



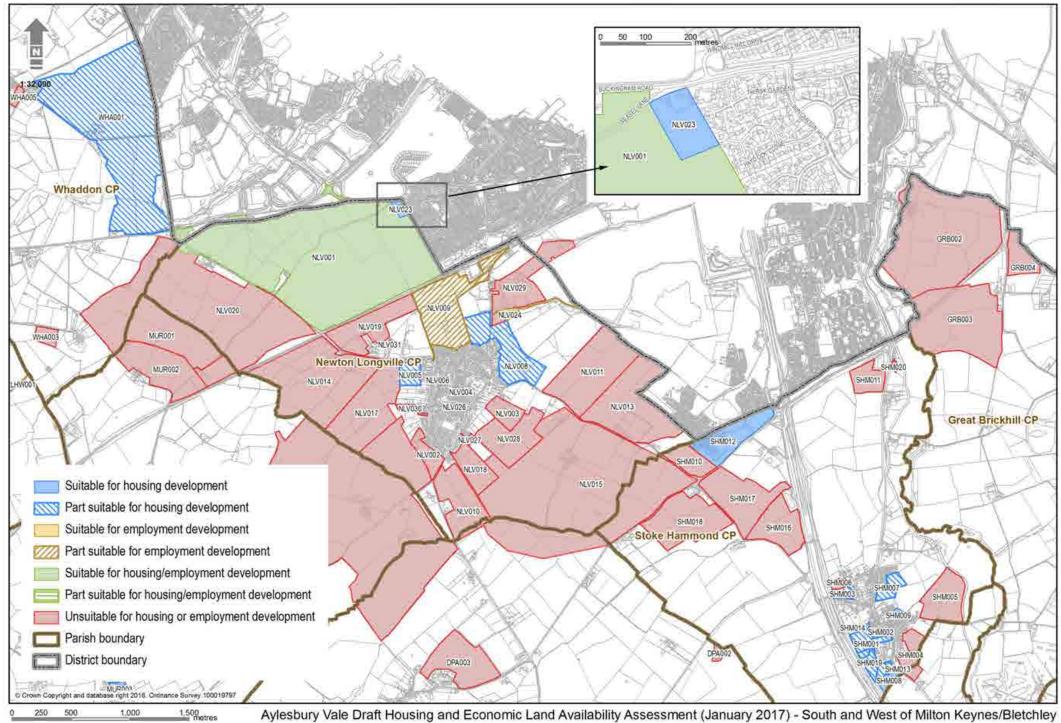
South West Milton Keynes

Updated Environmental Statement Volume 2 - Appendices

Carter Jonas LLP

APPENDIX 3.1:

SOUTH AND WEST OF MILTON KEYNES/BLETCHLEY MAP FROM
HOUSING ECONOMIC LAND AVAILABILITY ASSESSMENT
(JANUARY 2017)



APPENDIX 3.2:

MILTON KEYNES EDGE ASSESSMENT FROM SUSTAINABILITY APPRAISAL TECHNICAL ANNEX



MILTON KEYNES EDGE

Introduction

This proforma aims to present information on alternative approaches that might be taken to the allocation of land for housing at the Milton Keynes edge, through the Vale of Aylesbury Local Plan (VALP). Systematic and timely consideration of alternatives of alternatives is necessary for soundness¹⁰ and also a requirement of the Sustainability Appraisal (SA) process.¹¹

Specifically, this proforma -

- 1) Introduces the opportunities and constraints to growth at Milton Keynes edge
- 2) Lists the sites that are available to deliver growth, i.e. the options 'in the running' for allocation
- 3) Discusses potential alternative approaches to site allocation at Milton Keynes edge
- 4) Considers 'reasonable alternatives' necessitating formal appraisal
- 5) Draws conclusions.

Opportunities and constraints

The northern part of Aylesbury Vale District directly adjoins Milton Keynes (MK), a former new town and growing regional centre. As such, there is a need to consider the potential for the allocation of land for housing and/or employment, to contribute to both Aylesbury Vale and MK specific objectives. Evidence is available to show the strong linkages between the District and MK, with the MK functional Housing Market Area (HMA) stretching across the north of the District, and many residents within the District commuting into MK for work and travelling in to access retail and other facilities, principally via the A421.

Rail links between the District and MK are poor, with only Cheddington on the eastern edge of the District on the MK (to Euston) train line; however, rail links will improve as a result of East West Rail, which will involve the creation of a spur between MK and Aylesbury (via Aylesbury Vale Parkway and a new station at Winslow) early in the plan period. There is already an Aylesbury to MK express bus service.

There is also a need to recognise the longer term opportunity associated with the proposed Oxford to Cambridge Expressway. Two of the three high level route options currently being explored would involve a route west from Junction 13 of the M1 across south Milton Keynes, or along the southern edge of Milton Keynes (with the third route option being a southern route from J13, via Leighton Buzzard and then Aylesbury). The selection of one of the two northern route options, and the selection of the precise route through/along southern MK, could have considerable spatial strategy implications, in respect of housing and employment growth. However, selection of a preferred route is not anticipated for some time.

There is already some cross-boundary development occurring, and more planned. Specifically, one large site is under construction (SHM012, 350 homes at MK's southern tip) and a significantly larger site recently gained a 'resolution to permit subject to Section 106 agreements' (NLV001, 1,855 homes at Salden Chase). The Salden Chase scheme will include a secondary school and a small employment area.

With regards to constraints, there is a particular need to consider -

- sensitivities associated with Newton Longville (a Medium Village) and Whaddon (a Smaller Village, with a designated conservation area);
- potential traffic impacts in the strategic A421 transport corridor, on Milton Keynes itself and on villages near to potential development sites;
- landscape sensitives associated with proposed locally designated landscapes (Areas of Attractive Landscape, AALs) to the west (including Whaddon) and east (north of Stoke Hammond and Great Brickhill); and
- biodiversity sensitivities recognising that 'Whaddon Chase' (to the west) and the River Ouzel valley (to the east) are County-level Biodiversity Opportunity Areas (BOAs).

Figure A depicts a range of readily map-able constraints.



Site options

The HELAA Report (January 2017) reports the outcome of the HELAA process. For each of the 17 HELAA sites on the MK edge, it concludes on -

- Suitability for housing 4 sites are found to be suitable, or part suitable
- Suitability for employment 1 sites are found to be suitable, or part suitable.

In terms of identifying sites that should feature within (i.e. 'form the building blocks for') spatial strategy alternatives, there is a clear need to focus primarily on sites deemed 'suitable' or 'part suitable' through the HELAA. However, 'unsuitable' HELAA sites should not necessarily be ruled-out entirely. This is on the basis that the HELAA is by its nature not the last-word in plan-making. The HELAA involves looking at sites in isolation (i.e. one by one), with no consideration given to the strategic context, e.g. in combination effects of developing more than one, or numerous sites. There is the potential for strategic factors to result in an 'unsuitable' HELAA site ultimately being deemed suitable for allocation.

Figure B shows: A) Commitments; B) Sites deemed 'suitable' or 'part suitable' for housing through the HELAA; and C) Sites deemed 'unsuitable' for housing through the HELAA. In addition, Figure B builds-upon the HELAA by in respect of 'part suitable', where possible. See further explanation, below.

Potential alternatives

Recognising the recent 'resolution to grant planning permission' at Salden Chase on the southern edge of MK (NLV001, 1,855 homes), a reasonable 'do minimum' approach to allocations at the MK edge would involve nil allocations (over-and-above NLV001, which must be allocated, as the 'resolution to grant' was subsequent to the Local Plan cut-off date of 31st March 2017), despite the fact that this approach would serve to increase pressure for development at other settlements, including smaller settlements.

There is also a need to consider **higher growth** options, which would involve additional allocation of -

- A. GRB002 (1,200 homes) HELAA *unsuitable*, but would involve completing the 1,800 home 'Land at Eaton Leys' cross-boundary site, i.e. the 1,200 homes would be in addition to the 600 homes already permitted on land directly to the north, within MK borough.
- B. WHA001 (up to 2,000 homes) to the west HELAA *suitable*; however, sensitive from a heritage/landscape perspective, including as it forms a landscape gap between MK and Whaddon; and/or
- C. MUR001, MUR002 and NLV020 (up to 3,000 homes) HELAA *unsuitable*, but together would extend the recently permitted 1,855 home 'Salden Chase' scheme. All of these sites were supported within the South East Plan (now revoked) as the North East Aylesbury Vale Strategic Development Area.

There are also a number of other HELAA unsuitable sites in the vicinity of Newton Longville; however, opportunities for strategic scale expansion are less apparent here, and all of the sites are notably constrained, with a key issue being the need to maintain a landscape gap between Newton Longville and the MK edge. These sites are sequentially less preferable to the sites discussed above.

Focusing on (A), (B) and (C), in addition to the possibility of allocating one of these sites, there is also the question of whether more than one site could be allocated. On balance, it is suggested that the only feasible 'combination' higher growth option would involve the two smaller sites - (A) and (B) - as any other combination would result in over-development, with likely negative sustainability implications and also deliverability risks.



Reasonable alternatives

On the basis of the above discussion, it is possible to establish five reasonable alternatives -

- 1) Do minimum = allocations for 1,855 homes
- 2) Additional allocation of GRB002 for 1,200 homes = 2,055 homes
- 3) Additional allocation of WHA001 for 2,000 homes = 3,855 homes
- 4) Additional allocation of MUR001, MUR002 and NLV020 for 3,000 homes = 4,855 homes
- 5) Additional allocation of GRB002 and WHA001 for 3,200 homes = **5,055 homes**

The table below presents a discussion of the relative performance of the alternatives in respect of the 12 sustainability topics that comprise the established 'SA framework'. The alternatives are placed in order of preference, or '=' is used to indicate that the alternatives perform broadly on a par.

Topic	Opt 1	Opt 2	Opt 3	Opt 4	Opt 5	Discussion
Biodiversity			2	2	2	The Whaddon and Salden Chase sites to the southwest and south are notably sensitive, given that they sit within a Biodiversity Opportunity Area (BOA), with Thrift Wood Local Wildlife Site (LWS) adjacent and other woodland LWSs nearby. The Bucks Green Infrastructure Strategy (2013) identifies the potential benefits that might arise from quite extensive woodland creation within this area, which it refers to as Whaddon Chase. In particular, the potential for a large area of habitat creation within the Whaddon site (Options 3 and 5) is identified. Development could potentially facilitate targeted habitat creation, such that there is landscape-scale 'biodiversity gain'; however, this is uncertain. Perhaps more likely is that significant development would be contrary to BOA / Bucks GI Strategy objectives. The final site at Eaton Leys to the east is perhaps less sensitive, although the boundary of the site is defined by the Grand Union Canal / River Ouzel floodplain, which is a BOA, and Waterhall Park LWS is adjacent. More generally, the site is within the Brickhills Area of Attractive Landscape (AAL), which is associated with: "Rich natural character influenced by the large number of linked features including heathland, woodland, grassland and wetland." \[^{16}\] As discussed, land adjacent to the north within MK (which similarly borders the canal) recently gained planning permission, with policy for the site published within Draft Plan MK (March 2017), to reflect the planning permission. The Draft Plan MK policy does not reference the need to account for any particular biodiversity issues/opportunities.
Climate change adaptation	=	Ξ	=	Ξ	=	Flood risk is not a major constraint to development at the MK edge. The Salden Chase and Eaton Leys sites intersect a flood risk zone; however, there would be good potential to leave land within the flood zone undeveloped, i.e. use this land for green infrastructure.

6

¹⁶ Defining the special qualities of local landscape designations in Aylesbury Vale District. LUC, March 2016. See https://www.aylesburyvaledc.gov.uk/sites/default/files/page_downloads/Aylesbury%20Vale%20Local%20Landscape%20Designations%20FINAL%20REPORT%2027%2004%2016.pdf

Climate change mitigation	2	2	2	2	Applying broad rules of thumb, the scale of all sites indicates that there could be potential to achieve the economies of scale necessary to deliver low carbon infrastructure, e.g. a combined heat and power station, associated with a district heating network. However, in practice there may be limited opportunity. Neither of the recent major planning permissions granted at the MK edge require low carbon infrastructure, reflecting viability considerations, i.e. the need to divert funds to other infrastructure, high quality design and affordable housing. A Salden Chase scheme (Option 4) would be notably larger, and hence there may be good potential at this site. It might also feasibly be masterplanned in coordination with the adjacent 1,855 home scheme that recently gained a 'resolution to grant planning permission'; however, in practice this may be unlikely.
Community	=	=	=	=	All sites would likely deliver a range of community infrastructure; and have reasonable ease of access to higher order facilities. All sites are a long distance from Central Milton Keynes (6km+), but the Whaddon and Eaton Leys sites are both close to a district centre (Westcroft and Bletchley, respectively). All sites would have good access to high quality countryside, in the form of Whaddon Chase or the Grand Union Canal / River Ouzel. Focusing on the large Salden Chase scheme (Option 4), the site would be somewhat isolated; however, given the scale of this scheme, there would undoubtedly be the potential to deliver a new local centre, and targeted community facilities in coordination with the adjacent 'resolution to grant' Salden Chase scheme (e.g. a large scheme proposed in past included land for a Park and Ride). However, on the other hand, it is noted that the possibility of a large scheme at Salden Chase has been considered in the past, over many years, and been found to have drawbacks, hence the recent focus on a more modest (1,855 home) scheme. In general, it is not clear that there are any particular community infrastructure opportunities to be realised through development at any of these sites, or development of sites in combination. Finally, with regards to negative implications for existing local residents, potentially the greatest concern relates to impacts to residents at Whaddon and Newton Longville. Traffic is often a concern to existing residents; however, this tends to be less so the case in Milton Keynes than elsewhere, recognising that there tends to be relatively good capacity on road infrastructure. All sites would have good access to a major road (either the A421 or A5); however, rat-running through villages could still be a concern, notably through Whaddon and Newton Longville.

Economy	=	=		=	Need/demand for employment land in Aylesbury Vale, as established through the Housing and Economic Development Needs Assessment (HEDNA), is broadly in balance with existing supply, which indicates little need to allocate new land for employment. However, it is worthwhile giving consideration to the potential to deliver new employment land nonetheless, recognising that employment growth forecasts are inherently uncertain. There is also a need to bear in mind that Aylesbury Vale HEDNA conclusions apply less to sites on the MK edge; however, a recent (June 2017) MK Economic Growth and Employment Land Study Partial Update concluded that: "In quantitative terms, there is sufficient supply in Milton Keynes to meet forecasted demand." N.B. in qualitative terms the study recorded uncertainty. All sites could feasibly deliver employment land, recognising that they abut a main road (with the potential for major upgrades at part of the Oxford to Cambridge Expressway); however, there is no certainty in this respect. The recently permitted Salden Chase scheme will deliver only a small employment area (precise size yet to be determined), whilst the recently permitted Eaton Leys scheme, within MK Borough, will not deliver any employment land. At Salden Chase (Option 4) the size of the site might suggest good potential to deliver employment land; however, the presence of a woodland would likely prevent employment land from being located adjacent to the main road (A421).
Heritage	2	3	2	4	The Whaddon site (Options 3 and 5) performs poorly on the basis that it would reduce the landscape gap between the edge of MK and the Whaddon Conservation Area (CA), and indeed abut the CA. It also falls within the Whaddon Chase landscape area, as defined by the Aylesbury Vale Green Infrastructure Strategy, and described as: "A very ancient relict landscape with a special local character due to the preservation of the former hunting chase landscape." However, it is noted that the site falls outside of the Whaddon Nash Valley Area of Attractive Landscape (AAL). The Salden Chase site is unconstrained by designated features; however, as per the Whaddon site discussed above, it falls within the Whaddon Chase landscape area (but outside of the Whaddon Nash Valley AAL) The Eaton Leys site is in close proximity to a cluster of listed buildings associated with Water Eaton, including Mill Farm, which is almost adjacent, and a listed canal bridge. The site falls within the Brickhills AAL, the heritage value of which was confirmed by a recent study, which references: "Historic landscape character of the canal and river corridor including historic flood meadows, bridges and locks, and the sense of enclosure and intimacy created by lush vegetation." It is fair to conclude that, from a heritage perspective, there is merit in leaving sites undeveloped. It is also fair to conclude that the Whaddon site is the most constrained.

¹⁷ See https://www.milton-keynes.gov.uk/planning-and-building/planning-policy/employment-evidence-base?chapter=2.
18 See https://www.aylesburyvaledc.gov.uk/sites/default/files/page_downloads/Green-Infrastructure-Flagship-Projects.pdf

Housing	=	=	=	=	=	The MK edge falls within the Milton Keynes functional housing market area, across which there is confidence regarding the potential to accommodate objectively housing assessed need (OAHN). In comparison, the south of the District falls within the Buckinghamshire functional housing market area, where accommodating OAHN is a major challenge, i.e. there is a risk of unmet needs. As such, it is difficult to conclude that higher growth options are necessarily preferred, from a 'housing' perspective. It is also the case that deliverability could be called into question under Option 5, i.e. it might transpire that the Council sets itself a target / establishes a housing trajectory that it cannot achieve, potentially with implications for the Council's ability to maintain a rolling 'five year housing land supply'. Similarly, it could be the case that there are deliverability risks associated with a large scheme at Salden Chase, including on the basis of potentially having to be delivered after the adjacent permitted site (1,885 homes); however, this is uncertain.
Landscape		2	2	2	3	With regards to the Eaton Leys site, the Aylesbury Landscape Study (2017) concludes: "The sites elevated nature exposes it to views from elevated hills Two PROW's intersect the site with views across the open rural landscape. The site lies within an area of proposed Designated Local Landscape and is of high landscape quality and value with wide panoramic views of the wider rural countryside. The site has no elements that would contribute to an urban fringe character [However] 70% of the site developable due to the reduction in susceptibility that development to the north would have on the site." With regards to the Whaddon site, the Aylesbury Landscape Study (2017) concludes: "Potential to develop 35% of the site as residential development, to the north of Shenley Rd, east of Bottle House Farm and against the eastern edge of Milton Keynes. Existing blocks of woodland could be extended to enclose development Topography of remaining site exposes it to surrounding landscape making it less suitable to develop." With regards to the Salden Chase site, the Landscape Study (2017) concludes that the southern half of the site is unsuitable "due to extent of exposure and isolation from settlement, which would be difficult to mitigate." In conclusion, as per the discussion under 'heritage', given the extent of development proposed/planned in the MK environs, it is fair to conclude that from a landscape perspective there is merit in leaving these sites, in terms of their relative landscape sensitivity. The Eaton Lees site falls within the Brickhills Area of Attractive Landscape (AAL), and a recent study has served to confirm the value of this AAL, 16 but the sensitivity of the site will be reduced once adjacent land in MK is developed.

Natural resources	Δ	2	***	**	2	A key consideration here is the need to protect agricultural land, and in particular land that is grade 1, 2 or 3a, which is defined as 'best and most versatile' (BMV) by the NPPF. All three sites have mostly been surveyed, using the 'post 1988 criteria', with results showing the Eaton Leys site to be notably constrained, comprising mostly grade 3a land (along with some grade 3b). In comparison, the other two sites comprise mostly grade 3b land. N.B. the permitted site adjacent to Eaton Leys (600 homes) comprises mostly grade 2 agricultural land, which serves to highlight that loss of BMV agricultural land is not necessarily a barrier to development.
Pollution	=	=	=	=	=	There are no Air Quality Management Areas (AQMAs) designated in Milton Keynes, and hence air quality is not thought likely to be an issue, when differentiating the alternatives. With regards to Wastewater Treatment Works (WwTW) capacity, the Aylesbury Vale Water Cycle Study (WCS, 2017) examines capacity at the Cotton Valley WwTW on the eastern edge of MK, which serves the majority of MK, as far west as Whaddon. The study does not highlight any concerns; however, it is noted that Anglian Water stated through the Draft VALP consultation (2017) that - "Anglian Water has made an assessment of the available capacity at Water Recycling Centres (formerly known as sewage treatment works) for each of the proposed housing allocation sites within our area of responsibility. It is important to note that this assessment does not take account of the cumulative impact of development on the identified Water Recycling Centres. This is particularly relevant to Buckingham Water Recycling Centre which serves a number of parishes within the district and Cotton Valley Water Recycling Centre which serves the Milton Keynes area." [emphasis added].
Travel / transport	2	\bigstar	3	3	3	Proximity to services/facilities has already been discussed above, under the 'Communities' heading. There is also a need to consider the matter of proximity to employment locations, and in this respect the Eaton Leys site potentially performs marginally best, as it is closer to the eastern side of Milton Keynes, where employment land is focused. The Eaton Leys site also benefits from being within walking distance of Bletchley Train station, which will be a stop on East West Rail. Furthermore, development here would potentially result in a lower proportion of trips along the A421 between MK and Buckingham, which is known to be a traffic congestion hotspot (albeit it may see upgrades as part of the Oxford to Cambridge Expressway). On balance, it is suggested that allocation of the Eaton Leys site is preferable to the 'do minimum', from a transport perspective; however, this conclusion is somewhat uncertain.
Waste	=	=	=	=	=	All alternatives could support sustainable waste management.



Conclusions

Option 1 ('do minimum', i.e. support only the 1,885 home Salden Chase scheme which has a resolution to grant planning permission) performs best in terms of the greatest number of objectives. There is a suggestion that is might result in something of an opportunity missed in respect of 'Climate change' and 'Transport' objectives; however, neither conclusion is reached with a high degree of certainty.

Another notable conclusion is that that Option 5 (highest growth) performs poorly, with concerns raised in respect of the majority of environmental objectives. Whilst it will not always be the case that a high growth option at a given settlement performs poorly from an environmental perspective, recognising that the effect may be to reduce pressure on more sensitive locations, at the MK edge there are some clear sensitivities, heightened by the scale of recent and planned growth.

Of the three strategic sites under consideration for allocation (in addition to the 1,885 home Salden Chase scheme), the appraisal potentially serves to suggest that it is the site at Whaddon (Options 3 and 5) that performs least well; however, this is not a clear cut conclusion. Another argument might be that the Eaton Leys site (Options 2 and 5) performs least well on the basis that it comprises mostly BMV agricultural land, or that the Salden Chase site (Option 4) performs least well on the basis of deliverability risks.

	Biodiversity	Climate change adaptation	Climate change mitigation	Community	Economy	Heritage	Housing	Landscape	Natural resources	Pollution	Travel / transport	Waste
Option 1	1	=	2	=	=	1	=	1	**	=	2	=
Option 2		=	2	=	=	2	=	2	2	=	**	=
Option 3	2	=	2	=	=	3	=	2		-	3	=
Option 4	2	=		=	=	2	=	2	**	=	3	=
Option 5	2	=	2	=	=	4	=	3	2	=	3	=

In response to the appraisal, the Council's view is that -

"Whilst the Council broadly agrees with SA findings, it places a higher degree of weight on the landscape constraint affecting the Eaton Leys site, recognising that the site falls within the Brickhills AAL, the value of which has been confirmed by a recent Study (Defining the special qualities of local landscape designations in Aylesbury Vale District, LUC 2016) and recognising that the adjacent land within MK Borough will not be built-out for a number of years. Having accounted for this greater weight, the Council finds the Eaton Leys site to perform notably worse than the other two sites. On this basis, Options 1, 3, and 4 should be taken forward for further consideration, as an element of district-wide spatial strategy alternatives."

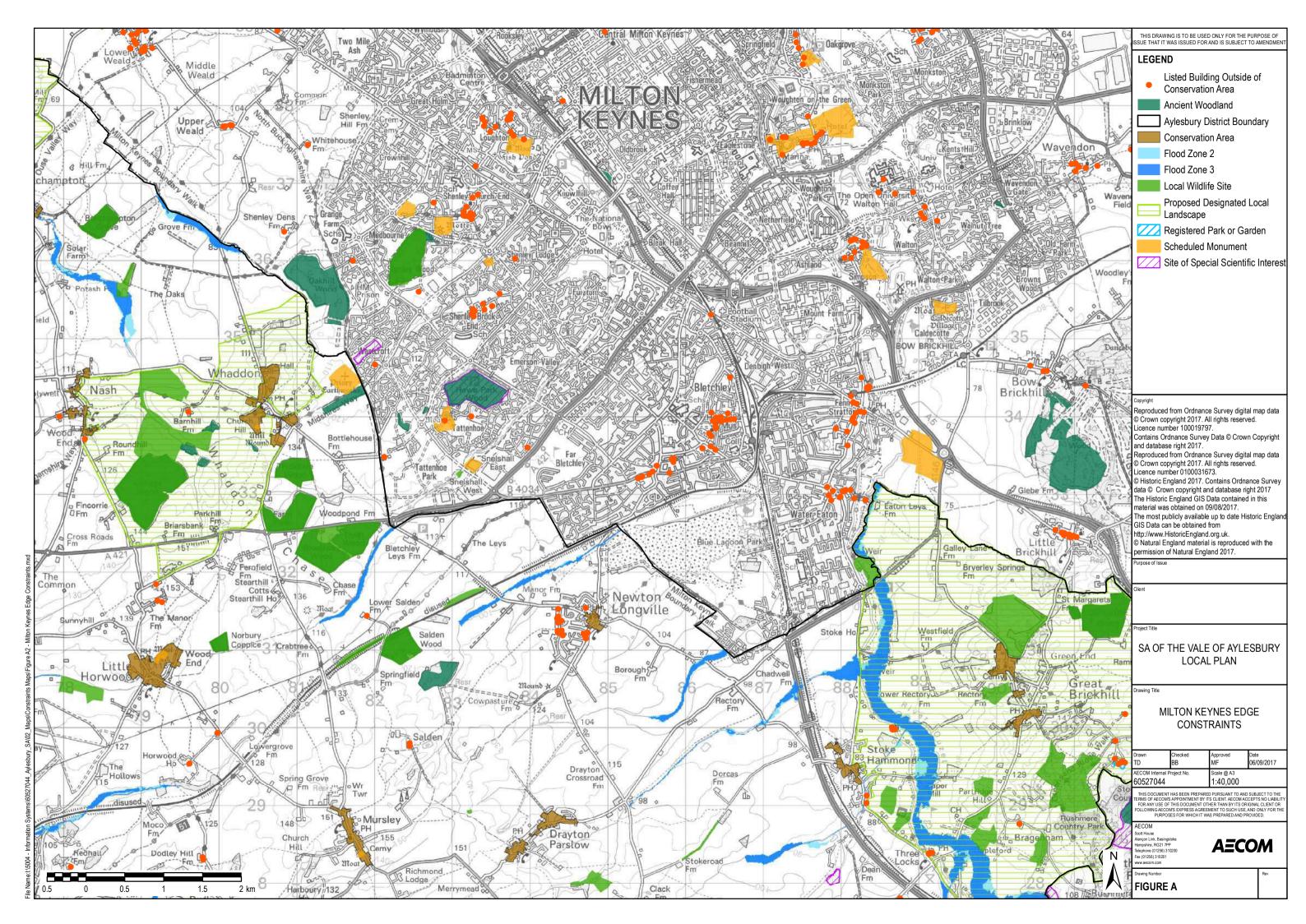


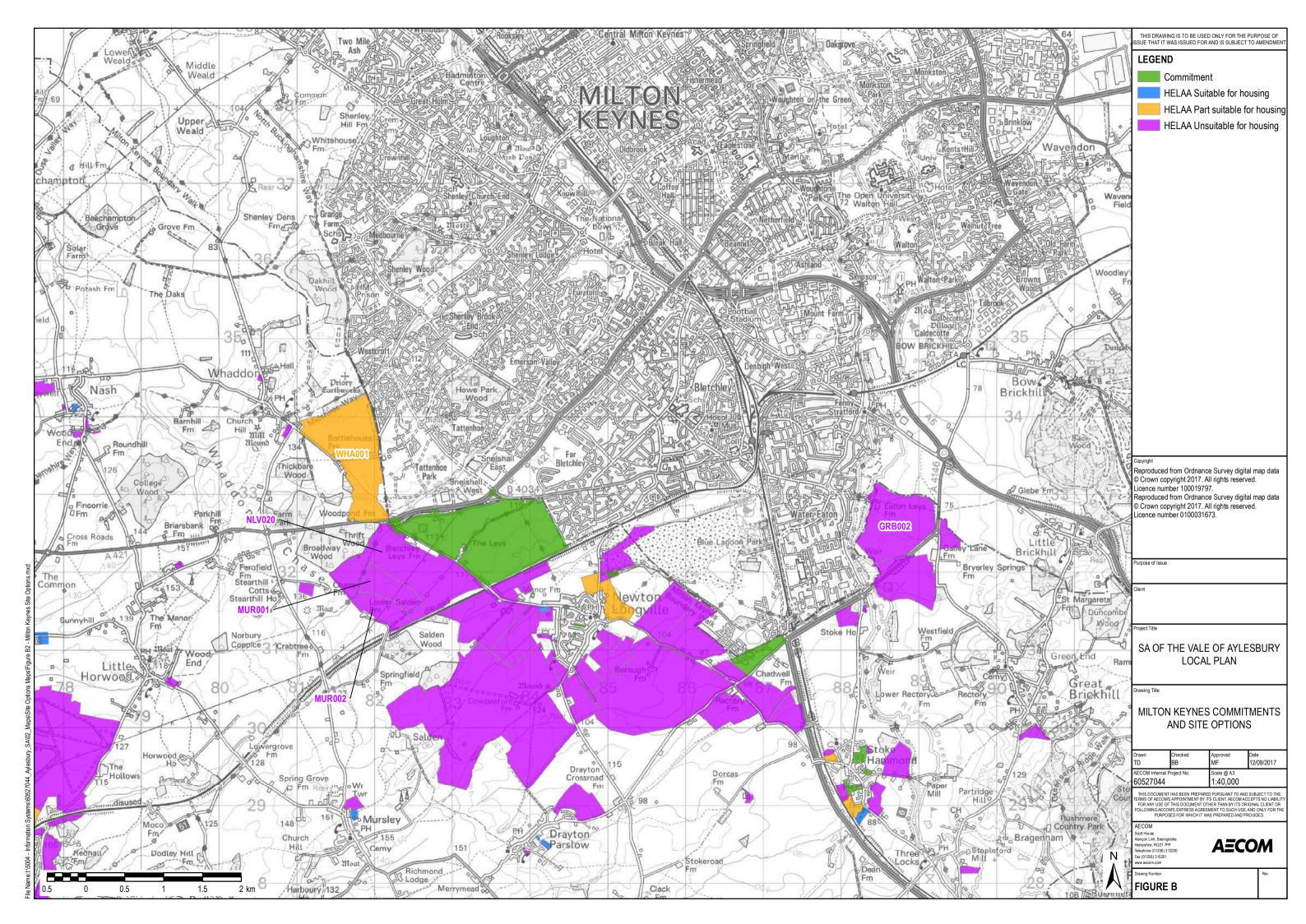
Note on maps

Figure A (Constraints) is self-evident, although one point to note is that there are some additional constraints not shown on the map, including: several locally designated 'Biological Notification Sites' and numerous areas identified as an 'Archaeological Notification Area'.

Figure B (Commitments and site options) should be understood as a map that seeks to 'take forward' the maps presented within the HELAA (January 2017) in three ways -

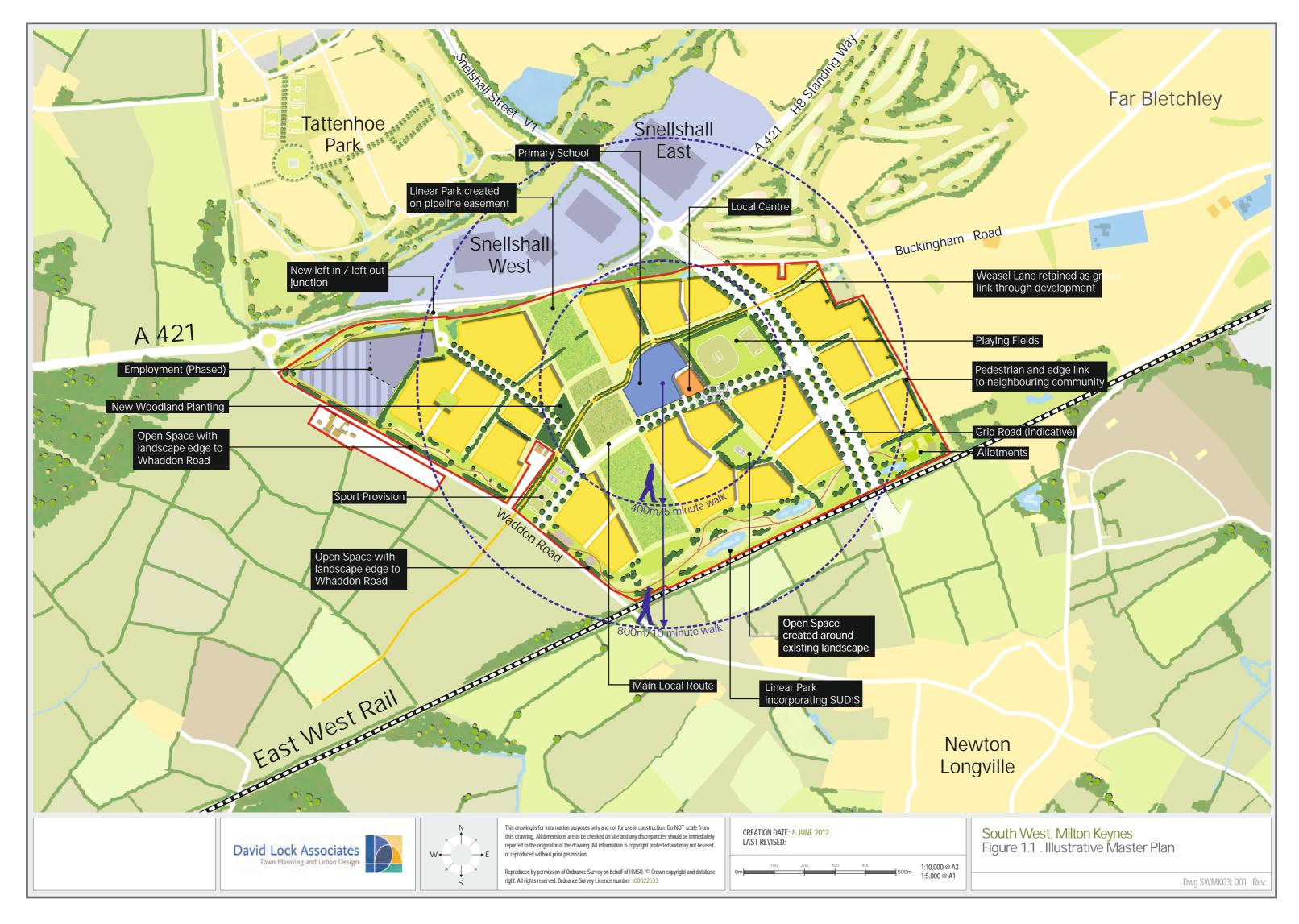
- 1) Sites that are now a commitment are shown as such.
- 2) Where work has been undertaken to define suitable areas of land within sites defined by the HELAA as 'part suitable', then the suitable area of land is shown as suitable and the remainder as unsuitable.
- 3) Where land within sites defined by the HELAA as 'part suitable' is now a commitment, then that part of the site is shown as being a commitment, and the remainder as unsuitable.





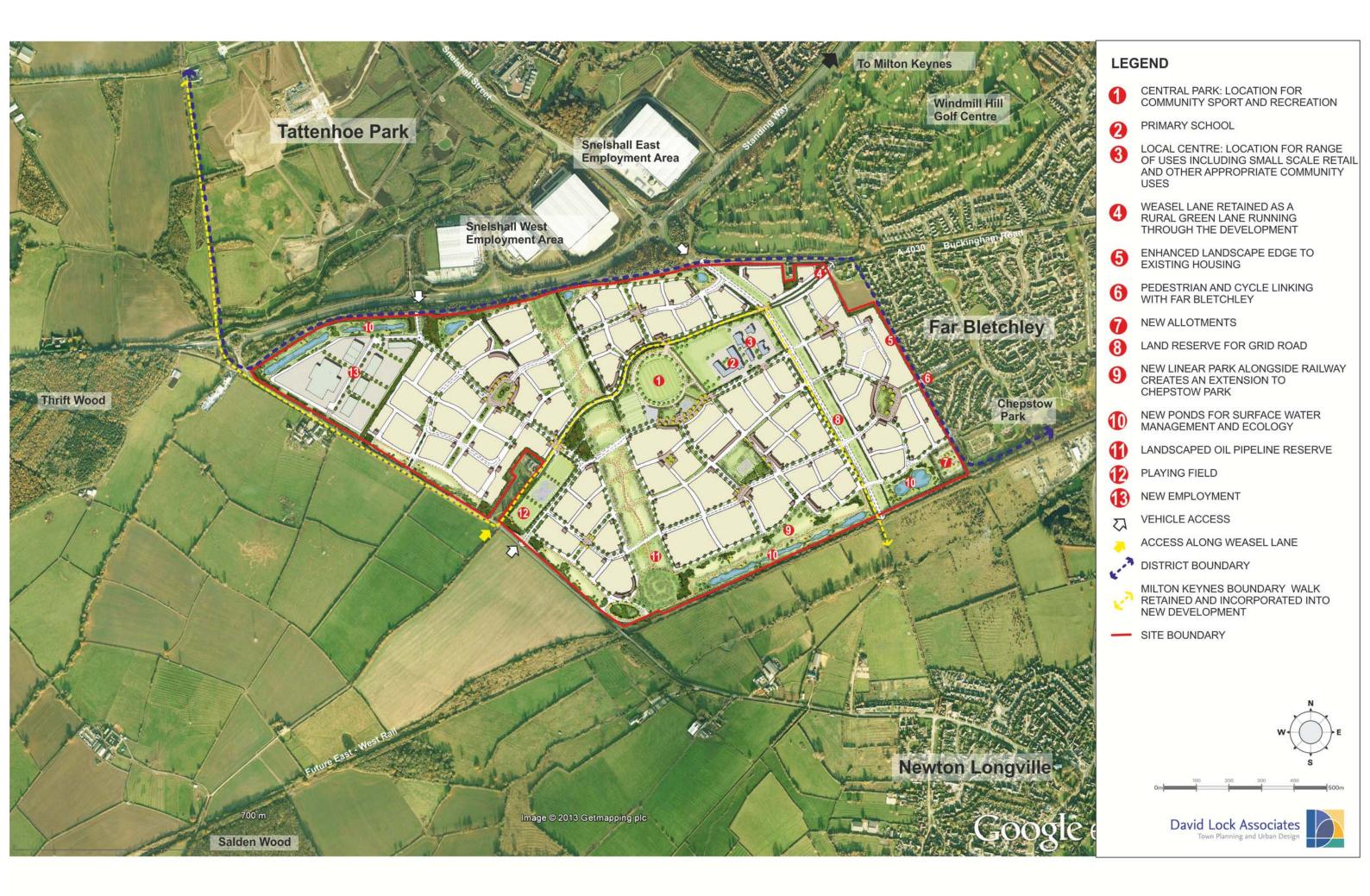
APPENDIX 3.3:

MASTERPLAN FIRST DRAFT - JUNE 2012



APPENDIX 3.4:

MASTERPLAN FIRST REVISION - APRIL 2013



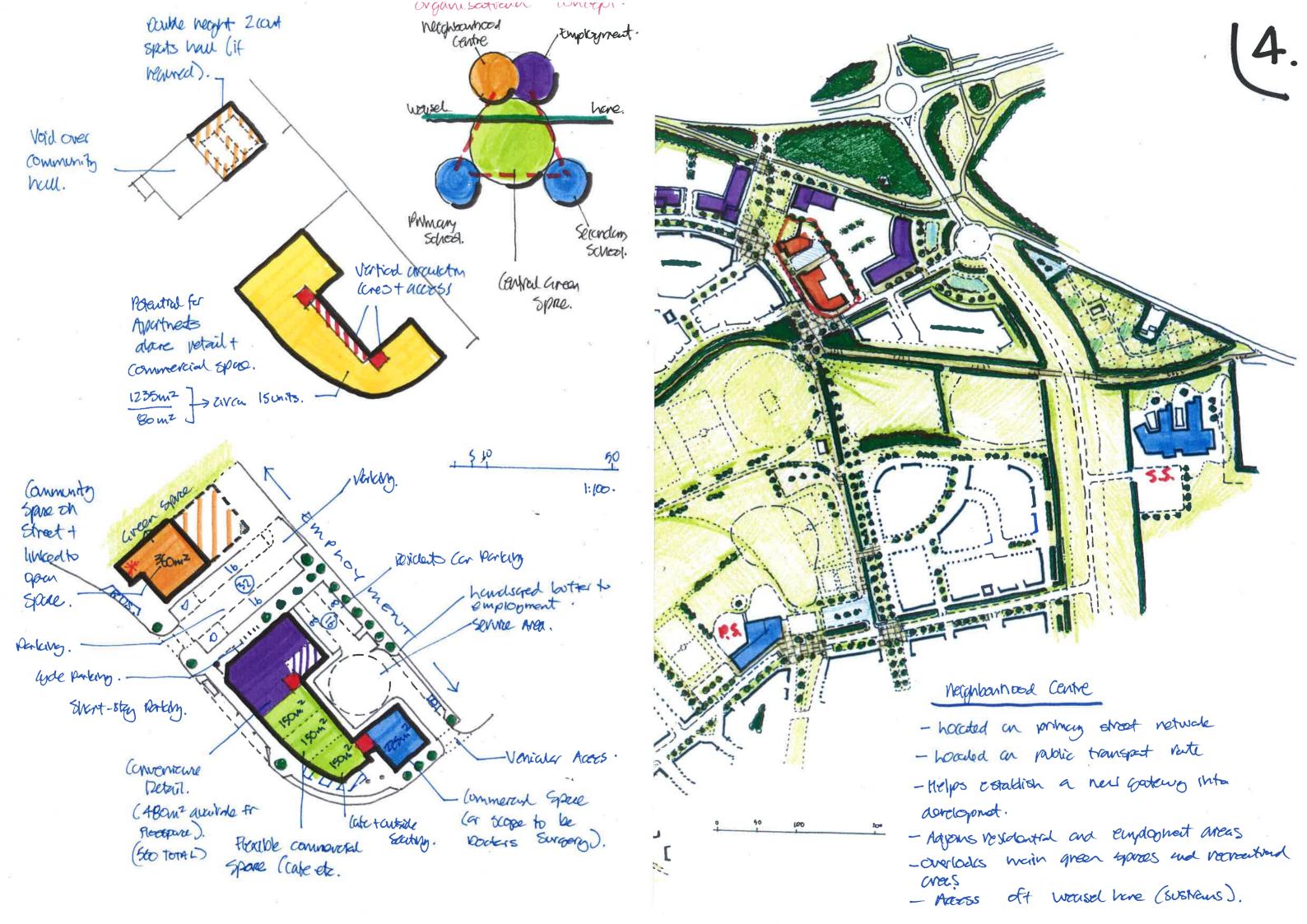
APPENDIX 3.6:

MASTERPLAN THIRD REVISION - SEPTEMBER 2013









APPENDIX 3.7:

MASTERPLAN FINAL FOR SUBMISSION – SEPTEMBER 2014

