open space - which have been discussed above, including under the ‘Communities’ heading, are also of relevance, as access to open space is an important determinant of health. In this respect, the proposal to follow a restrained approach to growth within the MK urban area is broadly supported. The number of new homes supported at sites allocated within the existing urban area of Milton Keynes has been reduced from 5,000 homes, at the Draft Plan:MK stage, to 2,900 (i.e. 2,900 within CMK plus 1,000 elsewhere) in light of the Strategic Housing Land Availability Assessment. The current proposed strategy avoids allocation of open spaces, even where there is evidence to suggest that they are underused, with one exception. Specifically, Milton Keynes Rugby Club, Greenleys is allocated for the reason that development will enable improvements to the existing community facilities on-site (see further discussion above, under ‘Communities’).
- 10.5.3 Policy SD1 (Place-Making Principles for Development) - establishes a range of principles with positive ‘health’ implications, including:
- “*Development promotes good physical and mental health, with places and routes that are safe and perceived to be safe by creating passive surveillance and active frontages.*”

- *“The layout and design of development enables easy, safe and pleasant access for pedestrians and cyclists of all abilities from residential neighbourhoods to the facilities including the redway network, open spaces and play areas, linear parks and the wider network of green infrastructure, public transport nodes, employment areas, schools, and other public facilities in order to promote recreation, walking and cycling within the development area and wider area.”*
- *“Routes through the development cater for the needs of all age groups, in particular the elderly, through the provision of benches, shading and simple and clear signage. Opportunities for community cohesion should be maximised through the creation of permeable environments in new developments that will encourage people to get outdoors for recreation, social interaction, and moving around by non-vehicular means.”*

Commentary on other policies

- 10.5.4 Policy **L4** (Public Open Space Provision in New Estates) highlights the requirement for new housing development to *‘provide new or contribute to improved open space and recreational facilities’* which *‘support the delivery of a linked network of multi-functional, resilient and sustainable green infrastructure’*. Notably, the policy will positively contribute towards the community vitality of the borough and supports a number of other policies within Plan MK dealing with ‘Biodiversity’, ‘Community’ and ‘Services and Facilities’.
- 10.5.5 Policy **CT2** (Movement and Access) and Policy **CT3** (Walking and Cycling) address the need to reduce the dependency on private vehicles and contribute towards healthy outcomes for the city environment, recognised as a key priority area in the 2015-2018 Joint Health and Wellbeing Strategy for Milton Keynes. Notably, these policies are vital for achieving the aspirations of a number of policies relating to ‘Transport’ within Plan MK. Additionally, Policy **CT4** (Crossover on Redways) supports these policies by stating that new development proposals should aim to protect and enhance the network of shared use paths for cyclists and pedestrians (the ‘redways’) within Milton Keynes.

Appraisal of the Proposed Submission Plan

- 10.5.6 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.

10.6 Housing

Ensure that everyone has the opportunity to live in an affordable, sustainably constructed home

Commentary on the spatial strategy

- 10.6.1 The proposed approach to housing growth is introduced above, under the ‘Communities’ heading, with it noted that there is considerable uncertainty regarding the number of homes to be delivered, but good confidence in the ability to deliver at least the OAHN figure (26,500 homes over the plan period).

- 10.6.2 Furthermore, as explained, there could be the potential to deliver 'above OAHN'. None of MK's neighbouring authorities have requested that Milton Keynes provide for unmet needs (the typical reason for providing for 'above OAHN', e.g. this is the reason why the Vale of Aylesbury and Central Beds Local Plans are proposing to provide for above OAHN); however, providing for above OAHN could have merit nonetheless. Specifically, there is an argument for providing for 'above OAHN' in order to ensure that the need for affordable housing is met. The SHMA identifies a need for 8,200 affordable homes, not taking account of any losses from the current stock (e.g. sales through Right to Buy). Were Plan MK to provide for the 26,500 home OAHN figure, then 31% of homes delivered would need to be affordable; however, there are concerns regarding the ability to achieve this, given viability issues. Of the 1,247 completions in the 2016/2017 monitoring year, only 20.1% were affordable; and the 16,734 permissions are set to deliver only 27.7%. The implication is that there could be a need to provide for 'above OAHN' in order to meet the 8,200 affordable homes requirement. Much depends on the findings of detailed viability work to examine the financial burdens placed on house-builders, including the need to provide for other types of housing (Starter Homes, Build to Rent, Self-build) and planning obligations that impact the ability to provide for affordable housing.
- 10.6.3 A second, equally important consideration is the need to provide for a good mix of housing sites, recognising the need to ensure not only the delivery of 26,500 homes within the plan period, but also a steady 'trajectory' of housing delivery across the entire plan period (such that there is a rolling 'five year housing land supply'). Linked to this, there is a need to support smaller housing sites that are in turn suited to development by small/medium sized housebuilders, as this diversity can add resilience and in turn help to prevent unforeseen dips in the housing trajectory, and to provide more of the affordable housing requirement in the earlier part of the plan period. This being the case, there is merit in the proposal to support both strategic urban extensions (as opposed to just one), although the proposal to follow a restrained approach to growth in the urban area is perhaps more questionable.
- 10.6.4 Finally, there is a need to consider provision for the accommodation needs of Gypsy and Traveller communities. In this respect, it is noted that Policy SD13 (South East Milton Keynes Strategic Urban Extension) states: *"A site to accommodate 7 pitches for Gypsies and Travellers shall be provided as part of this development."* As discussed above, this site is associated with some delivery uncertainties; however, it may be that the Gypsy and Traveller site can be delivered as part of an early phase of development, potentially even ahead of a new Expressway being delivered through the site (were it to be the case that the selected Expressway route passes through the site). It is **recommended** that the Council provide clarity on this point.

[Commentary on other policies](#)

- 10.6.5 All of the policies within the 'Strategic Site Allocations' section of Plan MK seek to deal with relevant matters relating to the housing. Perhaps most notable is Policy **SD1** (Place Making Principles for Development), outlining 18 principles which proposals for new strategic urban extensions to Milton Keynes must adhere to. Notably, the policy seeks to address a number of matters within the 'MK Futures 2050 Commission Report' through the implementation of this holistic approach to place-making. Additionally, Policy **SD11** (General Principles for Strategic Urban Extensions), Policy **SD12** (Delivery of Strategic Urban Extensions) and Policy **SD17** (Place-Making Principles for Sustainable Urban Extensions in Adjacent Local Authorities) outline a variety of requirements which ensure that any proposals for strategic urban extensions contribute positively to Milton Keynes and support the development strategy for the borough, complementing to the delivery of a number of policies in Plan MK relating to 'Community', 'Services and Facilities', 'Economy' and 'Employment'.

- 10.6.6 Policy **DS2** (Housing) states that *'Plan MK will deliver a minimum of 29,000 dwellings across the borough of Milton Keynes over the period 2016-2031. New housing development will be focused on, and adjacent to, the existing urban areas of Milton Keynes, and will be delivered by (amongst other things) the completion of existing city estates, expansion areas and strategic land allocations'* (as outlined in Policies **SD2-17**). Notably, the housing strategy for the borough links to Policy **SD1** (Place Making Principles for Development) and Policy **MK1** (Presumption in Favour of Sustainable Development), ultimately aiming to positively contribute to economic, environmental and social progress.
- 10.6.7 Policy **D5** (Granny Annexes) states that *proposals for granny annexes will be permitted where the extension to an existing dwelling is modest in size and subordinate in scale to the main dwelling*. This policy also has the potential to deliver positive impacts to local residents, by allowing them to adapt their homes to fit their living requirements and/or to support the needs of any dependent relatives that they may have.
- 10.6.8 Policy **HN1** (Housing Mix and Density) and Policy **HN2** (Affordable Housing) states that development proposals for 11 or more new dwellings will be expected to *'provide a mix of tenure, type and size of dwellings that reflects the Council's latest evidence of housing need and market demand'* and *'provide 31% of those homes as affordable housing'*. The affordable housing target has been reduced from 33% to 31% as a result of the findings of the whole-plan viability assessment.
- 10.6.9 Policy **HN3** (Supported and Specialist Housing) states that *'residential development proposals will be expected to provide an element of supported or specialist housing too help contribute toward meeting the needs of older persons and households with specific needs'*. Notably, the policy recognises the importance of being able to adapt dwellings to accommodate different lifestyles and requirements, and will positively benefit the 14% of Milton Keynes who reported a long term health problem or disability in the 2011 census. Furthermore, Policy **HN4** (Amenity, Accessibility and Adaptability of Homes) supports this policy.
- 10.6.10 Policy **HN5** (Self-Build and Custom Housebuilding) states that the Council will *'strongly support proposals for self-build and custom housebuilding that involve the creation of low-cost and affordable housing'*. Additionally, Policy **HN9** (Loss and Conversion of Existing Residential Properties) aims to safeguard dwellings from demolition unless, amongst other things, *'it can be demonstrated that the existing dwelling is significantly affected by adverse environmental conditions'* or *'the social, economic or environmental benefits of doing so are demonstrated to significantly outweigh the need to minimise net losses to the Borough's housing stock'*. Notably, both of these policies aim to increase and protect housing and therefore positively contribute to the potential for Plan MK to deliver the minimum requirement of 29,000 dwellings between 2016-2031.
- 10.6.11 Policy **HN7** (Houses in Multiple Occupation) states that *'to maintain mixed, balanced, sustainable and inclusive communities, houses in multiple occupation will be approved where they would not create an over concentration of such accommodation resulting in a significant imbalance within local communities'*. Notably, the demand for such accommodation is evident from the 2011 census, with 12,840 students living in Milton Keynes (approximately 8% of the population) with access to a limited number of halls of residence. As such, this policy aims to sustainably manage the growth in the number of houses in multiple occupation in order to meet the demands of the local community, further supporting policies relating to 'Education'.
- 10.6.12 Policy **HN10** (Rural Exception Sites) states that proposals for small-scale 'affordable' housing schemes to meet local rural needs should only be approved on exception sites if *'there is a demonstrable social or economic need for affordable housing for local residents which cannot be met in any other way and which can reasonably be expected to persist in the long term'*. Notably, this policy seeks to protect the significant part of the borough which is rural in nature, and keeping larger scale developments away from these areas. Policies relating to 'Landscape', 'Biodiversity' and 'Community' also support this development principle.

Appraisal of the Proposed Submission Plan

- 10.6.13 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, the plan is predicted to result in **significant positive effects**.

10.7 Services and facilities

Ensure all sections of the community have good access to services and facilities

Commentary on the spatial strategy

- 10.7.1 The matter of delivering new community facilities is discussed above, under the 'Communities' heading, with it noted in particular that: East of M1 strategic urban extension (delivery not certain at this stage) would be required to deliver a range of facilities; and a comprehensive South East MK strategic urban extension (i.e. a scheme extending both sides of the railway, within the plan period) would also be expected to be masterplanned holistically, with provision made for a good range of facilities.
- 10.7.2 Policy SD1 (Place-Making Principles for Development) - establishes a range of principles with positive 'services and facilities' implications, including: *"New social and commercial facilities and services are provided, and existing facilities improved where possible, to meet the day to day needs of new and existing residents, including schools, shop, health care, and opportunities for employment."*

Commentary on other policies

- 10.7.3 Policy **L2** (Protecting of Open Space and Existing Facilities) states that planning permission will be refused for any development proposal which results in the loss of open spaces used for leisure and recreational purposes, unless *'an assessment has been undertaken which has clearly shown that the open space or leisure and recreational facilities to be surplus to requirements' or 'the loss of open space resulting from the development would be replaced by equivalent or better provision' or 'the development will significantly enhance the open space network as a whole'*. Notably, the policy recognises the benefits that these spaces and facilities have to local residents, enhancing the community vitality. The adaptable approach taken will also take into account changes to sporting and community trends and behaviours, and aligns to Policy **L3** (Change of Use Amenity Open Space).
- 10.7.4 Policy **INF1** (Delivering Infrastructure) states that *'new development that generates a demand for infrastructure, facilities and resources will only be permitted if the necessary on and off-site infrastructure required to support and mitigate the impact of that development'* is delivered. Notably, a range of other policies related to 'Housing' and 'Community' support this objective, in order to ensure that the needs and requirements of the borough are met.
- 10.7.5 Policy **EH5** (Health Facilities) states that *'proposals for new facilities will be permitted where they will meet an identified local need'* and that *'the Council will work positively with local communities and support proposals to retain, improve or re-use essential facilities and services'*. Notably, this policy outlines a sustainable approach to the health infrastructure within the borough, recognising the importance of community consultation prior to development. Policy **EH6** (Delivery of Health Facilities in New Development) complements this policy by recognising the need to undertake Health Impact Assessments for larger developments which will *'measure the wider impact upon healthy living and the demands which are placed upon the capacity of health services and facilities arising from the development'*.

- 10.7.6 Policy **CC4** (Childcare Facilities) states that *planning permission will be granted for crèche, nursery and similar childcare facilities if they are consistent with the detailed policy guidance in Appendix CC4 of Plan MK.*
- 10.7.7 Policy **CC5** (New Community Facilities) outlines the support for development proposals which (amongst other things) *retain and maintain existing facilities valued by the community and improve the quality and capacity of facilities valued by the community.* The policy recognises the need for proposed developments to contribute to the provision of facilities *in a way that is not only proportionate to the scale of proposed development, but also enables usage by residents from across Milton Keynes.* Notably, the policy states that the types of activity, the hours of operation and the numbers of attendees will be regulated in order to maintain the amenity of the surrounding area.
- 10.7.8 Policy **CC3** (Protection of Community Facilities) highlights that *proposals that involve the loss of an existing community facility or the loss of a site allocated for such a purpose will only be supported where there is no longer a need for the facility for any type of community use, and this has been robustly evidenced by research and consultation.*
- 10.7.9 Policy **CC2** (Location of Community Facilities) outlines the preference for residential community facilities to be located in areas which are *well related to local centres.* Planning permission for non-residential community facilities within, or adjacent to Central Milton Keynes, town, district and local centres will be reviewed, prior to approval.
- 10.7.10 Policy **D6** (Mains and Telecommunications Services) states that any *electricity and telecommunications and broadband services to new developments within the boundary of Milton Keynes City should be provided underground.* The policy will maintain the visual amenity of city and minimise the potential negative landscape impacts associated with these services, which traditionally are located 'above ground'.

Appraisal of the Proposed Submission Plan

- 10.7.11 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.

10.8 Air quality

Maintain and improve the air quality in the borough

Commentary on the spatial strategy

- 10.8.1 There are no designated Air Quality Management Areas (AQMAs) within the Milton Keynes urban area. The only AQMA is within Olney, due to the amount of traffic (including significant numbers of HGVs) which travel through the centre of Olney. However, 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 an AQMA might need to be designated). 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). See further discussion below, under 'Transportation'.

Commentary on other policies

- 10.8.2 Policy **NE6** (Environmental Pollution) states that when considering development proposals, the Council will adopt an approach *‘to ensure that pollution will not have an unacceptable impact on human health, general amenity, biodiversity, or the wider natural environment’*. Specifically, section ‘B’ of the policy outlines a number of provisions relating to air quality, with the *‘potential impacts upon air quality arising from airborne emissions, dust and odour associated with the construction and operation of a proposal’* considered when determining planning applications. As of 2017, the only AQMA within the borough is located in Olney, principally due to traffic emissions along the A509 through the town. Policy NE6 also states the requirement for proposals to include an ‘Air Quality Assessment’ if the development is within an AQMA or within 50 metres of a major road or heavily trafficked route. As such, the policy positively contributes to the protection of air quality within the borough.

Appraisal of the Proposed Submission Plan

- 10.8.3 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.

10.9 Biodiversity

Conserve and enhance the borough’s

Commentary on the spatial strategy

- 10.9.1 None of the proposed strategic urban extension sites could be described as highly constrained in biodiversity terms, although there are some issues, including -
- South East MK – the site is in close proximity to the extensive woodlands associated with the Greensand Ridge, much of which is ancient woodland designated as a Local Wildlife Site (LWS); however, it is not clear that this is necessarily a significant constraint. Residents would benefit from ‘access to nature’ (there are footpath links), and the woodlands are not known to be particularly sensitive to increased recreational pressure.
 - East of the M1 – the River Ouzel passes north/south through the site, which is associated with some mature trees and other riparian habitat. It forms part of the MK green infrastructure network (although it is noted that there is no footpath along the river).
- 10.9.2 The following strategic development policies have positive implications for biodiversity -
- Policy SD1 (Place-Making Principles for Development) - states that: “Development should result in a net gain in biodiversity.” It is **recommended** that this be qualified further, with reference to the scale at which the increase in biodiversity should be achieved at, or with reference to “net gains in biodiversity, in accordance with established strategic biodiversity aims and objectives”.
 - Policy SD11 (General Principles For Strategic Urban Extensions) - requires: “A *landscape and open space strategy to improve biodiversity, provide advance structural planting, extend the “forest city” concept, create green road and street scenes, and incorporate public art and leisure and recreation facilities.*”

- Policy SD16 (Strategic Employment Allocation, Land South of Milton Keynes, South Caldecotte) states: *“A green open space link will be created on the site, linking into Caldecotte Lake to the north and providing future opportunity to link the park to the south/east. The open space link should include access and connectivity to Caldecotte Lake with mechanisms in place for its sustainable management over the long term and balancing ponds as part of a Sustainable Urban Drainage system across the site.”*
- Policy SD17 (Place-Making Principles for Sustainable Urban Extensions in Adjacent Local Authorities) states that: *“Linear parks should be extended into the development where possible to provide recreational, walking and cycling links within the development area and to the city’s extensive green infrastructure and redway network.”*

Commentary on other policies

- 10.9.3 Policy **NE4** (Green Infrastructure) highlights the requirement for development proposals to provide new, or contribute to existing green infrastructure. Notably, the policy states that proposals will seek to ensure that *‘existing ecological networks are identified and wherever possible maintained to avoid habitat fragmentation , and that ecological corridors, including water courses, form an essential component of their green infrastructure provision to support habitat connectivity’*. The policy will positively contribute to the delivery of the nine principles outlined in the Natural Environment Partnership’s ‘Vision for Green Infrastructure in Buckinghamshire’, in addition to directly linking with policies dealing with ‘Climate Change’ and ‘Air Quality’ within the Local Plan.
- 10.9.4 Policy **NE2** (Protected Species and Priority Species and Habitats) states that *‘when there is a reasonable likelihood of the presence of statutorily protected species or their habitats...development will not be permitted until it has been demonstrated that the proposed development will not result in a negative impact upon these species and habitats’*. Notably, along with Policy **NE3** (Biodiversity and Geological Enhancement), this policy will positively contribute towards the protection and enhancement of the ecological networks within the borough. There is the potential to enhance the policy by specifying that the ‘qualifying features’ (i.e. the species or habitats which are the principal reasons for the designation of protected sites), will not be negatively impacted by any development proposals.
- 10.9.5 Policy **NE1** (Protection of Sites) outlines that development proposals will not be permitted if they would likely harm the nature conservation or geological interest of international, national and locally protected sites. The policy states that development should not be permitted if it would result in any harm to the assets, but also states that development proposals which would impact nationally and locally designated sites will be permitted if *‘there is no suitable alternative to development’*. Although, this might result in negative effects to biodiversity, the additional provisions in the policy will seek to offset these negatives by ensuring that development proposals secure *‘compensatory provision...that will mitigate damaging impacts on the biodiversity or geological conservation value of the site’*.

Appraisal of the Proposed Submission Plan

- 10.9.6 Proposed development sites are relatively unconstrained, and a very 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.

10.10 Climate change

Combat climate change by reducing levels of carbon dioxide

Commentary on the spatial strategy

- 10.10.1 There is a need to minimise per capita CO₂ emissions from transport, and the built environment. In respect of the former, this is a focus of discussion below, under 'Transportation'. In respect of the latter, a key consideration is the need to support larger developments – in excess of 500 homes – where there will be the economies of scale that make delivery of decentralised heat and power generation a possibility. Policy CS14 (Community Energy Networks and Large Scale Renewable Energy Schemes) of the adopted Core Strategy states: *"Proposals for over 100 homes will be encouraged to consider the use of community energy networks in their development."* However, in practice viability considerations can be prohibitive, recognising the need to fund/deliver affordable housing and a range of other costly infrastructure (e.g. roads and schools). Neither of the Expansion Areas are delivering an energy network, and whilst Policy CS5 (Strategic Land Allocation, SLA) of the Core Strategy, which allocated the SLA, established policy - *"Consider the use of community energy networks"* – in practice the entire site now has outline planning permission, with no energy network(s) having been proposed. This being the case, there is only likely to be an opportunity to deliver low carbon heat or electricity as part of the East of M1 scheme, delivery of which is currently uncertain (see discussion above, under 'Communities').
- 10.10.2 It is noted that MK Community Energy Alliance responded to the Draft Plan:MK consultation, suggesting that the plan *"lacks ambition in terms of addressing climate change issues and supporting community energy."* The Alliance suggest: *"There needs to be strong grounds for not having community energy as standard within any new development."*

Commentary on other policies

- 10.10.3 Policy **SC4** (Low Carbon and Renewable Energy Generation) states that *the Council will encourage proposals for low carbon and renewable energy generation developments that are led by, or meet the needs of local communities.* Notably, planning permission will only be granted for developments which do not cause, (amongst other things), *significant harm to the amenity of the residential area, significant harm to wildlife species or habitat, unacceptable landscape and visual impact on the landscape, unacceptable harm to the setting of the heritage assets and unacceptable impact on air safety.*
- 10.10.4 Policy **SC3** (Community Energy Networks and Large Scale Renewable Energy Schemes) highlights that *low carbon and renewable energy schemes will be attributed significant weight in their favour, and will be supported where it can be demonstrated that there will not be any significant negative social, economic and environmental impacts associated with them.* Notably, all planning proposals for over 100 homes and proposals for non-residential developments of over 1,000m² *will be expected to consider the integration of community energy networks in the development.*
- 10.10.5 Policy **SC1** (Sustainable Construction) outlines how development proposals will need to *demonstrate how they have implemented the principles and requirements* relating to energy and climate (amongst other things). For example, by prioritising *the use of materials and construction techniques that have smaller and ecological and carbon footprints* and incorporating *green roofs and/or walls into the structure of buildings where technically feasible to...aid resilience and adaptation to climate change.* Notably, the policy highlights that all non-residential developments of over 1000m² will not be required to demonstrate the principles and requirements providing it will achieve a BREAM outstanding rating. This links to Policy **NE4** (Green Infrastructure).

- 10.10.6 Policy **CT6** (Low Emissions Vehicles) states that the Council will ‘*maximise the use of sustainable transport in developments, and support low carbon public and personal transport such as electric cars and buses*’. The Council will also ‘*require new facilities for low emissions vehicles to be integrated into new major development schemes where local centres are proposed*’. Notably, this policy positively contributes towards the ‘Local Carbon Living Strategy’ for Milton Keynes, which sets a target for reducing emissions per person in the borough by 40% by 2020. The policy also links to a number of policies relating to ‘Transport’ and ‘Communities’ within Plan MK.

Appraisal of the Proposed Submission Plan

- 10.10.7 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.

10.11 Cultural heritage

Conserve and enhance the borough’s heritage and cultural assets

Commentary on the spatial strategy

- 10.11.1 None of the urban extension sites in question could be described as highly constrained in heritage terms. An East of M1 scheme could encroach upon Moulsoe, which is a small village associated with a cluster of listed buildings (but no conservation area), and would also include one listed building; however, given the amount of land area available, there can be confidence in the ability to mitigate heritage impacts through masterplanning.
- 10.11.2 The proposal to follow a relatively restrained approach to growth within the MK urban area, avoiding development of existing areas of open space, is also supported. There is some uncertainty regarding the heritage value of small areas of open space, ahead of the completion of current work to examine green infrastructure at the Milton Keynes scale; however, it could be the case that close examination finds some small open spaces to be integral to the original MK masterplan.
- 10.11.3 Also of note is the proposal to deliver a significant number of new homes (1,900) within CMK, including Campbell Park, with a view to supporting increases the vibrancy within CMK, including the night time economy. Furthermore, Policy DS4 (Retail and Leisure Development Strategy) states that: “In CMK... Milton Keynes Council will... Work with major investors and stakeholders in CMK to promote a CMK Renaissance.” The supporting text explains that: “*Central Milton Keynes Renaissance [The CMK Alliance Business Neighbourhood Plan] celebrates CMK’s distinctive design, architecture and heritage and highlights that there are almost 50 hectares of land yet to be developed within CMK. It recognised the need to expand and diversify the CMK retail offer, to promote new office developments, to make provision for a new university for Milton Keynes, to develop new city centre dwellings, and enrich the city’s social, sporting and cultural life with new facilities.*”

Commentary on other policies

- 10.11.4 Policy **HE2** (Heritage and Development) recognised the importance of protecting the diversity of heritage assets within the borough, including those of historic, archaeological, architectural, artistic, landscape or townscape significance. The policy states that development proposals will be supported if they ‘*sustain and, where possible, enhance the significance of the heritage assets*’, which positively supports the ‘Strategy for the conservation and enjoyment of the Historic Environment’, outlined within Plan MK.

Appraisal of the Proposed Submission Plan

- 10.11.5 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.

10.12 Landscape

Conserve and enhance the borough's landscape assets

Commentary on the spatial strategy

- 10.12.1 None of the proposed extension sites in question could be described as highly constrained in landscape terms. South East MK has 'low' sensitivity, according to the Landscape Capacity Study (2016), and whilst the study does not examine all of the East of M1 site, the general view is that the landscape in this area is relatively non-sensitive. As for the proposed South of Caldecotte strategic employment site, the Landscape Sensitivity Study identifies this site as falling within a parcel of land with 'medium' sensitivity; however, this conclusion may relate more to land to the south (Eaton Leys, which is now a committed housing site), rather than to the Caldecotte South site. The study explains that: *"Residential development could not be accommodated without affecting key characteristics and/or values in the landscape. The area suffers from visual and auditory intrusion from the transport network."*
- 10.12.2 Also of note is the proposal to deliver a significant number of new homes (1,900) within CMK, including Campbell Park. Located at the centre of Milton Keynes, the park area of Campbell Park has a mix of formal gardens, water features, woodland and open pasture. It is the largest park within the city centre, and there is the potential to encourage more people to visit the park, where opportunities arise. Policy SD2 (Central Milton Keynes - Role and Function) states that: *"The role of Campbell Park as the city centre park will be maintained and links to the park will be improved, where opportunities arise. The impact of development proposals on the setting of the Park will be considered in the determination of planning applications for those proposals."*
- 10.12.3 Finally, Policy SD13 (South East Milton Keynes Strategic Urban Extension) is notable for stating: *"The urban extension will respect and reinforce the distinct character of the surrounding settlements of Wavendon, Woburn Sands and Bow Brickhill through providing new or reinforced green buffers, thereby protecting existing settlement character."*

Commentary on other policies

- 10.12.4 Policy **D2** (Creating a Positive Character) contains objectives which focus on the sense of place and distinctive character of the area. Specifically, the policy states that development proposals will be permitted if, amongst other things, the *'character of the development is locally inspired where appropriate and the design allows for visual interest through the careful use of detailing'*. The policy aligns with Policy **D1** (Designing a High Quality Space), which outlines specific objectives and principles for new development which seek to enhance the 'sense of place' and character of the borough.
- 10.12.5 Policy **NE5** (Conserving and Enhancing Landscape Character) outlines the requirement for development proposals to demonstrate that the wealth of aspects which contribute to landscape character will be *'conserved and where possible enhanced through sensitive design, landscape mitigation and enhancement features'*, and therefore positively contributes towards maintaining the 'sense of place' and community vitality of the borough.

- 10.12.6 Policy **DS5** (Open Countryside) states that *'planning permission within the open countryside will only be granted which is essential for agriculture, forestry, countryside recreation or other development, which is wholly appropriate to a rural areas and cannot be located within a settlement'*. Notably, the policy seeks to protect the open countryside around Milton Keynes which provides a distinct and intrinsic character for local residents, indirectly contributing to their health and wellbeing and supporting other policies within Plan MK relating to 'Biodiversity', 'Community' and 'Health'.

Appraisal of the Proposed Submission Plan

- 10.12.7 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.

10.13 Natural resources

Encourage efficient use of natural resources (including land/soils)

Commentary on the spatial strategy

- 10.13.1 A significant consideration is the need to take into account the economic and other benefits of 'best and most versatile' (BMV) agricultural land, which the NPPF defines as that which is classified as either grade 1, grade 2 or grade 3a, according to the national agricultural land classification.
- 10.13.2 The 'Agricultural Land Classification Provisional (England)' dataset, available at magic.gov.uk, shows the majority of agricultural land around the edge of MK to be 'grade 3'. However, this data-set is of a very low resolution (e.g. not all of MK is recognised as being 'urban' on the map), and hence is not suitable for differentiating sites. Also, the dataset does not distinguish between 'grade 3a' and 'grade 3b'.
- 10.13.3 The most reliable dataset is the 'Post 1988 Agricultural Land Classification (England) dataset, also available at magic.gov.uk, which is suitable for differentiating site options, and does distinguish between grade 3a and grade 3. However, because surveying land using the 'post 1988' criteria involves fieldwork, the data is very patchy. Findings are -
- South East of MK comprises mostly BMV land (including some grade 2);
 - Caldecotte South has been surveyed and found to comprise non BMV (grade 4) land
 - Land adjacent to the East of M1 site has been surveyed, with some evidence of BMV.

Commentary on other policies

- 10.13.4 No policies deal specifically with the matter of agricultural land, which is understandable given that it is not really possible to mitigate for the loss of agricultural land.

Appraisal of the Proposed Submission Plan

- 10.13.5 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**.

10.14 Noise pollution

Limit noise pollution

Commentary on the spatial strategy

- 10.14.1 It is fair to conclude that the proposed East of M1 strategic allocation could be constrained by noise pollution, albeit there will be good potential to avoid/mitigate effects, through bunds/barriers and also building design measures. The South East MK site could also be similarly constrained, if not more so, recognising the existing railway (along which the frequency of trains will increase significantly, over the course of the plan period), and the possibility of the Oxford to Cambridge Expressway passing through the site (N.B. this is highly uncertain).

Commentary on other policies

- 10.14.2 Policy **NE6** (Environmental Pollution) states that when considering development proposals, the Council will adopt an approach *'to ensure that pollution will not have an unacceptable impact on human health, general amenity, biodiversity, or the wider natural environment'*. Specifically, section 'C' of the policy states that a 'Noise and Vibration Impact Assessment' will be required if the development proposal would likely have a very disruptive, disruptive or intrusive adverse effects on *'human health or the natural environment or the tranquillity and enjoyment of the countryside'*.
- 10.14.3 Policy **L7** (Criteria for the Location of Noisy Sports and Recreational Facilities) states that planning permission for noisy sports will only be permitted if, amongst other things, *'the ambient noise level of the area is already high', 'it would not significantly increase the noise experienced at nearby noise sensitive development' or 'noise levels can be effectively reduced by siting and screening'*. Notably, the policy aims to minimise the disturbance caused by noisy sports by restricting their location to the most suitable sites within the borough.

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- 10.14.4 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.

10.15 Transport

Limit and reduce road congestion and encourage sustainable transportation

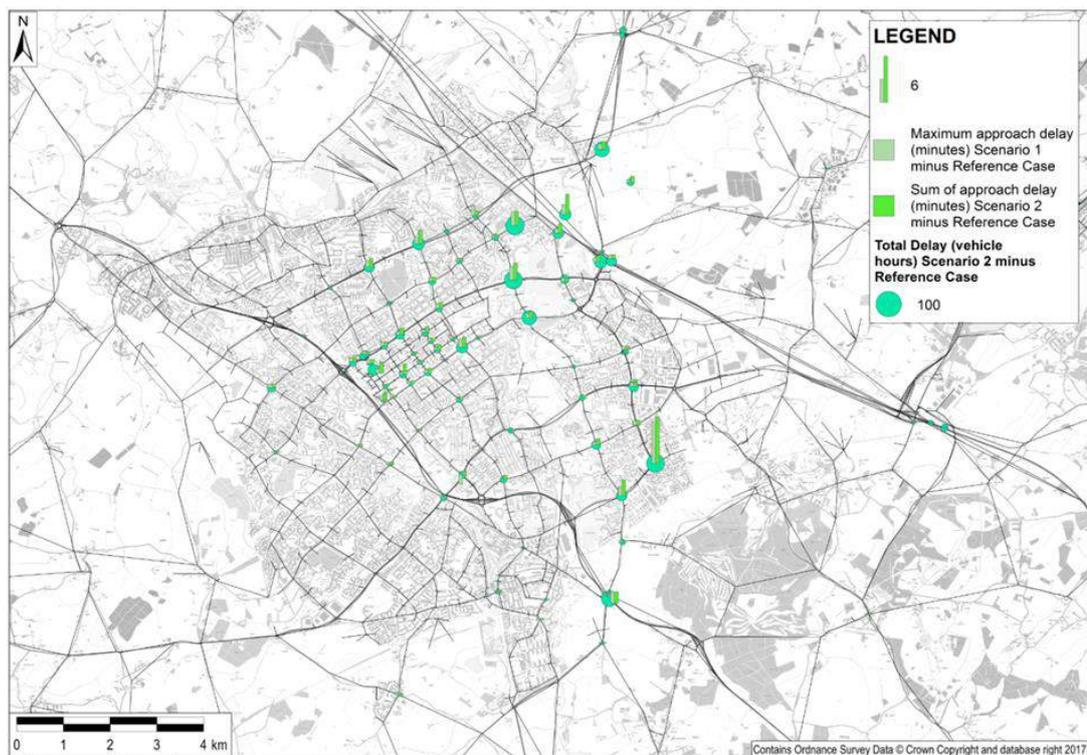
Commentary on the spatial strategy

- 10.15.1 Modelling work has been completed (AECOM, 2017) to examine the effect of Plan:MK housing growth on the traffic baseline in 2031 (recognising that the baseline, or 'reference case', will involve significant housing growth, given the commitments that are in place). Several scenarios are examined, reflecting the uncertainty that exists regarding delivery at South East MK and East of the M1, with Scenario 2b representing a worst case scenario, in that it would involve maximum growth at both urban extensions. The model assumes that key infrastructure would be delivered at each urban extension site – notably bridges over the railway and M1 respectively – but otherwise assumes nil mitigation, i.e. does not assume investment in offsite infrastructure upgrades over-and-above upgrades that are already committed. Notable conclusions are –

- South East MK – the conclusions reached for Scenario 2a are of particular note, as this scenario involves maximum growth here (relative to Scenario 1, which involves lower growth). The conclusion is reached that: *“Although there is significant extra housing growth, the impacts are mitigated by the new link between H10 and Bow Brickhill Road bridging the railway line just to the west of Woburn Sands, and the additional road network linking H10 through to A5130 (Newport Road).”* Another notable conclusion is that: *“Scenario 2a has little impact on Bow Brickhill level crossing, in terms of flow and delay with a maximum flow circa 900 PCU using the crossing which is within an acceptable volume for the crossing to accommodate given the train service frequency assumed.”*
- East of the M1 - the conclusions reached for Scenario 2b are of particular note, as this scenario involves maximum growth here (relative to other scenarios, which involve nil or lower growth). The conclusion is reached that: *“The new road bridge is predicted to take a significant volume of flow (1500-1700 PCU in the direction of peak tidal flow), which helps mitigate the impact of the East of M1 development. In the AM Peak there is still an increase in flow crossing J14 towards Milton Keynes of around 250 PCU, however the model is showing little impact in delay at J14, partly due to addition of the dual carriageway link on southbound approach alleviating a current pinch point.”*

10.15.2 A key output of the Transport Modelling work is presented in Figure 10.1. Specifically, the figure shows the delay that would result from Scenario 2 relative to the baseline ('reference case') in 2031. N.B. Scenario 2 assumes 3,000 homes East of the M1.

Figure 10.1: Change in junction delay at congestion hot spots



10.15.3 Focusing on the potential East of M1 scheme, it is noted that the proposed site specific policy requires: *“A corridor of land safeguarded for a fast mass-transit system connecting CMK and Cranfield University.”* The scale of the site should also mean excellent potential to deliver mixed communities, to include shops, services/facilities and employment, in addition to housing, leading to a degree of self-containment. However, in other respects it is fair to conclude that growth to the East of the M1 is less than ideal, from a perspective of wishing to minimise car dependency / distance travelled by car, and also minimise traffic congestion. The site would be some distance from CMK, with clear barriers to movement (the M1).

- 10.15.4 Relative to East of M1, South East MK and South of Caldecotte are more accessible locations, including on the basis of proximity to existing train stations at Bow Brickhill and Woburn Sands Supporting text relating to the South East MK site explains that: *“Due to the close relationship between this development area and the East-West Rail line, the Council will work with developers and infrastructure providers to prepare a development framework which maximises the opportunities for sustainable travel. The principal vehicular access to the site should be sought via an extended H10 Grid Road that is delivered ahead of occupation of new housing within the site.”*
- 10.15.5 Policy SD1 (Place-Making Principles for Development) - establishes a range of principles with positive ‘Transport’ implications, including:
- *“The layout and design of development enables easy, safe and pleasant access for pedestrians and cyclists of all abilities from residential neighbourhoods to the facilities including the redway network, open spaces and play areas, linear parks and the wider network of green infrastructure, public transport nodes, employment areas, schools, shops and other public facilities in order to promote recreation, walking and cycling within the development area and wider area.”*
 - *“Transport solutions maximise the opportunities provided by smart, shared and sustainable mobility solutions to deliver real alternatives to the private car (e.g. connectivity with existing and forthcoming rail services; rapid transit; driverless vehicles; shared vehicle schemes; coaches and buses).”*
 - *“To maximise their sustainability, rapid public transport solutions proposed as part of new urban extensions connect into Central Milton Keynes.”*
 - *“New ‘Park and Ride’ or Parkway sites which provide an alternative to the car for journeys into Milton Keynes and beyond should be provided where appropriate.”*
- 10.15.6 Policy SD4 (Central Milton Keynes – Connectivity) is also of note. The policy supports: *“Measures to improve accessibility to and within Central Milton Keynes... including: Smart, shared, sustainable mobility; An enhanced and high quality network of pedestrian/cycle routes public open spaces and squares; Improvements to and prioritisation of pedestrian and cycle accessibility; and Integration of public transport.”* Making the city centre accessible by a variety of means has a number of benefits; increased walking and cycling will encourage more active and healthy lifestyles and greater use of CMK’s network of pedestrian/cycle routes and public spaces. Smart shared sustainable mobility was one of the six big projects identified by the MK Futures 2050 Commission.
- 10.15.7 Finally, it is noted that -
- Policy SD14 (Milton Keynes East) requires: *“A corridor of land safeguarded for a fast mass-transit system connecting CMK and Cranfield University.”*
 - Policy SD16 (Strategic Employment Allocation, Land South of Milton Keynes, South Caldecotte) requires: *“Direct footpath connections to Bow Brickhill railway station and the existing Public Right of Way running along the site’s northern boundary will be effectively integrated into the development.”*
 - Policy SD17 (Place-Making Principles for Sustainable Urban Extensions in Adjacent Local Authorities) states: *“The opportunity for new ‘Park and Ride’ sites for the city should be fully explored and where possible provided, and efficiently and effectively linked to the city road system.”*
- [Commentary on other policies](#)
- 10.15.8 Policy **CT1** (Sustainable Transport Network) outlines a number of objectives which the Council will promote in order to *‘promote a sustainable pattern of development in Milton Keynes, minimising the need to travel and reducing dependence on the private car’*. Notably, the policy supports the ‘Milton Keynes Transport Vision and Strategy LTP3 2011-2031’.

- 10.15.9 Policy **CT5** (Public Transport) positively contributes towards the strategy to promote sustainable transport patterns within Milton Keynes, stating that *'all development proposals must be designed to meet the needs of public transport operators and users'*. The policy could go further in terms of the promotion of public transport options in support of the 'Get Smarter Travel in MK Bid', perhaps by stating a requirement for all new developments to provide a transport welcome pack in each dwelling which details the range and availability of local public transport options.
- 10.15.10 Policy **CT8** (Grid Road Network) stating that the Council will *'conserve and enhance its iconic grid road system whilst safeguarding the corridors for possible mass transit schemes'*. Notably, new development proposals will need to ensure that the network is expanded and integrated into the design and layout in order to maintain its effective functionality, accommodate increasing travel demands and also ensure the quick vehicle movement of through traffic across the borough (linking with Policy **CT7**: Freight). Principally, the design of any new grid roads will be sustainable, aligning with the place making principles for development (Policy **SD7**).
- 10.15.11 Policy **CT10** (Parking Provision) outlines the requirements for development proposals to meet the parking standards for the borough, ensuring that they allow for the safe movement of traffic, pedestrians and cyclists, as well as reduce the visual and environmental impact of what are often large areas of unbroken asphalt.

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- 10.15.12 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.

10.16 Water and flood risk

Maintain and improve water quality and minimise the risk of flooding

Commentary on the spatial strategy

- 10.16.1 The East of M1 site is significantly constrained by the River Ouzel, which flows through the centre of the site. The representation received from the site promoter, through the Draft Plan MK consultation (2017) states: *"The development proposals do include new roads across the flood plain of the River Ouzel. Subject to appropriate design and mitigation these are acceptable uses within Flood Zones 2 and 3. With appropriate designs for clear spans, flood relief culverts and associated earthworks the roads would not impede flood flow or increase flood levels within the flood plain. On this basis the EA has previously confirmed that it has no objection in principle."*
- 10.16.2 Policy SD1 (Place-Making Principles for Development) requires that: "Development takes a strategic, integrated and sustainable approach to water resource management (including SUDS and flood risk mitigation)." However, there is no reference to flood risk in site specific policies. It is **recommended** that site specific policy for this site should reference the flood risk that exists.

- 10.16.3 The matter of ‘wastewater services’ is another ‘water’ issue of relevance to the spatial strategy. In particular, there is a need to direct growth to locations where there is capacity at Wastewater Treatment Works (WwTWs), or where there is confidence regarding the potential to generate capacity through upgrade works. A recent Water Cycle Study (2017) establishes that the MK urban area drains to the Cotton Valley WwTW, to the east, which has headroom capacity, but to a limited extent. The conclusion is reached that, in order to ensure that the use of available permitted headroom does not impact on downstream water quality objectives (ammonia, BOD and phosphate are key considerations), changes to the quality permit are required, and upgrades may be required, which may have phasing implications.

Commentary on other policies

- 10.16.4 Policy **FR1** (Managing Flood Risk) states that Plan MK will ‘*seek to steer all new development towards areas with the lowest probability of flooding. The sequential approach to development, as set out in national guidance, will therefore be applied across the borough, taking into account all sources of flooding as contained within the Council’s Strategic Flood Risk Assessment*’. Notably, the policy also states that all new development must incorporate a surface water drainage system, and is further supported by Policy **FR2** (Sustainable Drainage Systems and Integrated Flood Risk Management).
- 10.16.5 Policy **FR3** (Protecting and Enhancing Watercourses) outlines that all new developments must provide an adequate undeveloped bufferzone from any main rivers and ordinary watercourses. New development has the potential to interfere with existing drainage systems, decrease floodplain storage, reduce permeable surface areas and increase the volume and speed of runoff through a catchment, ultimately leading to dramatic changes to river catchment characteristics. Notably, the policy states that the Council will ‘*resist proposals that would adversely affect the natural functioning of the main rivers and ordinary watercourses*’, and positively seeks to prevent any negative interferences from development.
- 10.16.6 Policy **L6** (Criteria for the Location of Water Sports) states that planning permission for unpowered watersports will only be permitted if they do not ‘*have an unacceptable environmental impact*’ or ‘*are incompatible with any existing use of the water (including non-recreational use)*’. The policy could go further to perhaps include an additional condition to ensure that the watersports will not negatively impact upon water quality.
- 10.16.7 Policy **SC1** (Sustainable Construction) adopts the optional higher water efficiency standard within Building Regulations Part G for new dwellings, which means that: all newly constructed dwellings will be required to achieve an estimated water consumption of no more than 110 litres/person/day; and water reuse and recycling and rainwater harvesting should also be incorporated wherever feasible to reduce demand on mains water supply.

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- 10.16.8 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.

10.17 Waste

Reduce waste generation and encourage sustainable waste management

Commentary on the spatial strategy

- 10.17.1 This objective is not applicable to the current appraisal. It should be possible to manage waste sustainably under any reasonably foreseeable scenario. It is noted that the East of M1 site would benefit from being in proximity to a household waste recycling centre; however, this is not thought to have a significant bearing on the achievement of sustainable waste management objectives.

[Commentary on other policies](#)

10.17.2 Policy SC1 (Sustainable Construction) has provision relating to construction waste, and design measures to improve recycling of household waste.

[Appraisal of the Proposed Submission Plan](#)

10.17.3 The plan has very minor implications for waste management objectives.

10.18 Businesses, economy and employment

- Encourage the creation of new businesses
- Sustain economic growth and enhance competitiveness
- Ensure high and stable levels of employment

N.B. the three headings above are considered together, recognising that a key consideration is the potential to deliver new employment land alongside housing.

[Commentary on the spatial strategy](#)

10.18.1 The Council’s Employment Land Study (2017) considers requirements and then existing supply, in order to inform a decision on whether / how much employment land must be allocated through Plan MK in order to meet requirements. The table below summarises the requirements. One requirement is calculated by Experian and the other using the East of England Forecasting Model (EEFM).

Table 10.1: Employment Land Requirements in the Borough of Milton Keynes 2016-2031.

Category of Floorspace	Experian (ha)	EEFM (ha)
Office	17	18
Industrial	12	2
Warehouse	104	66
Total	132	87

10.18.2 As can be seen, the need for warehousing is considerably higher than the need for office space or industrial space. The need for office space and industrial space is met by the existing supply.

10.18.3 Focusing on warehousing, the existing supply totals 56.5 ha (Eagle Farm North, 35.8 ha; Pineham, 10.9 ha; and Glebe lands, 9.8 ha), which means that Plan MK must allocate between 9.5ha (66-56.5 ha) and 47.5 ha (104-56.5).

10.18.4 The proposed Caldecotte South site will provide 57 hectares, thereby meeting the exiting need, plus providing a suitable ‘buffer’. The site is not as well linked to the M1, but on a strategic transport corridor nonetheless, and indeed a transport corridor that is a national focus of growth (the Oxford to Cambridge Corridor).

10.18.5 The proposed East of M1 site would also deliver significant employment land, including warehousing, were it to come forward in the plan period. The site is accessible from the M1, and therefore an attractive location for warehousing.

10.18.6 Finally, there is a need to note the proposal to deliver a significant number of new homes (1,900) within CMK. There is notably a support for housing on land within Campbell Park, and new offices within the main CMK area, where as previously the proposal through the CMK Alliance Plan was more to support office development in this area.

[Commentary on other policies](#)

10.18.7 Policy **DS3** (Employment Development Strategy) outlines a strategy for supporting the economic needs of the borough through the continued development of Central Milton Keynes, retaining and developing existing employment sites and by allocating new employment land at appropriate locations to provide a flexible supply of sites to cater for future employment needs. Notably, the policy states that the Council will *'encourage training and skills development at all levels to enable local residents to access the job opportunities generated by employers'* in order to tackle the deficit of highly skilled workers within the borough and reduce the reliance on commuters to meet the demand for highly skilled workers.

10.18.8 Policy **DS4** (Retail and Leisure Development Strategy) states that over the time period of Plan MK, the Council will (amongst other things) aim to achieve the following

1. *'seek to grow and develop the Borough's retail, leisure, entertainment and cultural offer;*
2. *'develop the primary shopping area of Central Milton Keynes;*
3. *'promote and support town centre development;*
4. *'promote and support the tourism and visitor economy; and*
5. *'plan for the provision of new shops, services and facilities in areas of new residential development'*

Notably, the policy positively supports the development strategy for the borough through growing and developing the retail, leisure, entertainment and cultural offer to cater for the growing population of the borough, and make the city an attractive location for businesses. Additionally, the policy aligns itself to one of the six big projects identified in the 'Milton Keynes Futures 2050 Commission Report': *'to create an even stronger city centre fit for the 21st century'*.

10.18.9 Policy **ER1** (Employment Sites within the Borough of Milton Keynes) states that planning permission will be granted on vacant employment land, with *'the need for a variety of sites to meet the differing requirements of a wide range of employment uses'*. The policy outlines the intent to focus the development of additional office, research and development floorspace in Central Milton Keynes, in order to support and enhance the growth of the town centre and align to the development strategy for Plan MK. Notably, Policy **ER2** (Protection of Existing Employment Land and Premises) supports Policy **ER1** by stating that *'planning permission will be refused for the change of use of redevelopment of any land identified for employment use'* unless, amongst other things, *'there is no longer a reasonable prospect of it being used for the existing or designated employment use'*.

10.18.10 Policy **ER4** (Home Base Business) states that planning permission for businesses within residential properties will be granted if, amongst other criteria, *'the property will continue to remain in residential use'*, *'the proposed business use will be restricted to the employment of the occupiers of the dwelling'* and *'the proposed business use would not cause serious harm to the living conditions of adjoining properties'*. The adaptability and flexibility of homes is particularly beneficial in the context of the 14% of Milton Keynes residents (approximately 12,600 people) who work at home for at least part of the week.

10.18.11 Policy **ER5** (Protection of Small Business Units) states that planning permission will be refused for proposals that would involve the loss of small businesses, with the aim of the policy to protect the current and future supply of units.

10.18.12 Policy **ER18** (Tourism, Visitor and Cultural Destinations) states that planning permission will be granted for tourism, visitor and cultural development where:

1. *The development is of a use, form and scale which does not harm the quality of the natural or built environment;*
2. *It benefits local communities; and*
3. *It strengthens the overall tourism offer.*

Improving the cultural offer of Milton Keynes is one of the six projects outlined within the 'MK Futures 2050 Commission Report', and this policy positively seeks to encourage growth and development in tourism and visitor attractions within the borough. The policy goes on to state that development should be located within town centres in order to ensure that they are suitably located and easily accessible. Notably, Policy **ER17** (Hotel and Visitor Accommodation) supports Policy **ER18** through favouring the development of new hotels and other purpose-built visitor accommodation within town centres. Policy **ER17** also states that the Council will 'support the provision of new hotels and visitor accommodation to serve visitor attractions within the city'.

10.18.13 Policy **ER9** (Employment Uses and the Rural Economy) states that '*proposals which sustain and enhance the rural economy by creating or safeguarding jobs and businesses will be supported where there are of an appropriate scale for their location and respect the environmental quality and character of the open countryside*'. Notably, this policy positively supports sustainable growth within the borough by encouraging proposals for new employment opportunities to help diversify the rural economy and offset job losses from declining sectors of the rural economy.

10.18.14 A range of other policies are also of relevance to the achievement of economic objectives, including the policies dealing with 'Employment', 'Business' and 'Services and Facilities'. There is also the need to consider the possibility that other policies may place a burden on businesses and the economy (e.g. policies that restrict retail outside of town centres) or potentially hinder housing delivery (e.g. policies that set requirements for affordable housing); however, on balance there is nothing to suggest that this is the case.

Appraisal of the Proposed Submission Plan

10.18.15 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.**

10.19 Summary conclusions

- 10.19.1 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.
- 10.19.2 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).
- 10.19.3 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.

Cumulative effects

- 10.19.4 The SA process has included a focus on effects not just at the Milton Keynes scale, but at appropriate larger-than-local functional scales, taking account of other Local Plans. Such effects might be described as 'cumulative effects'.
- 10.19.5 In particular, there is a need to consider the effects of Plan:MK not just on the MK administrative area but on: the MK urban area, which extends into neighbouring Aylesbury Vale District, and might potentially extend into neighbouring Central Bedfordshire District; and the Oxford – MK – Cambridge corridor, which intersects numerous local authority areas.
- 10.19.6 Economic growth matters have emerged as perhaps the key 'larger than local' consideration, with the conclusion reached that the plan performs very well. The proposal is to provide for a quantum of employment growth over-and-above that identified as strictly necessary through modelling work, thereby building-in flexibility to ensure that economic growth opportunities within the corridor can be fully realised. Flexibility is important, recognising that uncertainty exists regarding what other Local Plans in the corridor will deliver.
- 10.19.7 Secondary school provision is potentially another 'larger than local' issue, recognising that school catchments can stretch across local authority administrative boundaries. Delivery of a secondary school at East of the M1 and/or SE MK could potentially help to 'unlock' growth within Central Bedfordshire District. At the current time, there is an expectation that any scheme to the East of M1 would deliver a secondary school; however, there is currently less certainty in respect of SE MK.

PART 3: WHAT HAPPENS NEXT?

11 INTRODUCTION (TO PART 3)

11.1.1 The aim of this chapter is to explain next steps in the plan-making / SA process.

12 PLAN FINALISATION

12.1.1 Subsequent to publication stage, 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 (in addition to the SA Report and other submitted evidence) before determining whether the plan is sound (or requires further modifications).

12.1.2 If found to be 'sound' the plan will be formally adopted by the Council. At the time of Adoption an 'SA Statement' will be published that sets out (amongst other things) *the measures decided concerning monitoring*.

13 MONITORING

13.1.1 At the current time, there is a need to present 'measures envisaged concerning monitoring'.

13.1.2 The Proposed Submission Plan includes a proposed monitoring framework, which lists indicators covering the majority of issues that are a focus of the appraisal presented above (Chapter 10). In relation to the achievement of 'Housing' objectives, the proposal is to monitoring 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.

APPENDIX I - REGULATORY REQUIREMENTS

As discussed in Chapter 2 above, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report; however, interpretation of Schedule 2 is not straightforward. Table A links the structure of this report to an interpretation of Schedule 2 requirements, whilst Table B explains this interpretation.

N.B. This report is not the SA Report, but aims to present the required information nonetheless.

Table A: Questions answered by this SA Report, in-line with an interpretation of regulatory requirements

		Questions answered	As per regulations... the SA Report must include...
Introduction		What's the plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
		What's the sustainability 'context'?	<ul style="list-style-type: none"> Relevant environmental protection objectives, established at international or national level Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
	What's the SA scope?	What's the sustainability 'baseline'?	<ul style="list-style-type: none"> Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan The environmental characteristics of areas likely to be significantly affected Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What are the issues and objectives that should be a focus?	<ul style="list-style-type: none"> Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
Part 1	What has plan-making / SA involved up to this point?		<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) The likely significant effects associated with alternatives Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan
Part 2	What are the SA findings at this current stage?		<ul style="list-style-type: none"> The likely significant effects associated with the draft plan The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan
Part 3	What happens next?		<ul style="list-style-type: none"> A description of the monitoring measures envisaged

Table B: Questions answered by this SA Report, in-line with regulatory requirements

<u>Schedule 2</u>	<u>Interpretation of Schedule 2</u>	
<i>The report must include...</i>	<i>The report must include...</i>	
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>
(c) the environmental characteristics of areas likely to be significantly affected;	The relevant environmental protection objectives, established at international or national level	
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	i.e. answer - <i>What's the 'baseline'?</i>
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The environmental characteristics of areas likely to be significantly affected	
(f) 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 the above factors;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Key environmental problems / issues and objectives that should be a focus of appraisal	i.e. answer - <i>What are the key issues & objectives?</i>
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach)	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]
(i) a description of the measures envisaged concerning monitoring.	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]

Whilst Tables A and B signpost broadly how/where this report meets regulatory requirements, as a supplement, Table C presents a discussion of more precisely how/where regulatory requirements are met.

Table C: ‘Checklist’ of how and where (within this report) requirements have been, are and will be met.

Regulatory requirement	Discussion of how requirement is met
Schedule 2 of the regulations lists the information to be provided within the SA Report	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Chapter 3 (‘What’s the plan seeking to achieve’) presents this information.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan;	The scoping stage considered issues/objectives that should be a focus of SA, including through consultation on a Scoping Report.
c) The environmental characteristics of areas likely to be significantly affected;	The outcome of scoping was an ‘SA framework’, which is presented as Table 4.1, above.
d) Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance...;	Also, more detailed issues/objectives established through scoping are presented within Appendix II.
e) The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan and the way those objectives and any environmental, considerations have been taken into account during its preparation;	<p>The Scoping Report presents a detailed context review, and explains how key messages from the context review (and baseline review) were then refined in order to establish an ‘SA framework’.</p> <p>The SA framework is presented in Table 4.1. Also, messages from the context review are presented within Appendix II.</p> <p>With regards to explaining “<i>how... considerations have been taken into account</i>” -</p> <ul style="list-style-type: none"> • Chapters 6 explains how reasonable alternatives were established in-light of earlier consultation/ SA. • Chapter 8 explains the Council’s ‘reasons for supporting the preferred approach’, i.e. explains how/why the preferred approach is justified in-light of alternatives appraisal (and other factors).
f) 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 the above factors;	<ul style="list-style-type: none"> • Chapter 7 presents alternatives appraisal findings (in relation to the spatial strategy, which is the ‘stand-out’ plan issue and hence that which should be the focus of alternatives appraisal/consultation). • Chapters 10 presents the Proposed Submission Plan appraisal. <p>As explained within the various methodology sections, as part of appraisal work, consideration has been given to the SA scope.</p>

Regulatory requirement	Discussion of how requirement is met
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Chapter 10 presents a number of recommendations.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	<p>Chapters 5 and 6 deal with ‘Reasons for selecting the alternatives dealt with’, in that there is an explanation of the reasons for focusing on particular issues and options.</p> <p>Also, Chapter 8 explains the Council’s ‘reasons for selecting the preferred option’ (in-light of alternatives appraisal).</p> <p>Methodology is discussed at various places, ahead of presenting appraisal findings, and limitations are also discussed as part of appraisal narratives.</p>
i) description of measures envisaged concerning monitoring in accordance with Art. 10;	Chapter 13 presents measures envisaged concerning monitoring.
j) a non-technical summary of the information provided under the above headings	The NTS is a separate document.
The SA Report must be published alongside the draft plan, in-line with the following regulations	
authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)	<p>An Interim SA Report were published as part of the Draft Plan:MK consultation, presenting targeted information.</p> <p>At the current time, this SA Report is published alongside the Proposed Submission Plan, under Regulation 19, so that representations might be made ahead of submission.</p>
The SA Report must be taken into account, alongside consultation responses, when finalising the plan.	
The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.	<p>The Council took into account the Interim SA Report, alongside consultation responses received, when finalising the Proposed Submission Plan for publication.</p> <p>Appraisal findings presented within this current SA Report will inform a decision on whether or not to submit the plan, and then (on the assumption that the plan is submitted) will be taken into account when finalising the plan at Examination (i.e. taken into account by the Inspector, when considering the plan’s soundness, and the need for any modifications).</p>

APPENDIX II - CONTEXT AND BASELINE REVIEW

Introduction

As discussed in Chapter 4 ('What's the scope of the SA?') the SA scope is primarily reflected in a list of objectives ('the SA framework'), which was established subsequent to a review of the sustainability 'context' / 'baseline', analysis of key issues, and consultation. The aim of this appendix is to present a summary of the context / baseline review.

Education

The 2011 Census identified that there were 12,840 students aged 16 to 74 living in Milton Keynes in 2011, with others travelling into Milton Keynes to attend the two main institutions in the city: Milton Keynes College and the University Campus Milton Keynes associated with the University of Bedfordshire. The total number of students makes up around 8% of the Milton Keynes population, but there are no halls of residence and most students are aged 16-18 and so mostly live with parents.

The Milton Keynes Skills Strategy approved by the Council in February 2016 aims to support the growth of the local economy by ensuring local people have the skills businesses need. The Strategy centres on the vision that: *"By 2021 Milton Keynes will have built on its current economic success, and be a thriving city with a sustainable employment offer which provides opportunities for all. Through a successful demand-led local employment and skills approach, the skills and qualification profile of the area will meet employer needs and position Milton Keynes as the location of choice for new investment"*.

To achieve this vision, the Skills Strategy contains four strategic priorities:

- Raising standards in education and training provision
- Raising awareness of education, training and employment opportunities by providing excellent information, advice and guidance
- Creating a demand-led system between business and education
- Widening participation and enhancing the labour pool.

The Council's School Place Planning: Forward View 2017-18 identifies that as a result of significant demographic growth and despite significant capital investment in numerous schemes over each of the past few years, there remains a projected shortage of school place provision in a number of areas. Additionally, to reflect the recommendations of the MK Futures 2050 Commission Report, the following initiatives will be championed in order to enhance lifelong learning opportunities across the Borough:

- MK:U - the creation of a new university within the city with a focus on STEM subjects (Science, Technology, Engineering and Mathematics), transport technology such as driverless cars, and the Smart city. It will provide opportunities for undergraduates and lifelong learning, promoting research, teaching and practice. This institution will help not only to reverse the 'brain drain' of young people leaving the city for university education elsewhere but also to attract people to come to the city ('brain gain'). The establishment of a new university for Milton Keynes will also make it easier for employers to recruit skilled workers.
- Learning 2050 - to raise attainment standards across the board, Milton Keynes will continue to develop high quality school facilities and encourage the ambition of further education providers. The ultimate aim is a high achieving, all embracing system providing a continuum of opportunity.

Health and deprivation

The Milton Keynes Joint Health and Wellbeing Strategy, 2015-2018 recognises that the overall health of the Milton Keynes population demonstrates a need for improvement with a higher demand in the areas of greatest deprivation. Statistics indicate that life expectancy within the most deprived areas of Milton Keynes is more than five years lower than in the more affluent areas.

Notably, the Joint Health and Wellbeing Strategy identify the following issues:

- Too many children have a poor start to life and suffer health problems, almost a third of Year 6 pupils are overweight or obese and rates of admissions for lower respiratory tract infection among children have been higher than the England average.
- Life expectancy, whilst it has improved over the past decade, remains half a year below the national average for England for both men and women and far too many people's lives continue to be shortened because of smoking, excessive drinking, unhealthy eating and physical inactivity.
- Mental health problems affect people of all ages. Approximately 26,000 of our residents are thought to have a mental health disorder and over 11,000 have two or more mental health disorders. Among older people the most common problems we see are depression and anxiety.
- The city's environment could contribute more to healthy outcomes. Within Milton Keynes, there is a high quantity of car users and low levels of cycling. There is a risk that increasing the number of houses will lead to increased levels of car travel which could impact on air quality and noise levels.
- In 2011, around 14% of the borough's population had a long-term health problem or disability that affects their ability to carry out day to day activities.

Datasets on disability show that currently around 1-in-30 households in England (3.3%) have at least one wheelchair user, although the rate is notably higher for households living in affordable housing (7.1%) and in older age groups (in both market and affordable tenures). An analysis within the Council's Strategic Housing Market Assessment indicates that the projected increase in households likely to need wheelchair accessible housing accounts for 5% of the overall housing requirement, and 10% within affordable tenures.

The Index of Deprivation shows some notable trends –

- 9 lower super output areas are in the 10% most deprived in England, compared to 7 in 2010, 6 in 2007 and 5 in 2004 index.
- 21 lower super output areas are in the 20% most deprived in England, compared to 18 in 2010, 15 in 2007 and 13 in the 2004 index.
- 12 lower super output areas are in the 10% least deprived in England, compared to 17 in 2010, 14 in 2007 and 14 in the 2004 index.
- 31 lower super output areas are in the 20% least deprived in England, compared to 51 in 2010, 49 in 2007 and 40 in the 2004 index.

Housing

Milton Keynes Council has prepared a Strategic Housing Market Assessment (SHMA) to objectively assess the housing need for the Borough over the plan period of 2016 – 2031, taking account of both the growth of the existing population and net in-migration to the area. This gives an Objectively Assessed Need (OAN) for the plan period 2016-2031 of approximately 26,500 dwellings.

The SHMA recommends that 57% of new market homes should be three bedroom houses, and only 14% should be 1-2 bedroom properties (including both flats and houses). This differs markedly to the affordable tenure, where it recommends that 38% should be three bedroom houses and 51% should be 1-2 bedroom properties (primarily 2 bed houses). It also notes that there will be a need for over 900 large affordable homes (4 and 5+ bedrooms) to be provided over the plan period. Overall, 8,200 of new dwellings within the borough should be affordable, accounting for 30.9% full OAN for the plan period.

Services and facilities

The original city was planned so that most residents would be within a short walking distance (500 metres) of a Local Centre, maximising the opportunities for people to walk or cycle to facilities, particularly those without access to a car. The Council would expect that the majority of all new dwellings should be within 500 metres of a Local Centre. Additionally, the Council's approach to open space and recreational facilities will adapt and take into account changes to sporting and community trends, behaviours and new technologies that impact activity in Milton Keynes.

Community facilities such as meeting places and multi-functional sports pavilions need to be accessed by not only local residents but also by people from across Milton Keynes, to enable them to be economically

sustainable. Therefore they are best located on sites with suitable links to public transport or with sufficient parking facilities.

Air quality

The only AQMA within the borough is located in Olney, principally due to traffic emissions along the A509 through the town. Any development within or adjacent to areas designated as an AQMA, or otherwise with the potential to affect air quality within an AQMA, must have regard to guidelines for ensuring air quality is maintained at acceptable levels. Certain forms, types and scale of development can increase or introduce new sources of emissions and reduce air quality.

The major source of air pollution in the borough is traffic emissions. Also, dust and odour associated with existing uses and new development (including construction) can cause nuisance and be harmful to people and the natural environment.

Biodiversity

There are two nationally important Sites of Special Scientific Interest (SSSIs) wholly in the Borough: Howe Park Wood and Oxley Mead. In addition, along the Borough boundary with Northamptonshire can be found Yardley Chase, Salcey Forest and Mill Crook SSSIs.

It is important to recognise that there are many other sites which can be equally important as SSSIs, but which do not have the same level of protection. Many of these sites have been identified in the Borough and are classified as Milton Keynes Wildlife Sites (MKWS). There are 16 MKWS in the Borough. MKWS are equivalent of Local Wildlife Sites (LWS) in other Buckinghamshire districts while our smaller local wildlife sites have a status of Biological Notification Sites (BNS).

Additionally, wildlife Corridors in Milton Keynes are a specific designation to Milton Keynes and represent linear pathways of habitats that encourage movement of plants and animals between other important habitats. These are treated in the same way as LWSs in Milton Keynes. The 21km stretch of the Grand Union Canal in the Borough passes through rural, semi-rural and urban landscapes, and is therefore an important wildlife corridor.

An independent review of England's wildlife sites and ecological network concluded that establishing a coherent and resilient ecological network of wildlife sites capable of responding to the challenges of climate change would effectively conserve biodiversity and ecosystem services, delivering many benefits to people. As such, there is an opportunity for Plan MK to develop resilient ecological networks and enhance the green and blue infrastructure within the borough, supported by the 'Vision for Green Infrastructure in Buckinghamshire' report published by the NEP in 2016.

Climate change

In 2010 the Council adopted a Low Carbon Living Strategy, which set out a target of reducing carbon emissions per person in the Milton Keynes area by 40% by 2020, from a 2005 baseline. According to DECC, per capita CO₂ emissions in the Borough have declined from 7.8 tonnes in 2005 to 5.3 tonnes in 2014. This constitutes a fall of 32%, which is on track to meet the 40% target by 2020. An updated Low Carbon Living Strategy called 'Imagine MK 2050 Strategy' was adopted by Milton Keynes Council in October 2014. The new Strategy aims for a near zero carbon Milton Keynes by 2050.

Culture and heritage

The identity, heritage and historic environment of Milton Keynes is rich and diverse, with the designated 'New Town' contrasting with original villages within in it and the surrounding rural landscape.

The designated 'New Town' incorporates 13 historic villages and the historic towns of Bletchley, Stony Stratford, New Bradwell and Wolverton. To the north and east lie small farming villages and historic market towns such as Olney, Newport Pagnell, Hanslope and Sherington. To the south and east are the villages of the Brickhills and the 19th Century resort town of Woburn Sands. Wolverton is a unique Victorian and Edwardian railway town and former works, whilst Bletchley is the location of the internationally significant, World War Two code-breaking facility, Bletchley Park.

Designated areas/sites/assets include 27 conservation areas; registered parks / gardens at Chicheley, Gayhurst and Tyringham; over 1,100 listed buildings; and 50 scheduled monuments, which range in date and character from Bronze Age burial mounds to the Roman town of Magiovinium, medieval castles and villages, and the cast-iron Tickford Bridge in Newport Pagnell. Milton Keynes Historic Environment Record (HER) also contains information on over 7,000 archaeological sites and finds, with many new discoveries made each year.

In order to sustain and enhance the significance of Milton Keynes' rich and varied historic character, important local distinctiveness and its sense of place, Milton Keynes will implement a positive strategy for the conservation and enjoyment of the historic environment. Milton Keynes Council will review its 27 conservation areas in order to confirm that they justify their status because of their special architectural and historic interest and establish an overview of the condition of heritage within the Borough by identifying those assets at risk or threat of decay, publishing it in a public register.

The emerging new Cultural Strategy 2018-2027, will be overarching and include the three sector-specific strategies: Arts and Public Art Strategy; the Heritage, Museums and Archives Strategy; and the Sports and Active Communities Strategy.

Landscape

A borough-wide Landscape Character Assessment (LCA) was prepared in 2016. The LCA identifies the distinctive characteristics of the landscapes across the Borough, and provides guidance for future policies on development, restoration and management in.

There are 6 Landscape Character Types (LCT) within the borough, described below:

- The 'City Plateau Farmland' LCT - is a gently undulating plateau containing large to medium scale woodlands, linking with the extensive woods of Yardley Chase and Salcey Forest in Northamptonshire;
- The 'River Valley' LCT - contains slow flowing meandering rivers which are tranquil in their character, situated next to areas of pasture with open field patterns;
- The 'City Plateau Farmland with Tributaries' LCT - has an elevated topography with long distance and panoramic views across open areas which are sparsely settled with woodland and mature hedgerows.
- The 'Clay Lowland Farmland' LCT - is a low-lying and generally flat landscape on the urban edge of Milton Keynes, with a mix of arable, pasture and recreational land uses.
- The 'Undulating City Farmland' LCT - is a lowland landscape which slopes down towards the river valley floor and contains a number of historic limestone villages, historic parklands and occasional stone walls;
- The 'Greensand Ridge' LCT - contains a high proportion of woodland cover including areas of both deciduous and conifer plantations. The landscape is extensively used for recreational purposes including walking, cycling, riding and golf courses.

Furthermore, green infrastructure and open space is a key feature of the city, with high levels of good quality accessible spaces that give Milton Keynes a unique character. The city is well served by linear parks, mostly along the river valleys that run through the city and along its edges. These are multi-purpose green spaces that are maintained by the Parks Trust and primarily provide flood water storage alongside recreational facilities, ecological resources and attractive settings for development. There is an opportunity for Plan MK to enhance the green and blue infrastructure within the borough, supported by the 'Vision for Green Infrastructure in Buckinghamshire' report published by the NEP in 2016.

Natural resources

When considering proposals on land which may be contaminated, the Council will need to assess whether development would be suitable (based on the type of contamination) and whether there are likely to be any unacceptable risks to health or to the environment that may arise from remedial works or proposed use of the site. For permission to be granted, the Council will need to be satisfied that there will be no unacceptable risks. After remediation, land should not be capable of being classified as contaminated land under Part IIA of the Environmental Protection Act 1990.

Noise pollution

Noise and vibration can have a detrimental effect on health and the natural environment. National planning policy requires local policies to avoid giving rise to unacceptable noise impacts and give careful consideration to proposals that would have significant adverse effects.

The siting, layout, landscaping and detailed building design of proposals, coupled with other noise-specific mitigation measures, should seek to avoid and minimise the adverse impacts of noise and vibration rather than rely upon expensive and ineffective retrospective measures.

Noise-sensitive developments, such as housing, schools, residential and nursing homes, should be separated from major sources of noise. British Standard 6472-1:2008 Evaluation of human exposure to vibration within buildings will be used to evaluate exposure to vibration.

Transport

Milton Keynes has a high level of car use for meeting travel demand, with car ownership being higher than the national average and the transport modal share being dominated by single occupancy car use.

Milton Keynes iconic grid road system forms an interconnected transport network with roundabouts at most grid way sections, providing a choice of routes across the city. The 'Redways' are a network of over 270 km of safe paths (generally surfaced with red tarmac) that criss-cross the entire city of Milton Keynes, and are regularly used by cyclists and walkers.

The Milton Keynes Transport Vision and Strategy LTP3 2011 to 2031 centres around the vision that: *"By 2031, Milton Keynes will have the most sustainable transport system in the country, increasing its attractiveness as a place to live, work, visit, and do business. There will be a real transport choice to satisfy individual preferences and encourage more sustainable travel behaviour. The transport system will provide fast and efficient movement of people and goods, and will be accessible for all."*

Transport modelling work has been completed to examine the traffic implications of current committed growth, examining the likely situation in 2031. Figures A and B show the location of housing and economic growth taken into account by the model; Figure C shows the new transport infrastructure which the model assumes will be implemented; and Figure D shows the model output, i.e. predicted increases to delays at junctions.

Figure A: Dwellings Growth to 2031 under the baseline (no plan MK) scenario

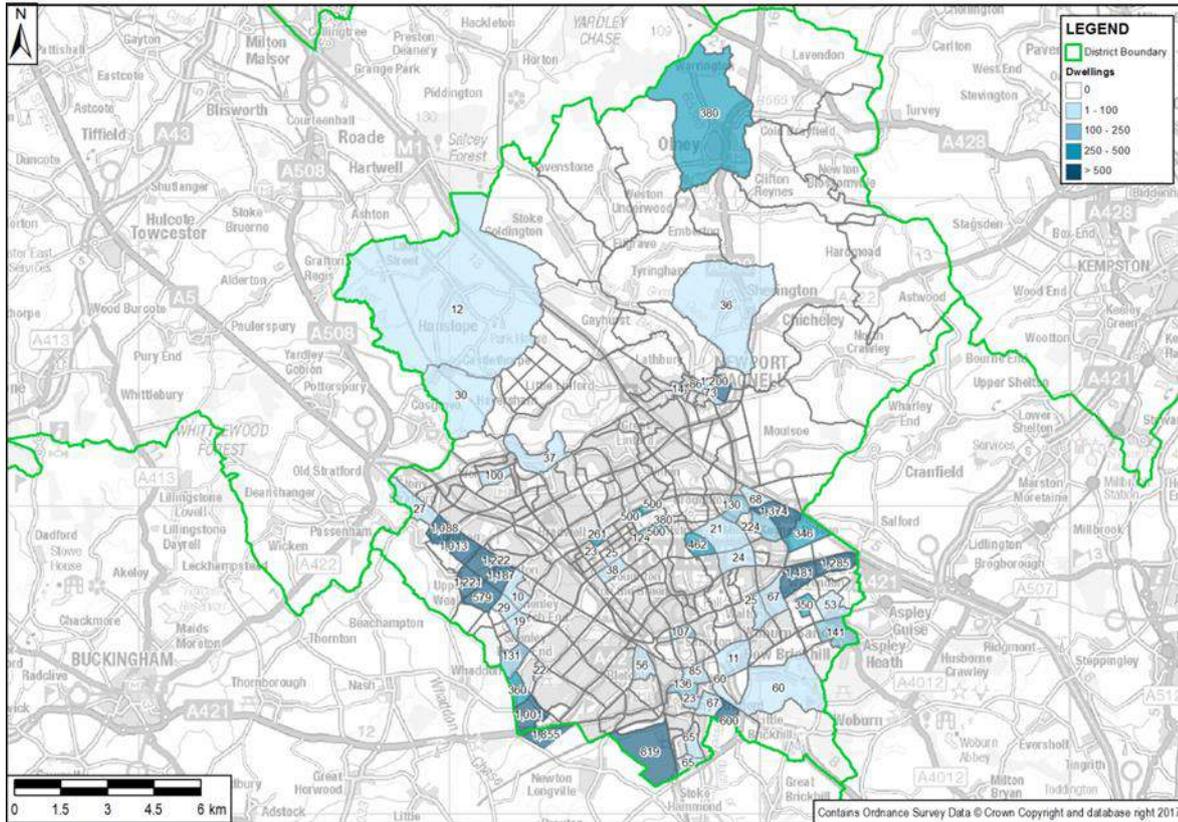


Figure B: Jobs Growth to 2031 under the baseline (no plan MK) scenario

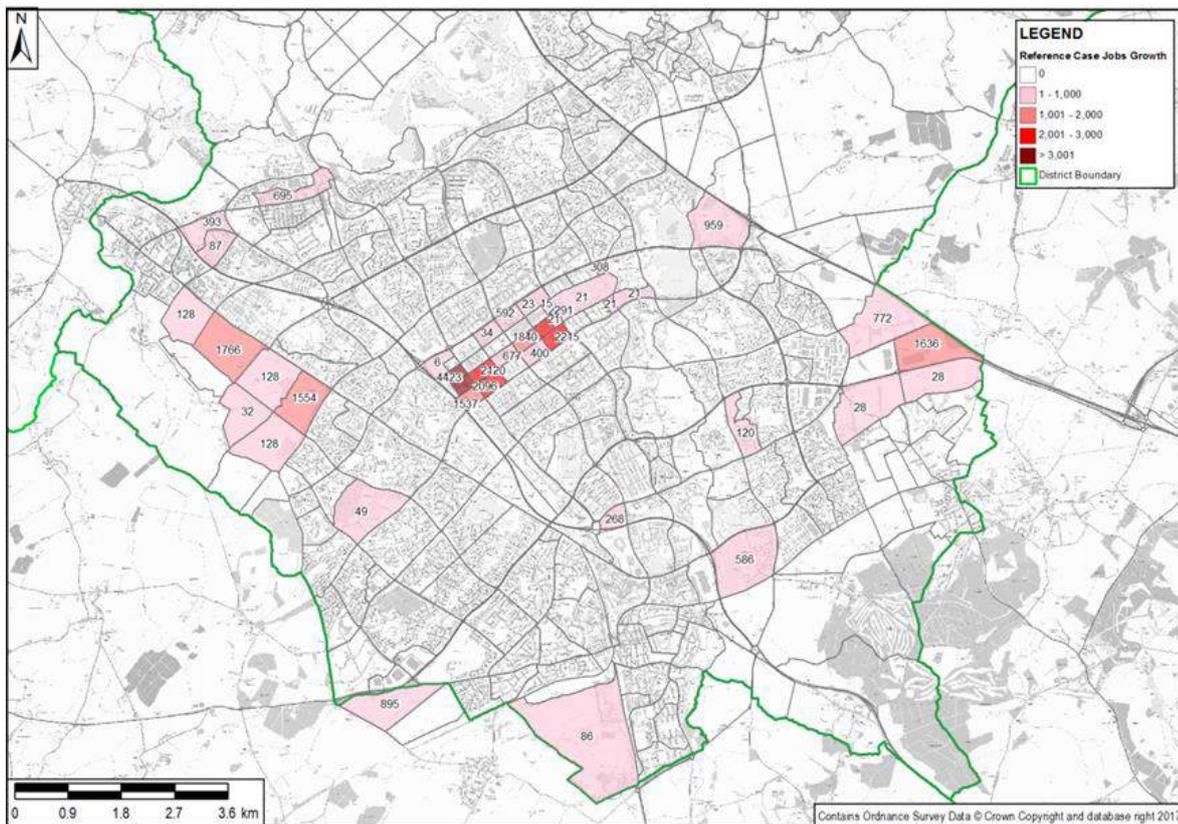


Figure C: Committed road upgrade schemes

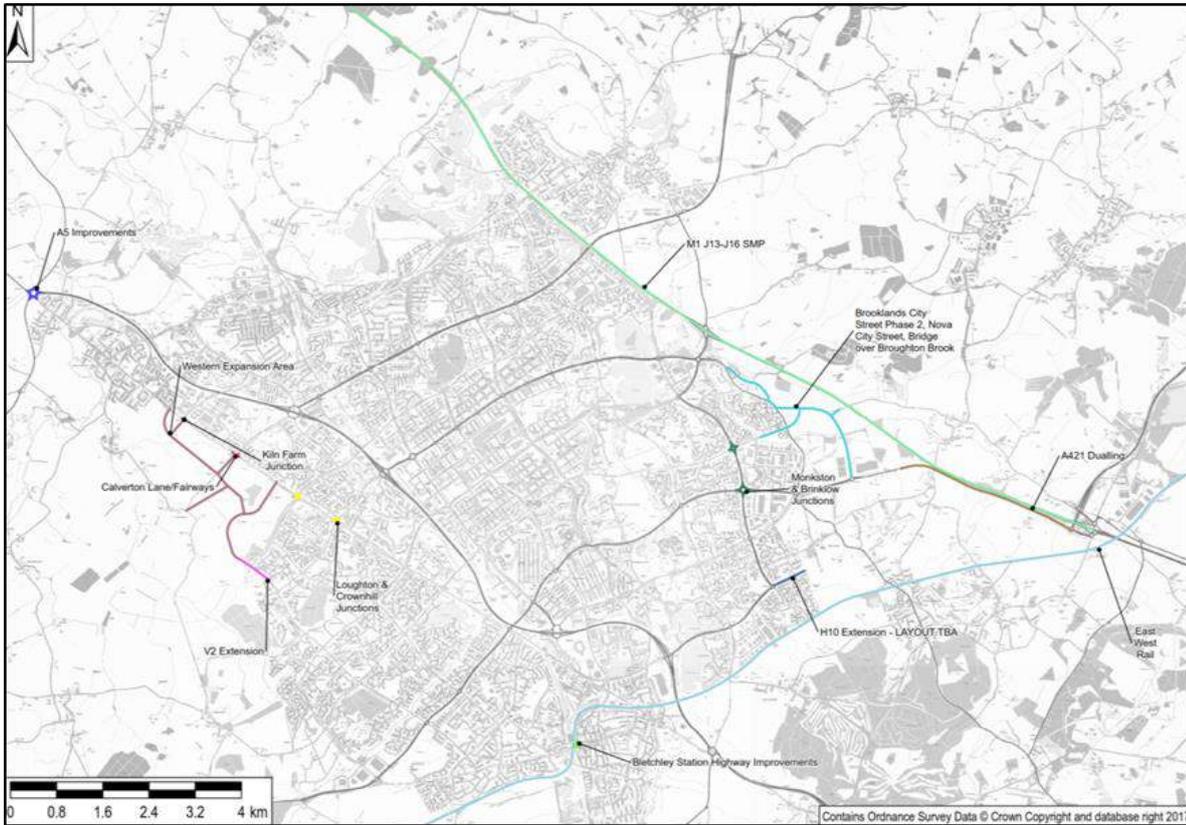


Figure D: Junction delays 2031 under the baseline (no plan MK) scenario



Water

In terms of water supply, the majority of the borough falls into the Ruthamford South Water Resource Zone, which is one of the zones within the Anglian region that is the most water stressed. In order to address the water deficits across the region, including Milton Keynes, water efficiency is a central strand of Anglian Water's Water Resource Management Plan.

In regards to the wider water environment, new development has the potential to interfere with existing drainage systems, decrease floodplain storage, reduce permeable surface areas and increase the volume and speed of runoff through a catchment, ultimately leading to dramatic changes to river catchment characteristics and subsequently increase food risk. Additionally, it is expected that even with no further development, the impacts of climate change are likely to further increase the risks.

Economy, business and employment

The number of employee jobs within the Borough has grown more rapidly than the supply of new dwellings; from 2010 to 2015, the number of full and part-time jobs increased by 23,000 while the number of dwellings grew by around 6,600, a ratio of around 3.5 jobs per dwelling. A consequence of this rapid employment growth has been increased in-commuting to the city putting additional pressures on local transport infrastructure and increasing traffic congestion at peak times.

If the city is to maximise its potential as part of the single, knowledge-intensive cluster being developed in the Cambridge - Milton Keynes - Oxford corridor and benefit from the tendency of knowledge based businesses to want a city centre location, the Council will need to encourage the provision of new office floor space and related development on parcels of land within the city centre and where opportunities occur from the redevelopment of existing city centre buildings.

The 2015 Employment Land Study report concluded the Borough had sufficient land to accommodate its office and industrial requirements, including scientific and technical office-led developments, both within CMK and outside it. The strategy for supporting the economic needs of the Borough will be delivered by the continued development of Central Milton Keynes, retaining and developing existing employment sites and by allocating new employment land at appropriate locations to provide a flexible supply of sites to cater for future employment needs.

Within the Borough, the main area for office development over the plan period will be in CMK, which is consistent with the sequential approach of the NPPF where main town centre uses (such as offices) should be located within a 'town centre'.

Despite the density of businesses per hectare being lower in Central Milton Keynes (CMK) than in many other city centres, CMK has developed a very strong economy and is the largest employment location within the borough.

The city centre needs to overcome barriers to the growth and expansion of businesses if it is to grow and develop. The main barrier to growth is due to the fact that much of the existing office stock within the city centre is elderly and has not been refurbished; about 75% was built before 2000. It is no longer 'fit for purpose' and does not meet the needs of modern occupiers. To grow the knowledge economy the stock of high quality grade 'A' office floor space in the city needs to be increased.

As the numbers of people living and working in the city centre rises, this will in turn stimulate the growth of shops, restaurants, visitor accommodation, leisure, cultural and entertainment facilities, making CMK an even stronger city centre and a more attractive and dynamic location for people to live and work in. This process will also help attract highly skilled workers to Milton Keynes who are needed to fuel productivity.

Additionally, the Council is seeking to ensure a supply of start-up accommodation, largely provided by the private sector, to meet the needs of micro-businesses (9 employees or fewer) and small businesses (10-49 employees). Furthermore, the Council is keen to encourage the delivery of superfast broadband to make Milton Keynes a more attractive business location and provide opportunities for home and flexible working.

Data from the Government Valuation Office data shows that from 2004 to 2012, the Borough of Milton Keynes had the largest expansion of retail floor space of any local authority outside of London. Retail floor space grew by 23%, and by comparison, growth in England was 3% over this period.

APPENDIX III –SHORTLISTED MK EDGE SITE OPTIONS

Introduction

As explained within Chapter 6 above, as an ‘interim’ step (summer 2017) to inform the development of spatial strategy alternatives, a shortlist of MK site options – see **Table A** - was subjected to informal appraisal. The **aim of this appendix** is to present that appraisal.

Methodology

Table B presents a narrative on the site options, under the headings of the established SA framework. Within each narrative there is a discussion of sites that perform notably well, or notably poorly. The aim is not to systematically discuss each of the 8 site options in terms of each of the 18 SA topics/objectives.

N.B. summary conclusions on each of the site options are presented within Table 6.4, above.

Table A: The shortlisted MK edge site options

Name	Scale*	Introduction
Wavendon Golf Course	700	<ul style="list-style-type: none"> Golf course east of Wavendon, south of the Core Strategy Strategic Land Allocation; comprising much of the ‘triangle’ of land bounded by Newport Rd, Lower End Rd and Cranfield Rd. Assessed as an element of the ‘Wavendon and Woburn Sands’ strategic site option within the March 2017 Interim SA Report.
WEA Expansion	1,000	<ul style="list-style-type: none"> Two sites to the west of the Western Expansion Area (the c.6,000 home Local Plan 2005 allocation, which is under construction). Assessed as a strategic site option within the March 2017 Interim SA Report.
Shenley’s Den Farm	1,500	<ul style="list-style-type: none"> South of the Western Expansion Area (the c.6,000 home Local Plan 2005 allocation, which is under construction).
Wavendon/ Woburn (‘eastern’) broad area	1,500+	<p>In addition to Wavendon Golf Course (discussed above), there is developer interest in the remaining area of land in the Woburn Sands area, north of the railway.</p> <p>The first point to note is that a 200 home scheme at ‘Land North of Cranfield Road, Woburn Sands’ was refused planning permission in January 2017 (16/00672/OUT; an appeal is pending). This site is associated with Woburn Sands, rather than the edge of MK, but could be seen to loosely adjoin the MK edge were the Wavendon Golf Course site also to come forward.</p> <p>An eastwards ‘expansion’ to this site, essentially comprising the remaining land within MK borough, was then proposed in 2016, through the SDD consultation. However, no site boundary was proposed, and the site was not promoted through the 2016 Draft Plan:MK consultation.</p> <p>Finally, a large cross boundary site in this area (the majority within Central Bedfordshire District) was proposed in 2016, through the SDD consultation. However, the site was not promoted through the 2016 Draft Plan:MK consultation.</p> <p>In short, it is clear that there is feasibly the opportunity to complete the eastwards expansion of MK in this direction, and for the expansion to cross over into the ‘Apsley Guise Triangle’ part of Central Bedfordshire.</p>

Name	Scale*	Introduction
South East of MK	3,000	<ul style="list-style-type: none"> • Mostly adjoins the existing SE MK urban edge, south of Tilbrook / Brown’s Wood (and the railway) and north of Bow Brickhill; also includes a northern section, abutting the eastern edge of the Core Strategy Strategic Land Allocation southern section, west of Woburn Sands / south of Wavendon. • Proposed as an allocation in Draft Plan MK (2017); with 1,000 homes in the plan period. • Assessed as a site option within the March 2017 Interim SA Report.
East of the M1 (north)	3,000+	<ul style="list-style-type: none"> • East of the M1, south of Newport Pagnell (A422). • Proposed as a ‘reserve site’ in Draft Plan MK (March 2017). • Assessed as a site option within the March 2017 Interim SA Report.
East of the M1 (south)	3,000+	<ul style="list-style-type: none"> • East of the M1, southeast of Moulsoe; cross-border site (the majority falling within Central Bedfordshire).
North of MK	3,000+	<ul style="list-style-type: none"> • North of the Great Ouse, and the villages of Haversham and Little Linford, between the West Coast Mainline and M1. • Assessed as a site option within the March 2017 Interim SA Report (along with a smaller ‘Haversham Extension’ option, which can now be discounted, as it is not being promoted).

Table B: Informal appraisal of shortlisted MK edge site options

Reduce levels of crime and create vibrant **communities**.

A primary consideration is the need to support larger schemes, which are able to deliver strategic community infrastructure. This in turn leads to a suggestion that there is merit to supporting the three notably **larger schemes** (3,000+ homes), each of which would be expected to deliver an employment, retail and a range of community facilities including a secondary school. However, there are also potential draw-backs to each of these schemes, given distance to, and separation from, the existing MK urban area.

Other MK urban edge sites would also deliver some community infrastructure, although this would be limited in the case of the **WEA Expansion** and **Wavendon Golf Course**, neither of which would be likely to deliver a primary school.

Another consideration is the potential for housing growth to ‘load pressure’ onto existing infrastructure with limited or no capacity and/or new infrastructure being delivered to meet an already established need. This is perhaps of greatest concern to the east of MK, and hence of greatest concern for **Wavendon Golf Club** and **the Eastern Broad Area**. There is an understanding that extensive committed growth to the east of MK - within the Expansion Area and Strategic Growth Location - should be given time to ‘bed in’.

Shenley’s Den, to the west, potentially stands out as being relatively well linked to existing community facilities, with a secondary school in very close proximity, and a leisure centre a short distance away, along a grid road. The site would also link well to the WEA, to the north.

Reduce the gap between the most deprived areas of Milton Keynes and the average.

The Index of Multiple Deprivation (2015) dataset shows a band over more deprived areas running through MK, from north to south, with Bletchley and Wolverton being two established regeneration priority areas at either end of this 'band'. However, none of the MK edge site options under consideration are in close proximity to an area of relative deprivation, and hence there is little reason to suggest the potential for development to result in benefits.

Affordable housing provision is another important consideration, with a bearing on achievement of this objective. All of the sites in question would be expected to deliver a good proportion of affordable housing, in accordance with policy. It is also fair to conclude that the larger site options could help to ensure a long term supply of affordable housing; however, on the other hand, these larger sites might not deliver until late in the plan period. There is a need to increase affordable housing delivery in the early part of the plan period, as far as possible. See further discussion of the housing supply 'trajectory' below, under 'Housing'.

Improve **education** attainment and qualification levels so that everyone can find and stay in work.

The matter of delivering new schools is discussed above. Two sites are identified that would likely not deliver a primary school (and hence would increase pressure on existing infrastructure) and five identified that would not deliver a secondary school (and hence would increase pressure on existing infrastructure).

Protect and improve residents' **health** and reduce health inequalities.

The majority of sites would be of a scale sufficient to deliver a neighbourhood centre, as part of which there could potentially be a doctor's surgery; however, any decision to deliver a new surgery would need to be made in consultation with the Milton Keynes Clinical Commissioning Group (CCG). The two smaller sites - WEA Expansion and Wavendon Golf Course – would likely not deliver a local neighbourhood centre.

Ensure that everyone has the opportunity to live in an affordable, sustainably constructed home.

There is a need to provide for a good mix of housing sites, which in turn means supporting smaller sites, recognising that the list of committed sites within the Borough includes a disproportionate number of larger sites. A mix of sites will help to ensure a steady 'trajectory' of housing delivery across the entire plan period (such that there is a rolling 'five year housing land supply'). Linked to this, there is a need to support smaller housing sites that are in turn suited to development by small/medium sized housebuilders, as this diversity can add resilience and in turn help to prevent unforeseen dips in the housing trajectory. On this basis, there are arguments against allocation of the three notably **larger sites**. Each would necessitate significant infrastructure upgrades, which inherently brings with it a risk of unforeseen delay.

Another urban edge site associated with a notable delivery issue is **South East MK**, on the basis that there is the potential for a new dual carriageway road to be delivered through the site, as part of the Oxford to Cambridge Expressway. There is no certainty, as the preferred route for the Expressway is yet to be selected; however, it is apparent that if either of the two northern broad route options was to be selected (there are three broad route options in total), then there could potentially be a need for a new road through the site. A cursory view of the map serves to suggest that this might be unlikely (as a direct route between the site and Junction 13 of the M1 would have to pass through, or under, Woburn Sands); however, a degree of risk remains, nonetheless. Were there to be a need for a new road through the site, then it would need to be delivered ahead of housing, leading to considerable risk of delay to housing.

Three other sites – namely the **Wavendon Golf Course**, the **WEA Extension** and the **Eastern Broad Area** – do not currently adjoin the MK urban edge, and hence would need to come forward subsequent to completion of adjacent sites. This inherently results in a delivery timescale that is less certain than that of an equivalent site not reliant on an adjacent site coming forward first.

Three other sites – namely the **Wavendon Golf Course**, the **WEA Extension** and the **Eastern Broad Area** – do not currently adjoin the MK urban edge, and hence would need to come forward subsequent to completion of adjacent sites. This inherently results in a delivery timescale that is less certain than that of an equivalent site not reliant on an adjacent site coming forward first. The latter two sites would need to come forward following delivery of the Strategic Land allocation, which has only delivered 37 properties to date (albeit significant progress is expected over coming years, with all but 120 with outline permission).

Ensure all section of the community have good access to **services and facilities**.

The matter of delivering new community infrastructure is discussed above, under the 'Communities' and 'Education' headings, with the conclusion reached that there is a strong argument for supporting larger scale new developments, which will deliver community infrastructure, notably new school capacity. The majority of MK edge sites would be of a scale sufficient to deliver a new primary school, although there is a question-mark with regards to the Wavendon Golf Course site.

Maintain and improve the **air quality** in the borough.

There are no designated Air Quality Management Areas (AQMAs) within Milton Keynes; however, 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 an AQMA might need to be designated). See further discussion below, under 'Transportation'.

Conserve and enhance the borough's biodiversity.

Taking sites in size order –

- **Wavendon Golf Course** – the eastern part of the site is covered by a Tree Preservation Order, which could be indicative of some biodiversity value.
- **WEA Expansion** – the site is seemingly quite unconstrained, and 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.
- **Shenley's Den Farm** - the site partially wraps around Oakhill Wood, a large ancient woodland (mostly replanted) that falls within the Whaddon Chase Biodiversity Opportunity Area (BOA).
- **Eastern Broad Area** – this area is seemingly quite unconstrained in biodiversity terms.
- **South East MK** – the site is in close proximity to the extensive woodlands associated with the Greensand Ridge, much of which is ancient woodland designated as a Local Wildlife Site (LWS); however, it is not clear that this is necessarily a significant constraint. Residents would benefit from 'access to nature' (there are footpath links), and the woodlands are not known to be at risk of impacts from an increase in recreational pressure.
- **East of the M1 (north)** – the River Ouzel passes north/south through the site, which is associated with some mature trees and other riparian habitat. It forms part of the MK green infrastructure network (although it is noted that there is no footpath along the river).
- **East of the M1 (south)** - this area is seemingly quite unconstrained in biodiversity terms.
- **North of MK** – development would 'leapfrog' the Great Ouse Floodplain, which is associated with wide ranging biodiversity sensitivities. Development would also encroach upon, and potentially wrap around, Little Linford Wood (ancient woodland, but not designated as a LWS).

Combat climate change by reducing levels of carbon dioxide.

There is a need to minimise per capita CO₂ emissions from transport, and the built environment. In respect of the former, this is a focus of discussion below, under 'Transportation'. In respect of the latter, a key consideration is the need to support larger developments – in excess of 500 homes – where there will be the economies of scale that make delivery of decentralised heat and power generation a possibility.

Policy CS14 (Community Energy Networks and Large Scale Renewable Energy Schemes) of the adopted Core Strategy states: *“Proposals for over 100 homes will be encouraged to consider the use of community energy networks in their development.”* However, in practice viability considerations can be prohibitive, recognising the need to fund/deliver affordable housing and a range of other costly infrastructure (e.g. roads and schools). Neither of the Expansion Areas are delivering an energy network, and whilst Policy CS5 (Strategic Land Allocation, SLA) of the Core Strategy, which allocated the SLA, established policy - *“Consider the use of community energy networks”* – in practice the entire site now has outline planning permission, with no energy network(s) having been proposed.

This being the case, there is only like to be an opportunity to deliver low carbon heat or energy / energy networks as part of one of the **larger schemes**, i.e. a scheme to the east of the M1 or north of MK. The representation received by the promoters of the **North of MK** scheme through the Draft Plan MK consultation stated: *“The North Milton Keynes development offers potential for strategic renewable energy developments to be delivered as part of the scheme. These would be explored further by Gallagher Estates in conjunction with MKC should the site be brought forward through Plan:MK.”*

Conserve and enhance the borough's heritage and cultural assets.

Wavendon Golf Course is perhaps the most constrained of the site options, with evidence of a former parkland landscape and three clusters of listed buildings (ten in total) adjoining the site.

Another constrained site is the WEA Expansion, which would expand the WEA 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', with Lower Weald adjoining Calverton, which has a designated conservation area. The site's 'red line boundary' indicates the potential for coalescence; however, the developer proposals suggest that this can be avoided through greenspace buffers.

The Shenley's Den site is constrained in landscape terms; however, it is not clear to what extent this 'translates' to a heritage constraint. It is not clear that the historic setting of Whaddon, where there is a designated conservation area, would be affected. Whaddon is located on high ground, on the other side of the valley; however, the village is c.1.5km distant and sensitive views may well be screened.

Of the three larger site options, it is the North MK site that is the most constrained, with a number of listed buildings at Haversham and Linford (both of which could be subsumed within the scheme). There are also two other isolated listed buildings, and there is a scheduled monument at Haversham ('Moated site, fishponds and associated earthworks 150m south-east of Haversham Manor'). The scheme could also encroach upon Castlethorpe, where there is a designated conservation area. The two site options to the east of the M1 are notably unconstrained in heritage terms, although a northern scheme could encroach upon Moulsoe and a southern scheme could encroach upon Salford (the northern scheme would also include one listed building). Both of these settlements are associated with a cluster of listed buildings, but no conservation area. In general, given the amount of land area available, there can be confidence in the ability to mitigate heritage impacts through masterplanning.

Conserve and enhance the borough's landscapes.

Taking sites in size order –

- **Wavendon Golf Course** - subject to a degree of constraint, with 'medium' landscape sensitivity (including due to evidence of a former parkland landscape).
- **WEA Expansion** - would extend the WEA 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 site is in two parts, with intervening land outside the control of the developer.
- **Shenley's Den Farm** - would lead to significant impacts to a landscape defined as having 'high' sensitivity. 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."*
- **South East of MK** - 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').
- **Eastern Broad Area** - subject to a degree of constraint, with 'medium' landscape sensitivity.
- **East of the M1 (both north and south)** – not all of this land is covered by the Landscape Capacity Study; however, it seemingly is subject to relatively low constraint.
- **North of MK** - not all of this land is covered by the Landscape Capacity Study; however, it apparent that there would be impacts to the Great Ouse Valley, which is a sensitive landscape, and other land within the site comprises rolling hills.

Encourage efficient use of **natural resources** (inc. land/soils).

A significant consideration is to take into account the economic and other benefits of 'best and most versatile' (BMV) agricultural land, which the NPPF defines as that which is classified as either grade 1, grade 2 or grade 3a, according to the national agricultural land classification.

The 'Agricultural Land Classification Provisional (England)' dataset, available at magic.gov.uk, shows the majority of agricultural land around the edge of MK to be 'grade 3', with some notable patches of higher quality 'grade 2' land to the north of MK. However, this data-set is of a very low resolution (e.g. not all of MK is recognised as being 'urban' on the map), and hence is not suitable for differentiating sites. Also, the dataset does not distinguish between 'grade 3a' and 'grade 3b'.

The most reliable dataset is the 'Post 1988 Agricultural Land Classification (England) dataset, also available at magic.gov.uk, which is suitable for differentiating site options, and does distinguish between grade 3a and grade 3. However, because surveying land using the 'post 1988' criteria involves fieldwork, the data is very patchy.

The only sites to have been surveyed in full are: A) **South East of MK** which is shown to comprise mostly BMV land (including some grade 2); and B) **WEA Expansion** which is shown to comprise non BMV (grade 4) land. It is also noted that land adjacent to the East of M1 (north) site has been surveyed, with some evidence of best and most versatile agricultural land.

[Finally, it is noted that two **employment site options** have been surveyed using the 'Post 1988' methodology. Specifically, the Caldecotte South site has been surveyed and found to comprise non BMV (grade 4) land, whilst the site to the south of Newport Pagnell (Triangle of land between the M1, A422 and Willen Rd) is shown to comprise BMV (grade 2) land.

Limit noise pollution.

It is fair to conclude that sites adjacent to the M1 could be constrained by noise pollution, albeit there will be good potential to avoid/mitigate effects, through bunds/barriers and also building design measures. Noise pollution from the M1 could constrain the two **East of M1** sites, and also the **Eastern Broad Area**.

The **South East MK** site could also be similarly constrained, if not more so, recognising the existing railway (along which the frequency of trains will increase significantly, over the course of the plan period), and the possibility of the Oxford to Cambridge Expressway passing through the site (N.B. this is highly uncertain).

Limit and reduce road congestion and encourage sustainable transportation.

The three **larger sites** are all less than ideal, from a perspective of wishing to minimise car dependency / distance travelled by car, and also minimise traffic congestion. All would be some distance from CMK, with barriers to movement (the M1 or the Great Ouse Valley / Linford Lakes), with the East of M1 (north) site potentially preferable on the basis of there being an existing motorway junction, two existing road bridges over the motorway (and a footbridge) and the potential to support delivery of a mass transit route (e.g. rapid bus service) linking CMK and Cranfield University).

However, conversely, all of these sites are large enough to deliver mixed communities, to include shops, services/facilities and/or employment, in addition to housing. As such, there will be a degree of self-containment, i.e. there will be good potential to minimise longer trips by private car.

With regards to the other, smaller site options, sites to the south-east benefit from proximity to existing train stations, whilst sites to the west benefit from relative proximity to CMK, and the **Shenley's Den** site notably benefits from direct access to an existing grid road.

Maintain and improve water quality and minimise the risk of flooding.

A number of the site options are constrained by fluvial flood risk to some extent; however, in all cases it is fair to assume that vulnerable development (e.g. housing) would avoid the flood risk zone. Notably –

- East of MK (north) is significantly constrained by the River Ouzel, which flows through the centre of the site. The representation received from the site promoter, through the Draft Plan MK consultation (2017) states: *“The development proposals do include new roads across the flood plain of the River Ouzel. Subject to appropriate design and mitigation these are acceptable uses within Flood Zones 2 and 3. With appropriate designs for clear spans, flood relief culverts and associated earthworks the roads would not impede flood flow or increase flood levels within the flood plain. On this basis the EA has previously confirmed that it has no objection in principle.”*
- North of MK would involve ‘leapfrogging’ the extensive area of flood risk associated with the Great Ouse valley / Linford Lakes.
- East of MK (south) is constrained by two streams. The location of these streams could make effective masterplanning a challenge.
- There are also possibly some ‘offsite flood risk’ concerns associated with the two site options to the west of MK. Specifically, there is a need to bear in mind the risk of increased surface water runoff into the stream that lies to the west, at the foot of the hill, which then flows north through Lower Weald. Sustainable Drainage Systems (SuDS) have been designed into the WEA scheme, in accordance with policy (“Measures to reduce the risk of flooding in Lower Weald”) and so there is a need to consider the effect of further expansion on the functioning/effectiveness of the SuDS.

The matter of ‘wastewater services’ is another ‘water’ issue of relevance to the spatial strategy. In particular, there is a need to direct growth to locations where there is capacity at Wastewater Treatment Works (WwTWs), or where there is confidence regarding the potential to increase capacity sufficiently. A recent Water Cycle Study (2017) establishes that the MK urban area drains to the Cotton Valley WwTW, to the east, which has headroom capacity, but to a limited extent. The conclusion is reached that, in order to ensure that the use of available permitted headroom does not impact on downstream water quality objectives (ammonia, BOD and phosphate are key considerations), changes to the quality permit are required, and upgrades may be required, which may have phasing implications. It may be the case that significant growth to the north would drain to the Castlethorpe WwTW; however, this is not certain.

Reduce **waste** generation and encourage sustainable waste management.

This objective is not applicable to the current appraisal. It should be possible to manage waste sustainably under any reasonably foreseeable scenario. It is noted that the MK North and East of M1 (north) sites would benefit from being in proximity to a household waste recycling centre; however, this is not thought to have a significant bearing on the achievement of sustainable waste management objectives.

Encourage the creation of new businesses.

Sustain **economic growth** and enhance competitiveness.

Ensure high and stable levels of **employment**.

The three headings above are considered together, recognising that a key consideration is the potential to deliver new employment land alongside housing.

The Council's Employment Land Study (2017) considers requirements and then existing supply, in order to inform a decision on whether / how much employment land must be allocated through Plan MK in order to meet requirements. The table below summarises the requirements. One requirement is calculated by Experian and the using the East of England Forecasting Model (EEFM).

Employment Land Requirements in the Borough of Milton Keynes 2016-2031.

Category of Floorspace	Experian (ha)	EEFM (ha)
Office	17	18
Industrial	12	2
Warehouse	104	66
Total	132	87

As can be seen, the need for warehousing is considerably higher than the need for office space or industrial space. The need for office space and industrial space is met by the existing supply.

Focusing on warehousing, the existing supply totals 56.5 ha (Eagle Farm North, 35.8 ha; Pineham, 10.9 ha; and Glebe lands, 9.8 ha), which means that Plan MK must allocate between 9.5ha (66-56.5 ha) and 47.5 ha (104-56.5). MK is a pro-growth authority, and so the higher figure is broadly supported.

None of the smaller MK edge site options would deliver warehousing; however, warehousing could be delivered, alongside housing, at the three larger sites. In particular, the location of the two sites to the East of M1 implies good potential to deliver warehousing. The potential for the North of MK site to link well to the M1, and therefore be an attractive location for warehousing, is less clear.

The potential to deliver warehousing is an argument in favour of allocating one of the three larger sites; however, however, it is noted that Plan MK is not necessarily reliant on new employment land at one of these sites, in order to meet the requirement. This is on the basis that there is another employment only site, at Caldecotte South, that could potentially be allocated in order to deliver the requirement.

APPENDIX IV – REASONABLE SPATIAL STRATEGY ALTERNATIVES

Introduction

As explained within ‘Part 1’ above, a focus of work has been on the development and appraisal of spatial strategy alternatives, with a view to informing determination of the preferred strategy.

The aim of this appendix is to present appraisal findings.

The reasonable 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
Total supply	27,580	28,180	29,080	29,080	29,680	29,680	30,580	30,580
Target buffer	4%	6%	10%	10%	12%	12%	15%	15%
Employment land allocation	S. C'decotte	S. C'decotte	E of M1	S. C'decotte	E of M1	S. C'decotte	E of M1	E of M1

Appraisal methodology

For each of the options, the assessment examines ‘likely significant effects’ on the baseline, drawing on the sustainability objectives identified through scoping (see Table 4.1) as a methodological framework.

Green is used to indicate significant positive effects, whilst **red** is used to indicate significant negative effects. Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policy approaches under consideration. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a ‘no plan’ scenario). In light of this, there is a need to make considerable assumptions regarding how scenarios will be implemented ‘on the ground’ and what the effect on particular receptors will be.²⁷ Where there is a need to rely on assumptions in order to reach a conclusion on a ‘significant effect’ this is made explicit in the appraisal text.

Where it is not possible to predict likely significant effects on the basis of reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a **rank of preference**. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of ‘significant effects’.

Finally, it is important to note that effects are predicted taking into account the criteria presented within Regulations.²⁸ So, for example, account is taken of the duration, frequency and reversibility of effects. Cumulative effects are also considered (i.e. where the effects of the plan in combination with the effects of other planned or on-going activity that is outside the control of Plan:MK).

²⁷ Considerable assumptions are made regarding infrastructure delivery, i.e. assumptions are made regarding the infrastructure (of all types) that will come forward in the future alongside (and to some extent funded through) development.

²⁸ Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004.

Appraisal findings

Appraisal findings are presented below within 17 separate tables (each table dealing with a specific sustainability objective, or combination of objectives) with a final table drawing conclusions.

The appraisal methodology is explained above, but to reiterate: For each sustainability topic the performance of each scenario is categorised in terms of ‘significant effects (using red / green) and also ranked in order of preference. Also, ‘ = ’ is used to denote instances of all alternatives performing on a par.

Reduce levels of crime and create vibrant communities

	Opt 1	Opt 2	Opt 3	Opt 4	Opt 5	Opt 6	Opt 7	Opt 8
Rank	2	3	2	2	3	3	★1	3
Significant effects?	No							
Discussion	<p>A primary consideration is the need to support larger schemes, which are able to deliver strategic community infrastructure. This in turn leads to a suggestion that there is merit to focusing growth to the greatest extent. In particular, a focus of growth involving a large mixed use scheme to the east of the M1 (Option 7 would involve 3,000 in the plan period, with the likelihood of further growth beyond the plan period) could well secure a new secondary school.</p> <p>Another important consideration relates to access to open space in the urban area. Options 3, 5 and 6 would all involve development of a number of greenspaces within the urban area, which whilst arguably ‘underused’ by some measures, will tend to be valued by local communities nonetheless.</p> <p>One other consideration is the need to manage the pace of growth to the east of MK, recognising the scale of recent and committed growth at the Eastern Expansion Area and at the Strategic Land Allocation. Construction works, and associated traffic, will have an impact on amenity, and there is also a need to enable new services and facilities to ‘bed in’. This factor potentially serves as an argument for supporting a phasing of growth at South East MK; however, this is very uncertain.</p> <p>In conclusion, on balance there is support for a concentration of growth to the East of the M1; however, there is some uncertainty regard, given distance to CMK and severance caused by the M1). As such, significant positive effects are not predicted. Options involving high growth within the urban area are judged to perform less well; however, significant negative effects are not predicted.</p>							

Reduce the gap between the most deprived areas of Milton Keynes and the average.

	Opt 1	Opt 2	Opt 3	Opt 4	Opt 5	Opt 6	Opt 7	Opt 8
Rank	=	=	=	=	=	=	=	=
Significant effects?	No							
Discussion	<p>The Index of Multiple Deprivation (2015) dataset shows a band over more deprived areas running through MK, from north to south, with Bletchley and Wolverton being two established regeneration priority areas at either end of this ‘band’. However, neither the SE MK or East of M1 strategic urban extensions would have a direct bearing on these areas. Similarly, it is difficult to conclude that higher growth in the urban area would have an effect. In conclusion, the alternatives are judged to perform broadly on a par.</p>							

Improve education attainment and qualification...so that everyone can find and stay in work

	Opt 1	Opt 2	Opt 3	Opt 4	Opt 5	Opt 6	Opt 7	Opt 8
Rank	2	3	2	2	3	3	★1	3
Significant effects?	No							
Discussion	<p>The matter of delivering new schools - both primary and secondary - is discussed above, under the 'Communities' heading, with it noted that East of M1 strategic urban extension (delivery not certain at this stage) would deliver a secondary school, whilst there is no equivalent proposal for the SE MK strategic urban extension. Initial indications are that a new (relatively small) secondary school would be needed at SE MK, 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 & SD11).</p> <p>In conclusion, the performance of the alternatives is broadly as per the discussion above, under 'Communities'. With regards to effect significance, there could feasibly be a risk of significant negative effects; however, there is no certainty at this stage. It may well prove possible to deliver the required secondary school capacity as part of a SE MK development.</p>							

Protect and improve residents' health and reduce health inequalities

	Opt 1	Opt 2	Opt 3	Opt 4	Opt 5	Opt 6	Opt 7	Opt 8
Rank	2	3	2	2	3	3	★1	3
Significant effects?	No							
Discussion	<p>The matter of delivering new community infrastructure is discussed above, under the 'Communities' heading, with the conclusion reached that there is a strong argument for supporting larger scale new developments, which will deliver community infrastructure.</p> <p>Both of the urban extension site options under consideration would be of a scale sufficient to deliver a local centre, as part of which there could potentially be a doctor's surgery; however, any decision to deliver a new surgery would need to be made in consultation with the Milton Keynes Clinical Commissioning Group (CCG).</p> <p>Matters of access to open space - which have been discussed above, including under the 'Communities' heading, are also of relevance, as access to open space is an important determinant of health.</p> <p>In conclusion, the alternatives perform broadly as per the discussion above, under the 'Communities' heading. Significant effects are not predicted, recognising the wide ranging nature of health determinants.</p>							

Ensure that everyone has the opportunity to live in an affordable, sustainably constructed home

	Opt 1	Opt 2	Opt 3	Opt 4	Opt 5	Opt 6	Opt 7	Opt 8
Rank	7	6	4	5	2	3	★ 1	★ 1
Significant effects?	Yes							
Discussion	<p>Options 7 and 8 perform well in the sense these are the high growth options. Either option would involve providing for 30,579 homes, i.e. a figure 15% above the 26,500 home target. Provision of this 'buffer' would help to ensure that Objectively Assessed Housing Needs (OAHN) are met in practice, recognising the likelihood of unforeseen deliverability issues, i.e. one or more sites not delivering at the anticipated rate. Providing for a contingency is an important element of Local Plan-making. As stated within the National Planning Policy Framework (NPPF): <i>"Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change."</i></p> <p>Indeed, with a large (15%) buffer it is possible to assume that the effect would be to make provision for delivering above the OAHN figure. None of MK's neighbouring authorities have requested that Plan MK provide for unmet needs (the typical reason for providing for 'above OAHN', e.g. this is the reason why the Vale of Aylesbury and Central Beds Local Plans are proposing to provide for above OAHN); however, providing for above OAHN could have merit as an option, nonetheless. Specifically, there is an argument for providing for a 'above OAHN' in order to ensure that the need for affordable housing is met. The SHMA identifies a need for 8,200 affordable homes, not taking account of any losses from the current stock (such as demolition or clearance, or sales through Right to Buy). Were Plan MK to provide for the 26,500 home OAHN figure, then 31% of homes delivered would need to be affordable; however, there are concerns regarding the ability to achieve above 30%, given viability issues.</p> <p>Of the 1,246 completions in the 2016/2017 monitoring year, only 20.1% were affordable; and the 16,734 permissions are set to deliver only 27.7%. The implication is that there could be a need to provide for 'above OAHN' in order to meet the 8,200 affordable homes target. Much depends on the findings of detailed viability work to examine the financial burdens placed on house-builders, including the need to provide for other types of housing (Starter Homes, Build to Rent, Self-build) that impact the ability to provide for affordable housing.</p> <p>A second, equally important consideration is the need to provide for a good mix of housing sites, recognising the need to ensure not only the delivery of 26,500 homes within the plan period, but also a steady 'trajectory' of housing delivery across the entire plan period (such that there is a rolling 'five year housing land supply'). Linked to this, there is a need to support smaller housing sites that are in turn suited to development by small/medium sized housebuilders, as this diversity can add resilience and in turn help to prevent unforeseen dips in the housing trajectory.</p> <p>This being the case, there is an argument for allocating both of the urban extension options and/or supporting higher growth in the urban area. There is a need to avoid over-reliance on either of the urban extension options, given the deliverability risks that exist –</p> <ul style="list-style-type: none"> • East of M1 - is inherently associated with delivery risks, given the likely need for costly major infrastructure upgrades (albeit the site benefits from proximity to M1 J14, two existing road bridges and a footbridge). 							

<ul style="list-style-type: none"> • South East MK - there is the potential for a new dual carriageway road to be delivered through the site, as part of the Oxford to Cambridge Expressway. There is no certainty, as the preferred route for the Expressway is yet to be selected; however, it is apparent that if either of the two northern broad route options was to be selected (there are three options in total), then there could well be a need for a new road through the site. Were there to be a need for a new road through the site, then it would need to be delivered ahead of housing, and there could be a risk of delay to the road in turn leading to delay to the housing. <p>In conclusion, an overriding consideration relates to the extent of the contingency / buffer that is put in place, recognising the need to ensure that OAHN is provided for in practice, and also the objective of providing for ‘above OAHN’ in order to more fully meet affordable housing needs. Housing mix is a very important, but secondary consideration. On this basis, the order of preference assigned to the alternatives primarily reflects the quantum of homes provided for.</p> <p>With regard to effect significance, it is fair to conclude that all alternatives would result in significant positive effects, as the Local Plan would provide for the District’s OAHN figure, plus a contingency.</p>

Ensure all section of the community have good access to services and facilities

	Opt 1	Opt 2	Opt 3	Opt 4	Opt 5	Opt 6	Opt 7	Opt 8
Rank	2	3	2	2	3	3	★ 1	3
Significant effects?	No							
Discussion	<p>The matter of delivering new community infrastructure is discussed above, under the ‘Communities’ heading, with the conclusion reached that there is a strong argument for supporting larger scale new developments, which will deliver community infrastructure.</p> <p>Both of the urban extension site options under consideration would be of a scale sufficient to deliver a local centre, as part of which there could potentially be a range of services / facilities.</p> <p>In conclusion, the alternatives perform broadly as per the discussion above, under the ‘Communities’ heading. Significant effects are not predicted, ahead of further detailed work on masterplanning etc.</p>							

Maintain and improve the air quality in the borough

	Opt 1	Opt 2	Opt 3	Opt 4	Opt 5	Opt 6	Opt 7	Opt 8
Rank	★ 1	★ 1	2	★ 1	2	★ 1	2	2
Significant effects?	No							
Discussion	<p>There are no designated Air Quality Management Areas (AQMA) within Milton Keynes; however, 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 an AQMA might need to be designated). See further discussion below, under ‘Transportation’.</p>							

Conserve and enhance the borough’s **biodiversity**.

	Opt 1	Opt 2	Opt 3	Opt 4	Opt 5	Opt 6	Opt 7	Opt 8
Rank	=	=	=	=	=	=	=	=
Significant effects?	No							
Discussion	<p>Neither of the urban extension sites in question could be described as highly constrained in biodiversity terms, although both are associated with certain issues -</p> <ul style="list-style-type: none"> • South East MK – the site is in close proximity to the extensive woodlands associated with the Greensand Ridge, much of which is ancient woodland designated as a Local Wildlife Site (LWS); however, it is not clear that this is necessarily a significant constraint. Residents would benefit from ‘access to nature’ (there are footpath links), and the woodlands are not known to be at risk of impacts from an increase in recreational pressure. • East of the M1 (north) – the River Ouzel passes north/south through the site, which is associated with some mature trees and other riparian habitat. It forms part of the MK green infrastructure network (although it is noted that there is no footpath along the river). <p>There is also a need to consider the biodiversity value of the additional urban openspace sites that would be allocated under Options 2, 5 and 6. The general view is that most, if not all, will have limited biodiversity value; however, there is some uncertainty at the current time, ahead of the completion of current work to examine the contribution of open space sites to green infrastructure at the Milton Keynes scale. An initial view is that the open space sites in question (i.e. those that would be allocated under Options 2, 5 and 6) tend to be isolated patches, not likely to function as part of an ecological network.</p> <p>In conclusion, it is difficult to differentiate the alternatives in respect of biodiversity. The sites in question are all relatively unconstrained, and so it is difficult to conclude that supporting higher growth is a ‘negative’, from a biodiversity perspective. Significant effects are not predicted.</p>							

Combat **climate change** by reducing levels of carbon dioxide.

	Opt 1	Opt 2	Opt 3	Opt 4	Opt 5	Opt 6	Opt 7	Opt 8
Rank	=	=	=	=	=	=	=	=
Significant effects?	No							
Discussion	<p>There is a need to minimise per capita CO₂ emissions from transport, and the built environment. In respect of the former, this is a focus of discussion below, under ‘Transportation’. In respect of the latter, a key consideration is the need to support larger developments – in excess of 500 homes – where there will be the economies of scale that make delivery of decentralised heat and power generation a possibility.</p> <p>Policy CS14 (Community Energy Networks and Large Scale Renewable Energy Schemes) of the adopted Core Strategy states: “Proposals for over 100 homes will be encouraged to consider the use of community energy networks in their development.” However, in practice viability considerations can be prohibitive, recognising the need to fund/deliver affordable housing and a range of other costly infrastructure (e.g. roads and schools). Neither of the Expansion Areas are delivering an energy network, and whilst Policy CS5 (Strategic Land Allocation, SLA) of the Core Strategy, which allocated the SLA, established policy - “Consider the use of community energy networks” – in practice the entire site now has outline planning permission, with no energy network(s) having been proposed.</p>							

	<p>This being the case, there is only like to be an opportunity to deliver low carbon heat or energy / energy networks as part of the East of M1 scheme.</p> <p>In conclusion, options involving the East of M1 are supported. The assumption is that this would negate the need to allocate the Caldecotte South site; however, it is recognised that there would be the option to allocate this site as well, in order to ensure sufficient flexibility in the employment land supply. Significant positive effects are not predicted, recognising that climate change mitigation is a global issue (i.e. local actions can have only a limited effect).</p>
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Conserve and enhance the borough's **heritage** and cultural assets.

	Opt 1	Opt 2	Opt 3	Opt 4	Opt 5	Opt 6	Opt 7	Opt 8
Rank	=	=	=	=	=	=	=	=
Significant effects?	No							
Discussion	<p>Neither of the urban extension sites in question could be described as highly constrained in heritage terms, an East of M1 scheme could encroach upon Moulsoe (and would include one listed building). Moulsoe is associated with a cluster of listed buildings, but no conservation area. In general, given the amount of land area available, there can be confidence in the ability to mitigate heritage impacts through masterplanning.</p> <p>There is also a need to consider the heritage value of the additional urban openspace sites that would be allocated under Options 2, 5 and 6. The general view is that most, if not all, will have limited heritage value; however, there is some uncertainty at the current time, ahead of the completion of current work to examine the contribution of open space sites to green infrastructure at the Milton Keynes scale. An initial view is that the open space sites in question (i.e. those that would be allocated under Options 2, 5 and 6) will have been established at the time of residential areas being built-out, rather than at the time of high level planning for MK.</p> <p>In conclusion, it is difficult to differentiate the alternatives in respect of heritage. The sites in question are all relatively unconstrained, and so it is difficult to conclude that supporting higher growth is a 'negative', from a heritage perspective. Significant effects are not predicted.</p>							

Conserve and enhance the borough's **landscapes**.

	Opt 1	Opt 2	Opt 3	Opt 4	Opt 5	Opt 6	Opt 7	Opt 8
Rank	=	=	=	=	=	=	=	=
Significant effects?	No							
Discussion	<p>Neither of the urban extension sites in question could be described as highly constrained in landscape terms. South East MK has 'low' sensitivity, according to the Landscape Capacity Study (2016), and whilst the study does not examine all of the East of M1 site, the general view is that the landscape in this area is relatively non-sensitive.</p> <p>Another consideration is sensitivity associated with the 'South of Caldecotte' site, which would be delivered for employment under Options 1, 2, 5 and 6. The Landscape Sensitivity Study identifies this site as falling within a parcel of land with 'medium' sensitivity; however, this conclusion may relate more to land to the south (Eaton Leys, which is now a committed housing site), rather than to the Caldecotte South site. The study explains that: <i>"Residential development could not be accommodated without affecting key characteristics and/or values in the landscape. The area suffers from visual and auditory intrusion from the transport network."</i></p> <p>There is also a need to consider the landscape value of the additional urban openspace sites</p>							

that would be allocated under Options 2, 5 and 6. The general view is that most, if not all, will have limited landscape value, albeit it is recognised that some (if not all) may have a considerable amenity value.

In **conclusion**, it is difficult to differentiate the alternatives in respect of landscape. The sites in question are all relatively unconstrained, and so it is difficult to conclude that supporting higher growth is a 'negative', from a heritage perspective. Significant effects are not predicted.

Encourage efficient use of **natural resources** (inc. land/soils).

	Opt 1	Opt 2	Opt 3	Opt 4	Opt 5	Opt 6	Opt 7	Opt 8
Rank	=	=	=	=	=	=	=	=
Significant effects?	Yes							
Discussion	<p>A significant consideration is the need to take into account the value of 'best and most versatile' (BMV) agricultural land, which the NPPF defines as that which is classified as either grade 1, grade 2 or grade 3a, according to the national agricultural land classification.</p> <p>The 'Agricultural Land Classification Provisional (England)' dataset, available at magic.gov.uk, shows the majority of agricultural land around the edge of MK to be 'grade 3'. However, this data-set is of a very low resolution (e.g. not all of MK is recognised as being 'urban' on the map), and hence is not suitable for differentiating sites. Also, the dataset does not distinguish between 'grade 3a' and 'grade 3b'.</p> <p>The most reliable dataset is the 'Post 1988 Agricultural Land Classification (England) dataset, also available at magic.gov.uk, which is suitable for differentiating site options, and does distinguish between grade 3a and grade 3. However, because surveying land using the 'post 1988' criteria involves fieldwork, the data is very patchy. Findings are -</p> <ul style="list-style-type: none"> • South East of MK comprises mostly BMV land (including some grade 2); • Caldecote South has been surveyed and found to comprise non BMV (grade 4) land • Land adjacent to the East of M1 site has been surveyed, with some evidence of BMV. <p>In conclusion, the main issue relates to the South East MK site, but this site would eventually be developed in full under all alternatives. Given allocation of the South East MK site, all alternatives are predicted to result in significant negative.</p>							

Limit **noise pollution**.

	Opt 1	Opt 2	Opt 3	Opt 4	Opt 5	Opt 6	Opt 7	Opt 8
Rank	★ 1	★ 1	2	★ 1	2	★ 1	2	2
Significant effects?	No							
Discussion	<p>It is fair to conclude that sites adjacent to the M1 could be constrained by noise pollution, albeit there will be good potential to avoid/mitigate effects, through bunds/barriers and also building design measures; and the South East MK site could also be similarly constrained, if not more so, recognising the existing railway (along which the frequency of trains will increase significantly, over the course of the plan period), and the possibility of the Oxford to Cambridge Expressway passing through the site (N.B. this is highly uncertain).</p> <p>In conclusion, options involving the East of M1 (in addition to South East MK) site are judged to perform relatively poorly; however, this conclusion is reached with considerable uncertainty. Significant negative effects are not predicted.</p>							

Limit and reduce road congestion and encourage sustainable **transportation.**

	Opt 1	Opt 2	Opt 3	Opt 4	Opt 5	Opt 6	Opt 7	Opt 8
Rank	★ 1	★ 1	2	★ 1	2	★ 1	2	2
Significant effects?	No							
Discussion	<p>Modelling work has been completed (AECOM, 2017) to examine the effect of Plan:MK housing growth on the traffic baseline in 2031 (recognising that the baseline, or ‘reference case’, will involve significant housing growth, given the commitments that are in place). Several scenarios are examined, primarily varying in respect of the approach to growth at South East MK and East of the M1. The model assumes that key infrastructure would be delivered at each urban extension site – notably bridges over the railway and M1 respectively – but otherwise assumes nil mitigation, i.e. does not assume investment in offsite infrastructure upgrades over-and-above upgrades that are already committed. Notable conclusions are –</p> <ul style="list-style-type: none"> • South East MK – the conclusions reached for Scenario 2a are of particular note, as this scenario involves maximum growth here (relative to Scenario 1, which involves lower growth). The conclusion is reached that: <i>“Although there is significant extra housing growth, the impacts are mitigated by the new link between H10 and Bow Brickhill Road bridging the railway line just to the west of Woburn Sands, and the additional road network linking H10 through to A5130 (Newport Road).”</i> Another notable conclusion is that: <i>“Scenario 2a has little impact on Bow Brickhill level crossing, in terms of flow and delay with a maximum flow circa 900 PCU using the crossing which is within an acceptable volume for the crossing to accommodate given the train service frequency assumed.”</i> • East of the M1 - the conclusions reached for Scenario 2b are of particular note, as this scenario involves maximum growth here (relative to other scenarios, which involve nil or lower growth). The conclusion is reached that: <i>“The new road bridge is predicted to take a significant volume of flow (1500-1700 PCU in the direction of peak tidal flow), which helps mitigate the impact of the East of M1 development. In the AM Peak there is still an increase in flow crossing J14 towards Milton Keynes of around 250 PCU, however the model is showing little impact in delay at J14, partly due to addition of the dual carriageway link on southbound approach alleviating a current pinch point.”</i> <p>Focusing on the potential East of M1 scheme, it is noted that there is the potential to support delivery of a fast mass-transit system connecting CMK and Cranfield University. Also, the scale of the site should also mean excellent potential to deliver mixed communities, to include shops, services/facilities and employment, in addition to housing, leading to a degree of self-containment. <i>However</i>, in other respects it is fair to conclude that growth to the East of the M1 is less than ideal, from a perspective of wishing to minimise car dependency / distance travelled by car, and also minimise traffic congestion. The site would be some distance from CMK, with clear barriers to movement (the M1).</p> <p>As for South East MK, this is an accessible location, including on the basis of proximity to an existing train station at Bow Brickhill. Similarly, the additional urban open space sites that would be allocated under Options 2, 5 and 6 are broadly supported.</p> <p>In conclusion, options involving the East of M1 (in addition to South East MK) site are judged to perform relatively poorly; however, this conclusion is reached with considerable uncertainty. Significant negative effects are not predicted.</p>							

Maintain and improve **water** quality and minimise the risk of flooding.

	Opt 1	Opt 2	Opt 3	Opt 4	Opt 5	Opt 6	Opt 7	Opt 8
Rank	★ 1	★ 1	2	★ 1	2	★ 1	2	2
Significant effects?	No							
Discussion	<p>The East of M1 site is significantly constrained by the River Ouzel, which flows through the centre of the site. The representation received from the site promoter, through the Draft Plan MK consultation (2017) states: “The development proposals do include new roads across the flood plain of the River Ouzel. Subject to appropriate design and mitigation these are acceptable uses within Flood Zones 2 and 3. With appropriate designs for clear spans, flood relief culverts and associated earthworks the roads would not impede flood flow or increase flood levels within the flood plain. On this basis the EA has previously confirmed that it has no objection in principle.”</p> <p>The matter of ‘wastewater services’ is another ‘water’ issue of relevance to the spatial strategy. In particular, there is a need to direct growth to locations where there is capacity at Wastewater Treatment Works (WwTWs), or where there is confidence regarding the potential to generate capacity through upgrade works. A recent Water Cycle Study (2017) establishes that the MK urban area drains to the Cotton Valley WwTW, to the east, which has headroom capacity, but to a limited extent. The conclusion is reached that, in order to ensure that the use of available permitted headroom does not impact on downstream water quality objectives (ammonia, BOD and phosphate are key considerations), changes to the quality permit are required, and upgrades may be required, which may have phasing implications.</p> <p>In conclusion, options involving the East of M1 (in addition to South East MK) site are judged to perform relatively poorly; however, this conclusion is reached with considerable uncertainty. Significant negative effects are not predicted.</p>							

Reduce **waste** generation and encourage sustainable waste management.

	Opt 1	Opt 2	Opt 3	Opt 4	Opt 5	Opt 6	Opt 7	Opt 8
Rank	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Significant effects?	No							
Discussion	<p>This objective is not applicable to the current appraisal. It should be possible to manage waste sustainably under any reasonably foreseeable scenario. It is noted that the MK North and East of M1 (north) sites would benefit from being in proximity to a household waste recycling centre; however, this is not thought to have a significant bearing on the achievement of sustainable waste management objectives.</p>							

Encourage the creation of new **businesses**; Sustain economic **growth** and enhance competitiveness; Ensure high and stable levels of **employment**.

	Opt 1	Opt 2	Opt 3	Opt 4	Opt 5	Opt 6	Opt 7	Opt 8															
Rank	2	2	★1	2	★1	2	★1	★1															
Significant effects?	Yes																						
Discussion	<p>The three headings above are considered together, recognising that a key consideration is the potential to deliver new employment land alongside housing.</p> <p>The Council's Employment Land Study (2017) considers requirements and then existing supply, in order to inform a decision on whether / how much employment land must be allocated through Plan MK in order to meet requirements. The table below summarises the requirements. One requirement is calculated by Experian and the using the East of England Forecasting Model (EEFM).</p> <p>Employment Land Requirements in the Borough of Milton Keynes 2016-2031.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Category of Floorspace</th> <th>Experian (ha)</th> <th>EEFM (ha)</th> </tr> </thead> <tbody> <tr> <td>Office</td> <td>17</td> <td>18</td> </tr> <tr> <td>Industrial</td> <td>12</td> <td>2</td> </tr> <tr> <td>Warehouse</td> <td>104</td> <td>66</td> </tr> <tr> <td>Total</td> <td>132</td> <td>87</td> </tr> </tbody> </table>								Category of Floorspace	Experian (ha)	EEFM (ha)	Office	17	18	Industrial	12	2	Warehouse	104	66	Total	132	87
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	Total	132	87																				
<p>As can be seen, the need for warehousing is considerably higher than the need for office space or industrial space. The need for office space and industrial space is met by the existing supply.</p> <p>Focusing on warehousing, the existing supply totals 56.5 ha (Eagle Farm North, 35.8 ha; Pineham, 10.9 ha; and Glebe lands, 9.8 ha), which means that Plan MK must allocate between 9.5ha (66-56.5 ha) and 47.5 ha (104-56.5). MK is a pro-growth authority, and so the higher figure is broadly supported.</p> <p>East of M1 would deliver warehousing. The site is accessible from the M1, and therefore an attractive location for warehousing.</p> <p>However, warehousing could also be delivered under spatial strategy options not involving growth to the East of the M1. This is on the basis that Caldecotte South is being promoted for, and could deliver this type of housing. The site is not as well linked to the M1, but on a strategic transport corridor nonetheless, and indeed a transport corridor that is a national focus of growth (the Oxford to Cambridge Corridor).</p> <p>In conclusion, higher growth options involving the East of M1 are supported. The assumption is that this would negate the need to allocate the Caldecotte South site; however, it is recognised that there would be the option to allocate this site as well, in order to ensure sufficient flexibility in the employment land supply. Significant positive effects are predicted for all alternatives, recognising that targets would be met.</p>																							

Table 7.1: Summary spatial strategy 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	3	3	3	★1	3
Deprivation	=	=	=	=	=	=	=	=
Education	2	3	2	3	3	3	★1	3
Health	2	3	2	3	3	3	★1	3
Homes	7	6	4	5	2	3	★1	★1
Services	2	3	2	3	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	★1

Topic	Rank of performance / categorisation of effects							
	Opt 1	Opt 2	Opt 3	Opt 4	Opt 5	Opt 6	Opt 7	Opt 8
Conclusion								
<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"> • 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"> – 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). • 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. • 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). <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>								