



MILTON KEYNES COUNCIL: EXAMINATION OF PLAN:MK.

Response on behalf of the Guinness Partnership. Representor ID147068.

Matter 1: Legal requirements and the Duty to Co-operate

Q1.1 Is the Plan compliant with the Planning and Compulsory Purchase Act (2004) (as amended) and the 2012 Regulations? In particular, is the Plan compliant with the Local Development Scheme and the Statement of Community Involvement?

- 1.1 No. Note 2 on page 2 of the current Local Development Scheme (LDS) (MK/Mis/003) indicates that Plan:MK **“will replace the existing 2005 Milton Keynes Local Plan and the 2013 Core Strategy.”** This replacement of all policies in the 2005 Milton Keynes Local Plan and the Core Strategy is not replicated in Appendix H of the Submission Plan.
- 1.2 To illustrate the non-compliance of Plan:MK with the LDS, Section 1 of “Proposed Submission Plan:MK Policies Map: Schedule of new and deleted designations” (October 2017) (MK/SUB/10) relating to 2005 Local Plan Policy S1 states: **“Areas of Attractive Landscape are no longer being designated or used within Plan:MK for the purposes of considering planning applications. Instead, a criteria-based policy for assessing landscape impacts is being proposed.”**
- 1.3 However, the deletion of the policy is not shown in Appendix H as expected according to the Local Development Scheme. Instead, Policy HN12 of the Submitted Plan refers to Areas of Attractive Landscape as a criterion for assessing proposals.
- 1.4 Appendix H of the Submitted Plan must therefore be updated to ensure it shows how all policies in the 2005 Local Plan and Core Strategy will be replaced upon adoption of Plan:MK. This will ensure consistency of the adopted plan with both the LDS and Regulation 8(5) of The Town and Country Planning (Local Planning) (England) Regulations.

Q1.4 Has the Sustainability Appraisal adequately assessed the likely environmental, social and economic effects of Plan:MK? Does the appraisal demonstrate that the Plan has been tested against all reasonable alternatives? In particular:

- i) Has the inter-relationship of effects, including cumulative impacts, been addressed?
- ii) Is there adequate coverage of all reasonable alternatives (sites and policies)?
- iii) Are reasons for rejecting alternatives and discounting unreasonable options clearly given?
- iv) Is the SA proportionate and relevant in contributing to the evidence base of Plan:MK (NPPF paragraph 167)?

- 1.5 The Sustainability Appraisal accompanying the Submitted Plan (MK/SUB001) does not demonstrate that the Plan has been tested against all reasonable alternatives.
- 1.6 Section 3.6 of the “Levante Gate – A Sustainable Housing Allocation for Milton Keynes” (June 2017) which accompanied our representations to the Proposed Submission Plan, indicates that in preparing the Core Strategy, the authority considered that 2,500 dwellings could be accommodated on land at Eaton Lays, Levante Gate and South of Caldecotte, east of A5 (ref MSKA9) (Extract of Core Strategy SA is included in Appendix 1).
- 1.7 There is no information within the Sustainability Appraisal that site MSKA9 was re-appraised for the potential to accommodate around 2,500 dwellings. This contrasts with other sites appraised for both the Core Strategy and Plan:MK i.e. east of M1 (MKSA2 and south of Mars-ton Vale Line (MKSA8) (see extract of Core Strategy SA included in Appendix 1).
- 1.8 There is no evidence to support the exclusion of MSKA9 from the potential reasonable alternatives for the plan, especially as it was previously considered an appropriate option. Furthermore, whilst Plan:MK allocates 600 dwellings to Eaton Lays (Policies DS2 and SD15) and a minimum of 195,000m² Class B2/B8 floorspace on land south of Milton Keynes in South Caldecotte, this has resulted in the exclusion of the Levante Gate site from allocation. As this was part of the MSKA9 assessed for the Core Strategy, there is no robust evidence demonstrating why the larger MSKA9 area was not re-appraised as an alternative for Plan:MK.
- 1.9 Notwithstanding the exclusion of area MSKA9 as a reasonable alternative, the Sustainability Appraisal (paragraphs 6.2.13 to 6.2.19) (MK/SUB005) recognises that authority’s track record in housing delivery. It notes (first bullet of paragraph 6.2.17) that **“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”**. Paragraph 6.2.18 indicates that options for improving delivery including **“diversifying land allocation thereby catering to all aspects of the market.”**
- 1.10 Paragraph 10.6.3 (MK/SUB/005) with regard to housing emphasises that an **“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.”**
- 1.11 Given the clear recognition in the SA that it is essential to diversify land allocations to increase the number of house builders operating in the area, it is unfortunate that the reasonable option of increasing the allocation of medium sized sites around Milton Keynes was not included. Instead, the SA only assessed the potential of medium sized sites within the current settlement boundary. This The rejection of non-strategic sites surrounding Milton Keynes means that the SA has not considered all reasonable alternatives, particularly given the clear recognition of the delivery failures associated with the current approach. This

therefore compounds the failure to reconsider all options originally appraised for the Core Strategy (Appendix 1).

- 1.12 Table 6.3 of the SA (MK/Sub/005) notes that the medium site of Levante Gate was rejected as it was “**sequentially less preferable to other medium scale site options.**” Table 1 below provides an extract of this table showing the sites which could accommodate at least 350 dwellings (the threshold for small sites according to table 6.3). This indicates that all sites for less than 1,000 dwellings were rejected due to conflicts with neighbourhood plan or the sequential more preferred other locations in the list.

Table 1: Extract of table 6.3 of Sustainability Appraisal

Ref	Name	Capacity	WBP Comment
7	South of Newport Pagnell	500	Rejected as would conflict with Neighbourhood Plan
8	Levante Gate	625	Rejected as other medium sites sequential preferred
9	Wavendon Golf Course	700	Table 6.4 indicates that this site is sequential less preferable to SE MK.
10	Caldecotte South	994	Earmarked for employment
11	WEA Expansion	1,000	Site of 1,000 dwellings or more
12	Shenley's Den Farm	1,500	Site of 1,000 dwellings or more
13	Wavendon / Woburn ('eastern') broad area	1,500+	Site of 1,000 dwellings or more
14	South East MK	3,000	Site of 1,000 dwellings or more
15	East of M1 (north)	3,000+	Site of 1,000 dwellings or more
16	East of M1 (south)	3,000+	Site of 1,000 dwellings or more
17	North of MK	3,000+	Site of 1,000 dwellings or more

- 1.13 However, in making the choice for large strategic sites, the authority has ignored the concerns expressed in the SA (paragraph 6.2.13-6.2.18) regarding the track record of housing delivery. Our concerns regarding Milton Keynes' track record and the implications for maintain a 5 years supply are detailed in our statement on matter xxx. Furthermore, although the SA indicates that the site was sequential less preferred, there is no detail showing the order of preference of site.
- 1.14 The rejection of medium sites as allocations, especially given the concerns highlighted in the SA regarding delivery indicates that reasonable options have not been fully considered in the plan.
- 1.15 The authority must therefore demonstrate why reasonable alternatives assessed in the preparation of the Core Strategy have not been reconsidered for Plan:MK. This is especially important for medium sized sites such as Levante Gate given the clear recognition within the Sustainability Appraisal that that Council's approach in concentrating on a limited number of sites has impacted upon housing delivery resulting in the shortfall experience. It is only through re-considering alternatives previously assessed that the authority will be able to ensure delivery in both the short and longer term. The current strategy is not therefore considered justified, effective and positively prepared and national policy compliant.

Q1.10 Does the Policies Map illustrate the appropriate information? Are all relevant land-use designations shown on the Policies Map? (NPPF – para 157, 4th bullet point). Is there a schedule of modifications to the Policies Map?

- 1.16 The response to question 1.1 details our concerns regarding consistency of the Plan with the LDS. The Areas of Attractive Landscape example included in the response whilst listed in table 1 of the Map changes document, there is no map showing the removal of the designation. As explained in the response to question 1.1, this is concerning since the inclusion of a site within this designation is referred to within policy HN12.

Appendix 1 – Extract of Core Strategy Sustainability Appraisal Addendum (2) September 2011

Core Strategy Sustainability Appraisal Addendum (2)

Incorporating and updating the Sustainability Appraisal of
Reasonable Alternative Sites January 2011

September 2011



www.milton-keynes.gov.uk/core-strategy-submission

1. Introduction

- 1.1 In the 'Revised Pre-Submission Publication Core Strategy' (October 2010), the four Local Plan Strategic Reserve Areas (SRAs) to the south east of the city were allocated for up to 2,500 homes. A plan of the SRAs is shown at Annex A. Through the sustainability appraisal (SA) of MK2031 and previous stages of the Core Strategy, the area south east of the city was consistently identified as a direction for future growth in Milton Keynes Borough. The Pre-Submission Publication Core Strategy (February 2010) had previously allocated up to 7,300 homes to the south east of the city (4,800 to meet the South East Plan requirement and 2,500 in the Strategic Reserve Areas). The allocation of just the SRAs for 2,500 dwellings in the revised Core Strategy (October 2010) represented a scaling back of the SE SDA to sites previously identified through the Local Plan process. An appraisal of this approach was published in the Sustainability Appraisal Addendum (October 2010) alongside the Revised Pre-Submission Publication Core Strategy.
- 1.2 Since the publication of the Revised Proposed Submission Core Strategy and associated Sustainability Appraisal Addendum (October 2010), an assessment has been undertaken to consider what reasonable alternatives could also be considered to meet the allocation of 2,500 dwellings in the Core Strategy. This was published in January 2011 in the form of the 'Sustainability Appraisal of Reasonable Alternative Sites' and was published for consultation between the 15 June and the 27 July 2011
- 1.3 As a result of the consultation this 'Sustainability Appraisal Addendum (2)' report has been produced as a further addendum to the Sustainability Appraisal and incorporates and updates the Sustainability Appraisal of Reasonable Alternative Sites (January 2011).
- 1.4 This 'Sustainability Appraisal Addendum (2)' (September 2011) report should be read alongside the following SA documents:
- Core Strategy Sustainability Appraisal Report (February 2010)
 - Core Strategy Sustainability Appraisal Addendum (October 2010).

Meeting the Requirements of the SEA Directive

- 1.5 The above reports have been prepared in accordance with the government guidance on Sustainability Appraisal. They fulfil the requirements of the Planning and Compulsory Purchase Act 2004 for the production of the Core Strategy to be subject to SA. They also meet the requirements of the Strategic Environmental Assessment Directive (2001/42/EC). The way these reports meet the specific requirements of the SEA directive are signposted in the table below.

Meeting the SEA Directive Requirements	
Requirement of the SEA Directive	Where covered
a) an outline of the contents, main objectives of the plan or programme,	Sustainability Appraisal Report (February 2010):

and relationship with other relevant plans and programmes	<ul style="list-style-type: none"> • Task A1 Consideration of other plans, programmes and policies, • Task A3 Identifying key sustainability issues and trends, • Task D2 Appraising significant changes, • Appendices 2, 8, 15, 16 and 17
b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	<p>Sustainability Appraisal Report (February 2010):</p> <ul style="list-style-type: none"> • Task A2 Baseline Data, • Appendix 3
c) the environmental characteristics of areas likely to be significantly affected	<p>Sustainability Appraisal Report (February 2010):</p> <ul style="list-style-type: none"> • Task A2 Baseline Data, • Task A3 Identifying key sustainability issues and trends, • Appendix 3
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	<p>Sustainability Appraisal Report (February 2010):</p> <ul style="list-style-type: none"> • Task A2 Baseline Data, • Task A3 Identifying key sustainability issues and trends, • Appendix 3
e) the environmental protection objectives, established at international, community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation	<p>Sustainability Appraisal Report (February 2010):</p> <ul style="list-style-type: none"> • Task A1 Consideration of other plans, programmes and policies, • Task A4 Developing the SA Framework, • Task D2 Appraising significant changes, • Appendices 2, 4, 5 and 15
f) the likely significant effects on the environment, including 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 interrelationship between the above factors	<p>Sustainability Appraisal Report (February 2010):</p> <ul style="list-style-type: none"> • Task B2 Developing the Core Strategy options, • Tasks B3 & B4 Predicting and evaluating the effects of the Core Strategy, • Task B5 Mitigating adverse/maximising beneficial effects - Preferred Options assessment, • Task D2 Appraising significant changes, • Appendices 6, 10, 12 and 17-26 <p>Sustainability Appraisal Addendum (October 2010)</p> <p>Sustainability Appraisal Addendum (2) (incorporating the Sustainability Appraisal of Reasonable Alternative Sites) (September 2011)</p>
g) the measures envisaged to	Sustainability Appraisal Report (February 2010)

prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme	<p>2010):</p> <ul style="list-style-type: none"> • Task B5 Mitigating adverse/maximising beneficial effects - Preferred Options assessment, • Task D2 Appraising significant changes, • Appendix 12 <p>Sustainability Appraisal Addendum (October 2010)</p>
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>Sustainability Appraisal Report (February 2010):</p> <ul style="list-style-type: none"> • Task B2 Developing the Core Strategy options, • Tasks B3 & B4 Predicting and evaluating the effects of the Core Strategy, • Task D2 Appraising significant changes, • Appendices 9, 10, 18 and 19 <p>Sustainability Appraisal Addendum (2) (incorporating the sustainability appraisal of reasonable alternative sites) (September 2011)</p>
i) a description of the measures envisaged concerning monitoring in accordance with Art 10	<p>Sustainability Appraisal Report (February 2010):</p> <p>Task B6 Proposals for monitoring the significant effects of implementing the Core Strategy</p>
j) a non-technical summary of the information provided under the above headings	<p>Non Technical Summary within the Sustainability Appraisal Report (February 2010)</p>

2. Purpose of Report

- 2.1 This report focuses on the identification and assessment a range of reasonable alternatives for the strategic allocation of 2,500 dwellings within Milton Keynes as part of the Core Strategy.

3. Identification of alternative sites

- 3.1 Previous Sustainability Appraisal work through MK2031 and the Core Strategy has considered alternative locations for growth. However, these were based on broad areas of growth and larger scale sites accommodating more than 2,500 dwellings. Given the reduction in the numbers, it is considered reasonable to re-consider previously considered sites in order to assess them on an equal basis.

- 3.2 Given this, a list of basic criteria for identifying sites was drawn up. The following criteria have been used:

1. Must be within the Milton Keynes Borough boundary
2. Sites need to be adjacent to existing or planned urban area
3. Must have capacity for approximately 2,500 dwellings

- 3.3 The MK Strategic Housing Land Availability Assessment and representations made through the Core Strategy have been used as the basis for identifying possible sites to meet the above criteria. As a result of this search the following sites were identified in addition to the Strategic Reserve Areas (see Annex A for location plans):

REF	DESCRIPTION	AREA (ha)	ASSUMED CAPACITY
MKSA1	WEA Expansion	137.48	2,405
MKSA2	East of M1 'north'	300.15	5,252
MKSA3	East of M1 'south'	177.56	3,107
MKSA4	Land following the A421 to the south, with a small part north of the A421, adjoining the Eastern Expansion Area.	158.74	2,777
MKSA5	South of the A421, extending from site closest to the existing city at Wavendon Gate to the Easterly boundary of Wavendon Golf course. It extends south to the junction of the A5130 with Cross End Road.	163.67	2,864
MKSA6	Abutting the existing city	136.00	2,380
MKSA7	Abutting the existing city and extending south, crossing the railway line	165.93	2,903
MKSA8	Land south of the Marston Vale Line and north of the Woburn Sands Road	145.94	2,553
MKSA9	Land at Eaton Leys, Levante Gate and land south of Caldecotte/east of the A5.	139.64	2,443

As a result of the consultation on the January 2011 Sustainability Appraisal of Reasonable Alternative Sites, the following new sites were identified and five sites were promoted but considered unsuitable and therefore ruled out:

REF	DESCRIPTION	AREA (ha)	ASSUMED CAPACITY
MKSA 10	Land South of the A421 including the golf course (David Lock)	147	2,572
MKSA 11	Enlarged SR4 and removal of SR3	158	2,765

- 3.4 The “assumed capacity” is based on the SHLAA assumptions of 50% of a site being developed for housing at a density of 35dph. This makes an allowance for the provision of key infrastructure such as major distributor roads; schools; open spaces, strategic green buffers, employment, facilities serving a wider part of the community (e.g. for leisure or shopping) and other non residential uses, which will generally be required on larger sites. This is only an indicative figure and could be higher or lower in actual delivery.
- 3.5 Sites MKSA2 and MKSA3 have an assumed capacity that is over 500 dwellings more than the 2,500 threshold. The appraisal has been undertaken on the assumption of only 2,500 dwellings being delivered, but it is acknowledged that these sites could be re-assessed as part of a future review to deliver further housing growth.
- 3.6 In some cases, land between two sites has not been promoted through the SHLAA or Core Strategy, but it was considered that, in order to provide a

comprehensive development and to meet the minimum 2,500 dwelling capacity, this land should be included in the appraisal.

- 3.7 Where smaller sites could come forward on their own, not part of a strategic allocation, they can be assessed on their own merits as part of a Site Allocations DPD if necessary.
- 3.8 Alternative sites MKSA4, MKSA5, MKSA6, MKSA7, MKSA10 and MKSA11 all include land that consist of parts of the SRAs. The relationship between the identified alternative sites and the SRAs is shown on the accompanying maps in Annex A.

Sites ruled out

- 3.9 Five sites were promoted through the consultation and not included in the appraisal process at:
- land north east of Woburn sands,
 - a smaller version of MKSA4,
 - land at Tickford Fields Farm,
 - land south West of the Milton Keynes ('Salden Chase')
 - 'Shenley Dens' (a smaller version of MKSA1),
- 3.10 Location maps are shown at Annex A. These sites were not considered to be reasonable alternatives for the following reasons:
- Land north east of Woburn Sands would have an approximate capacity of 717 dwellings, a long way short of the 2,500 requirement. It would also form an extension to Woburn Sands, rather than an extension to the city. It is more appropriate to consider the site through a Site Allocations DPD.
 - The smaller version of MKSA4 would have a capacity of just 1,855 homes, again, significantly below the 2,500 requirement. This, combined with the fact that the proposal forms part of an already appraised MKSA4, is considered sufficient to discount the site as a reasonable alternative.
 - Tickford Fields Farm is also considered unsuitable as a reasonable alternative as it adjoins the rural settlement of Newport Pagnell and is not large enough (with an assumed capacity of approximately 454 dwellings) to accommodate the required 2,500 dwellings.
 - The 'Salden Chase' site (formerly the South west Strategic Development Area) has also been ruled out. Growth in adjoining authority areas has been considered previously in MK2031 and at earlier stages of the Core Strategy sustainability appraisal. At that time, there was a realistic prospect of sites being delivered and so they formed 'reasonable alternatives'. Since the proposed revocation of Regional Strategies, Aylesbury Vale District Council has withdrawn its Core Strategy that had included a site to the south west of Milton

Keynes. Given that Milton Keynes Council has no planning powers outside its own boundary, it is considered that looking for options outside MK borough would not form a reasonable alternative, as there is no realistic prospect of delivery within the plan period.

- ‘Shenley Dens’ would be incapable of accommodating 2,500 dwellings for allocation in the Core Strategy (with an assumed capacity of approximately 383 dwellings (promoter of site proposes capacity of 550 dwellings) and should be considered through the site allocations DPD.

4. Appraisal of sites

4.1 All of the reasonable alternatives have been assessed against the MK2031 Sustainability Appraisal objectives using the same assumptions, to provide consistency with previous sustainability appraisal work on future areas of growth. It should be noted that a direct comparison with earlier appraisals, other than the work undertaken for the SRAs, cannot be made due to the differing site boundaries and the reduction in the level of development proposed.

4.2 The full appraisal tables are shown at Annex B, a summary conclusion for each alternative site is shown below:

MKSA1
Conclusion
There are negative implications in terms of rural landscape and the impact of development on the Shenley ridge and the countryside beyond. Development could also impact on the villages of Calverton, Upper Weald and Lower Weald and there is a risk of increased congestion including in surrounding villages. Links to the WEA will be crucial to avoid development being brought forward in a disjointed manner due to the dispersed nature of the sites and to support the sustainability objectives, without these links the sustainability of the option would be compromised.

MKSA2
Conclusion
The site is heavily constrained through the location of large areas of flood zone 2 and 3. Aside from flooding issues, there are few other environmental constraints on the site. A positive point is that The site is also potentially large enough to potentially meet future demand beyond 2026. There are possible issues associated with the close proximity to the motorway such as increasing congestion. The motorway could also act as a barrier to the existing city. Junction 14 is accessible and could lead to increased commuting outside the Borough.

MKSA3
Conclusion
The site is relatively unconstrained in environmental terms. A small part is within flood zones 2 and 3 but this is not significant in relation to the size of the site. The main access, without significant investment in new roads east of the M1 outside the site boundary, would be through the Eastern Expansion Area although this may require some re-planning of the EEA which currently benefits from outline planning permission. This could provide opportunities to extend the EEA public

transport route, but equally could lead to greater congestion within the EEA. Junction 14 of the M1 is potentially accessible through the EEA and could lead to increased commuting outside the Borough.

MKSA4

Conclusion

The site generally performs well in social terms although the A421, which separates the site from the Eastern Expansion Area, may act as a barrier to access. The site's location is likely to increase congestion generally but also on and around routes to the M1 in particular. In terms of environmental constraints, this site has very few. Development in this location will, however, inevitably have an impact on the landscape setting of Wavendon and poses a risk of coalescence if an adequate landscape/open space buffer is not provided.

MKSA5

Conclusion

The site generally performs well in social terms although the A421, which separates the site from the Eastern Expansion Area, may act as a barrier to access. The site's location is likely to increase congestion generally but also on and around routes to the M1 in particular. In terms of environmental constraints, this site has very few. Development in this location will, however, inevitably have an impact on the landscape setting of Wavendon and Woburn Sands and poses a risk of coalescence if an adequate landscape/open space buffer is not provided.

MKSA6

Conclusion

In relation to social indicators, the development of 2,500 dwellings in this location scores well because of its location abutting the existing city which will ensure good access to facilities and services. The site's location is likely to increase congestion generally but also on and around routes to the M1 in particular. Part of the site is in close proximity to the railway line and Woburn Sands station which could support the proposed East West Rail and provide access to the stations to encourage some transport choice. Development in this location will have an impact on the landscape setting of Wavendon and Woburn Sands and poses a risk of coalescence if an adequate landscape/open space buffer is not provided particularly in relation to Wavendon due to the way the site wraps around the edge of the village.

MKSA7

Conclusion

There are specific environmental issues on this site, including the existence of a Wildlife Corridor and the site's location adjacent to the Brickhills Area of Attractive Landscape which is of high landscape quality. In relation to social and economic indicators, the development of 2,500 dwellings in this location does score positively; it will support the east-west rail development, for example. However, the sustainability of this site is compromised by the separation of the site by the railway line. There is also a risk of landscape impacts on, and coalescence with, Wavendon and Woburn Sands if an adequate landscape/open space buffer is not provided and of increased congestion. Part of the site is in close proximity to the railway line and Woburn Sands station which could support the proposed East West Rail and provide access to the stations to encourage some transport choice.

MKSA8
Conclusion
<p>This site generally performs well against social objectives, although the location of the railway could act as a possible barrier to the rest of the city. Although the site rates poorly in environmental terms, it does have some potential positives in supporting East West Rail proposals. There are, however, negative impacts on the Brickhills Area of Attractive Landscape (identified as being of high quality in the Landscape Character Assessment) and a risk of impacting on and coalescence with Bow Brickhill and Woburn Sands if an adequate landscape/open space buffer is not provided. Development could also negatively impact upon the wildlife corridor adjacent to the site and, additionally, it is likely to lead to an increase in congestion on surrounding roads and at points crossing the railway line without improved access. Part of the site is in close proximity to the railway line and Woburn Sands and Bow Brickhill stations which could support the proposed East West Rail and provide access to stations to encourage some transport choice.</p>

MKSA9
Conclusion
<p>The site offers opportunities to enhance nearby areas of Bletchley and the Lakes Estate in terms of social sustainability objectives. The development is likely to lead to an increase in congestion, but is in close proximity to the East West Rail line, offering opportunities to encourage some transport choice. The location of a Scheduled Ancient Monument and large areas of flood risk have serious negative environmental impacts that would require mitigation. The site would also have a negative impact on the Brickhills Area of Attractive landscape.</p>

MKSA 10
Conclusion
<p>The site generally performs well in social terms although the A421, which separates the site from the Eastern Expansion Area, may act as a barrier to access. The land located to the south of Lower End Road (the 18 hole Wavendon Parkland Golf Course) is mostly disconnected from the main site and surrounded by some historically sensitive small rural holdings which may lead to coalescence issues. The site's location close to the M1 may lead to an increase in congestion. In terms of environmental constraints, this site has very few. There is, however, a Scheduled Ancient Monument that development would need to take account of. Overall, the site performs reasonably well in sustainability terms, however, the shape of the site may impact on its overall sustainability, particularly in terms of the efficient use of land and the protection of open countryside.</p>

MKSA 11
Conclusion
<p>In relation to social indicators, the development of 2,500 dwellings in this location is particularly positive because of its location abutting the existing city which will ensure good access to facilities and services. The site may contribute to congestion, but this could be reduced by the proximity of part of the site to the proposed east west rail line. There is a risk of coalescence with Wavendon and Woburn Sands and the split nature of the site could make creating strategic landscape buffers around these settlements and Wavendon in particular, harder to achieve. The two separate sites could also make creating walkable neighbourhoods and the provision of services more difficult.</p>

Strategic Reserve Areas
Conclusion
The site has no significant environmental constraints. In relation to social and economic indicators, the development of 2,500 dwellings in the SRAs does score positively, such as improving housing affordability and reducing crime and the fear of crime. However, the dispersed nature of the SRAs significantly restricts the benefits and overall, the sustainability of the SRAs is reduced by their separate nature. The lack of connection between the sites has particular implications in terms of: achieving a modal shift in transport; the provision of services and facilities; and the efficient use of land, particularly looking at possible future growth (post 2026).

5. Conclusion

- 5.1 Overall, the sustainability work has shown that development to the south east of the city performs better than other options, albeit marginally in some cases. This is primarily due to the relatively low environmental impact (even with some of this being offset by the location in close proximity to the M1). It should be noted that developing on greenfield land means that overall, none of the assessed sites score favourably in relation to the environmental indicators, but some have particular constraints such as flood risk, coalescence or impacts on designated landscapes. Option MKSA1 rates slightly worse than other options, partly, but not exclusively, because it is comprised of two sites and is therefore dependent on links to the Western Expansion Area to achieve some of the sustainability objectives.
- 5.2 The appraisal shows that joining sites to form a single development site would have potential benefits, particularly socially and environmentally. The benefits of making a strategic allocation as a single site rather than separate sites were highlighted with the appraisal of the Strategic Reserve Areas in the Sustainability Appraisal Addendum (October 2010). The full appraisal table is shown in Annex B (page 35). MKSA11 also consists of two separate sites which may have implications for the overall sustainability of the option, particularly in terms of land use and service delivery, although the impacts are likely to be less pronounced than with the SRAs.
- 5.3 The Strategic Reserve Areas do score positively for their social and economic impacts and, although development is on greenfield land, the sites are relatively unconstrained and do not have issues around possible coalescence associated with other alternative options. The SRAs are all adjacent to the existing city boundary and provide opportunities to link to either existing grid squares or the Eastern Expansion Area (SR4 to Wavendon Gate/Old Park Farm and SR1, SR2 and SR3 to the Eastern Expansion Area albeit crossing the A421). As individual sites, they are generally sustainable locations for development and would have a number of positive points. However, as a single strategic allocation (the basis on which they have been assessed), the sustainability of the SRAs is reduced by the separate nature of the sites.
- 5.4 All the other options (with the exception of MKSA1 where the site is split into two parts and relies on the WEA to form a single development and MKSA11 which is also two separate sites) have been considered as a single site which

has potentially resulted in them performing better against the sustainability objectives.

- 5.5 In the case of MKSA1, MKSA11 and the SRAs, it may be possible to mitigate some of the issues and areas of uncertainty raised by their dispersed nature through careful master planning. However, not all of the impacts can be mitigated and this should not be relied upon to improve the sustainability of the options.

Choosing a preferred option

- 5.6 Having considered the findings of the Sustainability Appraisal process and responses to the consultation, further consideration of sites was given in the 'Core Strategy Strategic Site Selection' paper (September 2011). This paper considered the findings of the SA process, alongside other planning considerations, to identify a site for allocation and provide reasons for not selecting the other options.
- 5.7 It was concluded that the allocation shown in Annex A (page 34) as 'Strategic Allocation' would be the most appropriate allocation when considered against the reasonable alternatives.
- 5.8 This preferred site is a combination of most of MKSA4 (although the western section beyond the Strategic Reserve Site SR2 is excluded) and the SRAs. The reasons for allocating the site were:
- The site lies in the area consistently identified as the most sustainable direction of growth in past studies.
 - Lower landscape value of the site and the surrounding area compared to alternatives.
 - The impact on views and landscape setting is likely to be far smaller than for some of the alternative sites.
 - Good integration with the existing city, including connection to the main public transport routes.
 - In an area of recent infrastructure investment.
 - Relatively low development costs compared to alternatives, due to lack of constraints.
 - Not in an area of flood risk (except for a very tiny part in the northern part of the site).
 - Established planning history and public acceptance of development in this area.
 - Nature of site enables an element of flexibility and choice.
 - Could support an element of employment use due to good transport links.
 - Minimal impact on the nearby rural settlements of Wavendon, Woburn Sands and Aspley Guise.

5.9 The main reasons for ruling out the alternatives have been identified as:

MKSA1:

- Significant impact on landscape character through development over Shenley Ridge
- Uncertain deliverability during the plan period due to relationship with the existing WEA allocation.
- Large supply of existing housing allocations/permissions in the vicinity.
- Relatively poor integration with the principle road network
- Lack of connections to existing linear park (although links to WEA open space)

MKSA2:

- Additional costs and feasibility of crossing the M1
- Uncertain impact on capacity of junction 14
- Relatively poor integration with the existing city
- Lack of logical defensible boundaries
- Contains a significant area of flood risk
- Potential sterilisation of minerals reserve/delay to the delivery of the site.

MKSA3:

- Very poor integration with the city
- Additional costs/feasibility of crossing the M1
- Lack of existing transport infrastructure
- Lack of logical defensible boundaries

MKSA4

- The eastern majority of this site forms part of the chosen option

MKSA5:

- Impact on 18 hole golf course
- Greater level of coalescence
- Lack of connections to existing linear park or open space

MKSA6:

Entire site although the SR4 is covered in SRA sites below

- Greater level of coalescence
- Less overall integration with the urban area
- Poorer links with key public transport routes

MKSA7:

Entire site although the SR4 is covered in SRA sites below

- Additional costs of crossing the railway line
- Poorer integration and connectivity with the city
- Potential impact on Brickhills AAL

MKSA8:

- Additional costs of crossing the railway line
- Poorer integration and connectivity with the city
- Potential impact on Brickhills AAL
- Greater level of coalescence.

MKSA9:

- Significant flood risk
- Impact on archaeology
- Potential impact on Brickhills AAL
- Relatively poor connection with the city.
- Site divided by the A5

MKSA10:

- Lack of connections to existing linear park or open space
- Impact on the Wavendon settled ridge
- The south eastern part of the 18 hole golf course is isolated from the existing city and could undermine the ability to create a comprehensive development
- Loss of the 18 hole golf course

MKSA11

- Greater level of coalescence

SRAs

- The SRAs form part of the chosen option. They were not considered the most appropriate allocation on their own, given their dispersed nature.

5.10 As the chosen site is an amalgamation of the SRAs and MKSA4, the land has already been subject to appraisal. MKSA4 had performed well against the sustainability objectives and the SRAs were considered to be suitable locations, albeit undermined by being separate sites. Linking SR2 and SR3 should improve the sustainability of the option.

5.11 To ensure all sustainability implications have been assessed, an updated appraisal has been produced to assess the chosen option against the sustainability appraisal objectives. The full assessment is shown in Annex B (page 87) and a summary is shown below.

Strategic Allocation
Conclusion
The site generally performs well in social and economic terms, although the A421, which separates the site from the Eastern Expansion Area, may act as a barrier to access. The site's location close to the M1 may lead to an increase in congestion. In terms of environmental constraints, this site has very few. SR4 is separate from the main part of the site and this will need to be carefully integrated with Old Farm Park to avoid the development becoming isolated.

- 5.12 The site performs well against the alternatives and is similar to MKSA4, with the added benefit of a reduced risk of coalescence with Wavendon. SR4 is separated from the rest of the site, but there are opportunities to link to the existing city, the execution of which should be ensured through the development of a suitable master plan for the chosen option. A master plan should also seek to mitigate the issues identified through the appraisal process, such as congestion and accessibility, guided by the Core Strategy policies and Policy CS5 in particular.

