part of the **WYG** group



Olney Neighbourhood Plan

2016 - 2031

Strategic Environmental Assessment Environmental Report

December 2016



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1.0 Introduction

1.0 Background

1.0.1 WYG has been commissioned to undertake an independent Strategic Environmental Assessment (SEA) in support of the emerging Olney Neighbourhood Plan (ONP). The ONP is being prepared, under the Neighbourhood Planning Regulations 2012, in accordance with the Localism Act 2011. The Plan, once adopted, will present planning policy and guidance for the forum area as part of the wider Development Plan. It will provide a spatial framework for determining planning applications up to 2031.

1.1 SEA Explained

- 1.1.1 SEA is a mechanism for considering and communicating the likely effects of a draft Plan, and alternatives, with a view to avoiding and mitigating adverse environmental effects and maximising the positives, where possible. SEA is a legally required process which must be undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations (2004) (the 'SEA Regulations') which were prepared in order to transpose into national law the European SEA Directive¹.
- 1.1.2 To meet the requirements of the SEA Regulations, a report (the 'Environmental Report') must be published for consultation alongside the draft Plan that presents information on the likely significant effects of implementing the Plan and reasonable alternatives. The report must then be taken into account, alongside consultation responses, when finalising the Plan.

1.2 The Environmental Report

- 1.2.1 This document comprises the Environmental Report for the Olney Neighbourhood Plan and must provide certain specified information, namely it must answer four questions:
 - 1) What is the scope of the SEA?
 - The parameters for the SEA must be established through a scoping exercise at the outset of Plan-making.

¹ Directive 2001/42/EC



- 2) What has plan-making / SEA involved up to this point?
- Preparation of the draft Plan must have been informed by at least one earlier Plan-making /
 SEA iteration. Reasonable alternatives must have been assessed.
- 3) What are the SEA findings at this stage?
- i.e. in relation to the draft Plan.
- 4) What happens next? (including monitoring).
- 1.2.2 Each of the above questions are answered in this Environmental Report. Figure 1, below, summarises the regulatory basis for answering these questions.

Environi	mental Report Question	Environmental Assessment of Plans and Programmes Regulations (2004) Requirements
	What is the plan seeking to achieve?	- An outline of the contents, main objectives of the Plan and relationship with other relevant plans and programmes
	What is the sustainability context?	 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 is the scope of the SEA?	What is the sustainability baseline?	 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 key issues and objectives that should be a focus?	- Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
What has plan-making / SEA involved up to this point?		 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 inlight of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft Plan



What are the SEA findings at this current stage?		 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
	What happens next?	- A description of the monitoring measures envisaged

Figure 1: Questions answered by the Environmental Report, in line with Regulatory requirements

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2.0 The Scope of the SEA

2.0 Introduction

- 2.0.1 This section of the Environmental Report outlines the scope of the SEA, and answers a number of questions as required by the SEA Regulations. These are:
 - What is the plan seeking to achieve?
 - What is the 'context'?
 - What is the 'baseline'?
 - What are the key issues and objectives that should be a focus of SEA?
- 2.0.2 Each of the scoping questions are answered for the following nine sustainability topics:
 - Air quality;
 - Biodiversity;
 - Climate change (including flood risk);
 - Economy and enterprise;
 - Health and well-being;
 - Historic environment and landscape;
 - · Land, soil and water resources;
 - Population and community; and
 - Transport.
- 2.0.3 The sustainability topics were identified based on the issues suggested by the SEA Regulations, the Council's Sustainability Appraisal (SA) of their own Local Plan and an appreciation of the ONP objectives. The scope of the SEA has been established through consulting with the consultation bodies, namely Natural England, the Environment Agency and English Heritage. The SEA Scoping Report was consulted on for over 5 weeks in order to

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meet the requirements of the SEA Regulations. Milton Keynes Council was also consulted for completeness.

2.0.4 The topics cover all three pillars of sustainable development (i.e. environmental, social and economic) rather than focusing solely on the environmental aspects of the Plan. This approach has been considered most appropriate given that sustainable development is a stated objective for Neighbourhood Plans. Also all Plans must demonstrate at examination that they meet the 'basic condition' of contributing towards sustainable development. Extending the scope of the SEA to give equal importance to each pillar of sustainable development is consistent with the approach taken for Local Plans when completing SA.

2.1 What is the Plan seeking to achieve?

- 2.1.1 In order to meet the requirements of the Regulations, the Environmental Report must include an outline of the contents, main objectives of the Plan and relationship with other relevant plans and programmes. The ONP, which incorporates the Parish of Olney, is currently being developed as a Neighbourhood Plan under the Localism Act 2012. The Milton Keynes Council Core Strategy identifies 1,760 dwellings to be delivered amongst rural communities within the Borough. Negotiations between the Olney Neighbourhood Plan Steering Group and the Council has resulted in an agreed requirement of 300 new dwellings on unspecified sites within the Parish within the plan period. The main purpose of the ONP will therefore be to identify the most appropriate locations for these new homes. The Plan will also propose policies for guiding employment, retail and community uses.
- 2.1.2 It is important to emphasise that the Plan will be strategic in nature, and so even the allocation of sites should be considered a strategic undertaking and process that omits consideration of some detailed site-specific issues that would be addressed through the

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planning application process. The strategic nature of the Plan is reflected by the scope of the SEA.

2.2 Vision and Objectives for the Plan

2.2.1 The vision and objectives for the ONP were developed following consultation between the Steering Group and residents to establish what the Plan sought to achieve. The overarching vision for the Plan is as follows:

"To maintain Olney as a thriving, dynamic and historic town, preserving where necessary, and improving where possible. To manage change in order to maximise the advantages and minimise the problems."

- 2.2.2 The core objectives of the ONP that have been created for the Plan are:
 - To ensure that all new housing meets both the Milton Keynes Council Core Strategy and Local Plan requirements, and also the requirements of the people of Olney;
 - To ensure that there is sufficient land available to meet future health and community needs;
 - To ensure that there is sufficient land available to meet future educational needs;
 - To allocate land for employment use and safeguard the existing Stilebrook Road Industrial Estate;
 - To allocate land for retail use;
 - To protect and enhance the character, appearance, vitality, viability and significance of the historic town centre, conservation area and other heritage assets in town;
 - To protect, enhance and provide additional open spaces, community facilities and sports
 and recreation facilities, both within the town, as part of the new development proposals
 and between the town and the River Ouse;
 - To improve parking, accessibility, pedestrian, and cycling routes throughout the town;
 - To reduce traffic problems; and

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• To use funds arising from developer contributions for improvements to community facilities and infrastructure.

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3.0 The Sustainability Context

3.0 Introduction

- 3.0.1 In order to comply with the Regulations, the Environmental Report must include:
 - The relevant sustainability objectives, established at international and national level; and
 - Any existing sustainability problems and issues which are relevant to the Plan including, in particular, those relating to any areas/populations etc. of particular importance.
- 3.0.2 This section presents a summary of the extensive context review presented within the SEA Scoping Report, together with additional contextual information.

3.1 Air Quality

- 3.1.1 The EU Thematic Strategy on Air Pollution² aims to reduce the number of annual premature deaths related to air pollution by almost 40% by 2020. The Strategy also seeks to reduce the areas of forest and other ecosystems being damaged from airborne pollutants.
- 3.1.2 The following messages from the National Planning Policy Framework (NPPF) are relevant:
 - Planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality
 Management Areas and the cumulative impacts on air quality from individual sites in local

² Commission of the European Communities (2005) Thematic Strategy on Air Pollution [online] Available at: http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=URISERV%3Al28159 Accessed 001/12/2016

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areas. Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan.

- New and existing developments should be prevented from contributing to, being put at an unacceptable risk from, or being adversely affected by unacceptable levels of air pollution.
- 3.1.3 The DEFRA report³ on action for air quality in a changing climate assessed the synergies between issues concerning air pollution and climate change. The report concluded that additional health benefits could be realised through the closer integration of climate and air pollution policy. It also suggested that potential co-benefits could be realised through a variety of means, including promoting low/zero carbon vehicles and renewable energy.
- 3.1.4 The Core Strategy seeks to manage increased travel demands through promoting improvements to public transport, rail links and encouraging an increased number of people to walk and cycle in order to deliver a better connected Milton Keynes. Other objectives include extending the grid road pattern into any new major development areas and utilising

³ DEFRA (2010) Air pollution: Action in a Changing Climate [online] Available at: https://www.gov.uk/government/publications/air-pollution-action-in-a-changing-climate Accessed 01/12/2016

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demand management measures to reduce the growth of road congestion, whilst upgrading key traffic routes.

3.2 Biodiversity

- 3.2.1 In May 2011 the EU Biodiversity Strategy⁴ was adopted to deliver an established new Europewide target to 'halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020.'
- 3.2.2 The following messages from the NPPF are considered relevant:
 - Contribute to the government's commitment to halt the overall decline in biodiversity by minimising impacts and achieving net gains in biodiversity wherever possible;
 - Set criteria based policies for the protection of internationally, nationally and locally
 designated sites, giving weight to their importance not just individually but as a part of a
 wider ecological network;
 - Promote the 'preservation, restoration and recreation of priority habitats, ecological networks' and the 'protection and recovery of priority species'. Plan for biodiversity at a landscape-scale across local authority boundaries;
 - Take account of the effects of climate change in the long term. Adopt proactive strategies
 to adaptation and manage risks through adaptation measures including green
 infrastructure (i.e. 'a network of multi-functional green space, urban and rural, which is

⁴ European Commission (2011) Our life insurance, our natural capital: an EU biodiversity strategy to 2020 [online] Available at:

http://ec.europa.eu/environment/nature/biodiversity/strategy/index_en.htm Accessed 01/12/2016

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capable of delivering a wide range of environmental and quality of life benefits for local communities');

- Plan positively planning for 'green infrastructure' as part of planning for 'ecological networks'; and
- High quality open spaces should be protected or their loss mitigated, unless a lack of need is established.
- 3.2.3 The Natural Environment White Paper⁵ (NEWP) sets out the importance of a healthy, functioning natural environment to sustained economic growth, prospering communities and personal well-being. It was in part a response to the UK's failure to halt and reverse the decline in biodiversity by 2010; it signalled a move away from the traditional approach of protecting biodiversity in nature reserves to adopting a landscape approach to protecting and enhancing biodiversity. The NEWP also aims to create a green economy in which economic growth and the health of our natural resources sustain each other and markets, business and government better reflect the value of nature. It includes commitments to:
 - Halt biodiversity loss, support functioning ecosystems and establish coherent ecological networks by 2020;
 - Establish a new voluntary approach to biodiversity offsetting to be tested in pilot areas;
 - Enable partnerships of local authorities, local communities and landowners, the private sector and conservation organisations to establish new Nature Improvement Areas; and
 - Address barriers to using green infrastructure to promote sustainable growth.
- 3.2.4 DEFRA's biodiversity strategy for England⁶ provides a strategic direction for biodiversity policy for implementing international and EU commitments. It suggests that development should be

⁵ DEFRA (2012) The Natural Choice: securing the value of nature [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/228842/8082.pdfn Accessed 02/12/2016

⁶ DEFRA (2011) Biodiversity 2020: A strategy for England's wildlife and ecosystem services [online] Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69446/pb13583-biodiversity-strategy-2020-111111.pdf Accessed 02/12/2016

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steered towards the best locations, encourage greener design and enable development to enhance natural networks. The Biodiversity Offsetting Green Paper⁷ presents options offsetting schemes tailored for England and its habitats and species, whilst also noting the Government's preference for giving developers the choice to use offsetting.

- 3.2.5 The Bucks & Milton Keynes Biodiversity Action Plan⁸ (BAP) was originally produced in 2000 by the Bucks Nature Conservation Forum and aims to translate the UK BAP to a local level. It describes how the wildlife of Bucks & Milton Keynes is going to be enhanced and protected over a ten-year period. It sets out the objectives of the partnership and outlines the BAP's intention to increase the extent of priority habitats, particularly focusing on Biodiversity Opportunity Areas (BOAs) as part of a targeted landscape-scale approach to priority habitat creation. The closest BOA to Olney is the Ouse Valley BOA which predominately comprises coastal and floodplain grazing marsh mixed with lowland wood-pasture and parkland.
- 3.2.6 The Milton Keynes Council Local Plan Core Strategy reflects the key messages from the NPPF and NEWP within its own policies. Policy CS19 The Historic and Natural Environment outlines how the Council will seek to protect important biodiversity features in the Borough:
 - Protect and enhance the hierarchy of national, regional and local sites within the Borough as well as BAP Priority Habitats and species;
 - Provide nationally designated sites and statutorily protected species with the highest level of protection;
 - Ensure that damage to the biodiversity and geological resource of the Borough will be avoided wherever possible. Where unavoidable it will be minimised through mitigation or if

⁷ DEFRA (2013) Biodiversity Offsetting in England Green Paper [online] Available at: https://consult.defra.gov.uk/biodiversity/biodiversity offsetting/supporting documents/20130903Biodiversity%20offsetting%20green%20paper.pdf Accessed 02/12/2016

⁸ Bucks Nature Conservation Forum (2010) Buckinghamshire and Milton Keynes Biodiversity Action Plan [online] Available at: http://www.bucksmknep.co.uk/wp-content/uploads/2014/11/Bucks-BAP-Forward-to-2020.pdf Accessed 02/12/2016

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mitigation is not possible, by compensation, by provision of replacement habitat of higher quality to achieve a net gain in biodiversity;

- Create and enhance habitats to help wildlife adapt to the impact of climate change;
- Seek opportunities for habitat protection, restoration and creation to meet the objectives
 of the UK and Bucks & Milton Keynes BAP and aims of the Biodiversity Opportunity Areas;
 and
- Support biodiversity recording and monitoring, in particular the work of the Buckinghamshire and Milton Keynes Environmental Records Centre.

3.3 Climate Change

- 3.3.1 The European Commission presented its strategy on climate change in 2007, to assess the costs and benefits of combating climate change. The report recommended a number of measures to limit global warming to 2°C9. In relation to energy, the Commission recommends that the EU's energy efficiency improves by 20% and the share of renewable energy grows to 20% by 2020.
- 3.3.2 The following messages from the NPPF are considered relevant:
 - Support the transition to a low carbon future in a changing climate as a core planning principle;
 - Planning for new development in locations and ways which reduce greenhouse gas emissions;
 - Actively supporting energy efficiency improvements to existing buildings;
 - Setting local requirements for building's sustainability in a way that is consistent with the Government's zero carbon buildings policy;

⁹ Commission of the European Communities (2007) Limiting Global Climate Change to two degrees Celsius: The way ahead for 2020 and beyond [online] available at: http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2007:0002:FIN:EN:PDF Accessed 02/12/2016.



- Encouraging transport solutions that support reductions in greenhouse gas emissions and reduce congestion;
- Direct development away from areas highest at risk of flooding, with development "...not
 to be allocated if there are reasonably available sites appropriate for the proposed
 development in areas with a lower probability of flooding." Where development is
 necessary, it should be made safe without increasing levels of flood risk elsewhere;
- Take account of the effects of climate change in the long term, taking into account a range of factors including flooding; and
- Adopt proactive strategies to adaptation and manage risks through adaptation measures including well planner green infrastructure.
- 3.3.3 The Committee on Climate Change prepared a guidance document in 2012 on methods for local authorities to reduce emissions and manage climate risk¹⁰. The guidance notes that planning functions are described as key levers in reducing emissions and adapting localities to a changing climate. Planning authorities are advised to use these to:
 - Enforce energy efficiency standards in new buildings and extensions;
 - Reduce transport emissions by concentrating new developments in existing cities and large towns and/or ensuring they are well served by public transport;
 - Work with developers to make renewable energy projects acceptable to local communities;
 - Avoid increasing the area's risk to climate change impacts by locating new development in areas of lowest flood risk; and
 - Plan for infrastructure such as low-carbon district heating networks, green infrastructure and sustainable drainage systems.

¹⁰ Committee on Climate Change (2012) How local authorities can reduce emissions and manage climate risk [online] Available at: https://www.theccc.org.uk/publication/how-local-authorities-can-reduce-emissions-and-manage-climate-risks/ Accessed 02/12/2016



- 3.3.4 In 2013 the Department for Transport (DfT) prepared a strategy for improving sustainable transport integration¹¹. It recommended four key areas for improvement in order for people to opt for sustainable transport:
 - Accurate, accessible and reliable information about the different transport options available for their journeys;
 - · Convenient and affordable tickets;
 - Regular and easy connections at all stages of the journey, including between different modes of transport; and
 - Safe and comfortable transport facilities.
- 3.3.5 DfT supports the use of smart ticketing to simplify journeys and improved connection at different stages of the journey through timetable co-ordination between operations. The report also considers the importance of transport facilities themselves, promoting investment in high quality stations and interchange hubs.
- 3.3.6 The EU's Water Blueprint¹² outlines actions that concentrate on better implementation of water legislation and integration of water policy objectives to reduce pressure on water resources, for example by using green infrastructure such as wetlands, floodplains and buffer strips along water courses. This would also reduce the EU's vulnerability to floods and droughts, emphasising the role water efficiency can play in reducing scarcity and water stress throughout the EU.

¹¹ Department for Transport (2013) Door to Door: A strategy for improving sustainable transport integration [online] Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/142539/door-to-door-strategy.pdf Accessed 02/12/2016

¹² European Commission (2012) A Blueprint to Safeguard Europe's Water Resources [online] Available at: http://ec.europa.eu/environment/water/blueprint/index en.htm Accessed 02/12/2016



- 3.3.7 The Flood and Water Management Act¹³ identifies a number of alternative measures to traditional engineering approaches to flood risk management. These include:
 - Using greater resilience measures into the design of new buildings, and retro-fitting properties at risk;
 - Utilising the environment in order to reduce flooding, for example through the management of land to reduce runoff and through harnessing the ability of wetlands to store water;
 - Identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere;
 - Planning to roll back development in coastal areas to avoid damage from flooding or coastal erosion; and
 - Creating sustainable drainage systems (SuDS).
- 3.3.8 The Milton Keynes Council Core Strategy recognises the important role planning has to play in delivering climate change mitigation and adaption measures within future development. Section 12 of the spatial strategy, Tackling Climate Change and Building Sustainable Communities (paragraph 12.13), states that:
 - "The implications of designing for climate change need to be given as much consideration as more traditional design concerns, such as legibility and appearance, to ensure new communities are environmentally sustainable."
- 3.3.9 Several policies seek to deliver on the Council's climate change mitigation and adaption objectives, including:

¹³ Flood and Water Management Act (2010) [online] Available at: http://www.legislation.gov.uk/ukpga/2010/29/contents Accessed 02/12/2016

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- Policy C12 requires development to ensure flood water management is planned at the largest appropriate scale, and wherever possible, designed as public open space; and
- Policy CS13 promotes integrating energy efficiency and solar performance in new development, and providing sustainable and strategic surface water drainage.

3.4 Economy and Enterprise

- 3.4.1 Europe 2020, published in 2010, comprises the EU's growth strategy for smart, sustainable and inclusive growth for the decade¹⁴. The strategy focuses on smart growth by developing knowledge and innovation, sustainable growth based on resource efficient and a competitive economy and inclusive growth aimed at strengthening employment and social cohesion.
- 3.4.2 The following key messages from the NPPF have been identified:
 - The planning system can make a contribution to building a strong, responsive economy by 'ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure';
 - Capitalise on 'inherent strengths', and to meet the 'twin challenges of global competition and of a low carbon future';
 - Support new and emerging business sectors, including positively planning for 'clusters or networks of knowledge driven, creative or high technology industries';
 - · Support competitive town centre environments;
 - Edge of town developments should only be considered where they have good access. This
 should be followed with an impact assessment to ensure the town centre remains viable in
 the long term;

¹⁴ European Commission (2010) Europe 2020 [online] Available at: http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2010:2020:FIN:EN:PDF Accessed 02/12/2016



- Enhance and retain markets is also outlined; and
- Support the sustainable growth and expansion of all types of business and enterprise in rural areas and promote the development and diversification of agricultural and other land-based rural businesses.
- 3.4.3 Key messages from the Milton Keynes Core Strategy relevant to this topic are:
 - Olney is defined as a Key Settlement and so is expected to accept development to support
 the growth of business and enterprises in the rural area. Olney, as a Key Settlement, has
 the best relative public transport service, the most facilities and serves surrounding
 villages and their own residents;
 - 216.3 hectare of employment land is identified for employment-led development across
 the Borough, including strategic allocations at Magna Park (Eastern and Western
 expansion areas) and Eagle Farm North;
 - Plan:MK will address the necessity for further employment allocations to increase the supply of sites where evidence of need is established.
- 3.4.4 Proposals for employment-led development within the ONP will need to demonstrate that they provide for a range of employment growth in Olney, in ensuring that it remains a rural area of economic importance in Milton Keynes.

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3.5 Health and Wellbeing

- 3.5.1 The following key messages from the NPPF have been identified:
 - The social role of the planning system involves 'supporting vibrant and healthy communities';
 - A core planning principle is to 'take account of and support local strategies to improve health, social and cultural wellbeing for all';
 - The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities';
 - Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship;
 - Set out the strategic policies to deliver the provision of health facilities;
 - Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities; and
 - Planning policies should aim to avoid noise from giving rise to significant adverse impacts on health and quality of life.
- 3.5.2 The Marmot Review into health inequality in England¹⁵ investigated, through an evidence based strategy, methods to address the social determinants of health, the conditions in which people are born, grow, live work and age and which can lead to health inequalities. A supplementary report into health inequalities¹⁶ in England was produced to provide additional evidence relating to spatial planning and health. It established that there was evidence that

¹⁵ The Marmot Review (2010) The Marmot Review: Implications for Spatial Planning [online] available at: http://www.instituteofhealthequity.org/projects/fair-society-healthy-lives-the-marmot-review Accessed 1/11/2016

¹⁶ The Marmot Review (2011) Implications for spatial planning [online] Available at: http://www.apho.org.uk/resource/item.aspx?RID=106106 Accessed 02/12/2016

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health and environmental inequalities are linked and that poor environments contribute to poor health and inequality.

- 3.5.3 The Health and Social Care Act (2012)¹⁷ has increased the role that local authorities are expected to provide in providing health outcomes. It transferred responsibility for public health from the National Health Service to local government, giving local authorities a duty to improve the health of the people living in their areas. This will require a more holistic approach to health across all local government functions.
- 3.5.4 Key messages from the Milton Keynes Core Strategy include:
 - Olney is defined as a Key Settlement which is protected by the Council in order to protect
 viable employment sites to maintain the services and facilities to sustain the town as a
 sustainable community;
 - Green space within the town is considered important as a recreational resource locally;
 and
 - New development that generates a demand for infrastructure will only be permitted if the necessary on and off-site infrastructure required to support and mitigate the impact of that development is delivered.

3.6 Historic Environment and Landscaping

3.6.1 The NPPF requires that planning authorities should seek to sustain or enhance the significance of all heritage assets and that substantial harm to designated heritage assets should be wholly exceptional. It also states that archaeological remains (in particular) that are of national interest should be treated similarly. It advises that planning authorities should seek to avoid or minimise conflict between the need to conserve heritage assets (either designated or non-designated) and any aspect of a proposal under consideration. Where development could result in harm to heritage assets that cannot be avoided (including through the development of alternative sites),

¹⁷ HM Government (2012) Health and Social Care Act 2012 [online] Available at: http://www.legislation.gov.uk/ukpga/2012/7/contents/enacted Accessed 08/12/2016

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it requires that this be clearly justified on the basis of public benefits that could not otherwise be delivered.

- 3.6.2 The NPPF is supplemented by English Heritage's risk register¹⁸, which identifies every heritage asset at risk in the UK. The assets are split into a number of categories including buildings, monuments, places of worship, scheduled monuments, registered parks and gardens, battlefields, protected wreck sites and conservation areas. The Government's Statement on the Historic Environment for England¹⁹ sets out its vision for the historic environment, calling on decision makers to recognise its value and manage it in an intelligent manner in light of its contribution to social, economic and cultural life. It promotes the role of the historic environment under the Government's remit for responding to climate change and the wider sustainable development agenda.
- 3.6.3 The Milton Keynes Core Strategy recognises the rich and diverse heritage context of the Borough. It seeks to ensure that all designated, and other non-designated but important assets, are conserved and where possible enhanced. Policy CS19 requires development proposals to consider the character, appearance and setting of sites, buildings, structures, areas, parks and gardens and landscapes that are of historic, architectural, cultural, or archaeological significance. The Strategy also requires a high standard of design to be adopted in all new development proposals, to make a positive contribution to the character of the area in which it is located, as per Policy CS13. This includes extensions, alterations and changes of use to existing buildings.
- 3.6.4 In preparing the draft Plan, the ONP Steering Group have reviewed the Milton Keynes

 Landscape Character Assessment²⁰ as a key source of evidence on the character of nondesignated landscapes in the Plan. In addition, the Steering Group have taken into

¹⁸ English Heritage (2012 Heritage at Risk [online] Available at: https://historicengland.org.uk/advice/heritage-at-risk/ Accessed 05/12/2016

¹⁹ HM Government (2010) The Government's Statement on the Historic Environment for England [online] Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/229834/Acc_Heritage_ Vision_Part1.pdf Accessed 05/12/2016

²⁰ Milton Keynes Council (2007) Milton Keynes Landscape Character Assessment [online] Available at: https://www.milton-keynes.gov.uk/planning-and-building/planning-policy/landscape-character-assessment Accessed 05/12/2016

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consideration when assessing plan options and their potential impact on the historic environment the Milton Keynes Historic Environment Record (HER)²¹ as the record of non-designated heritage assets.

3.7 Land, Soil and Water Resources

- 3.7.1 The EU's Soil Thematic Strategy²² presents a strategy for protecting soil resources in Europe. The main aim of the strategy is to minimise soil degradation and limit associated detrimental effects linked to water quality and quantity, human health, climate change, biodiversity, and food safety. It seeks to ensure that planning decisions are made to maintain the sustainability of soils, consistent with a 'precautionary principle' used by the EU in establishing environmental policy.
- 3.7.2 The EU's Blueprint to Safeguard Europe's Water Resources²³ points out the Member States should reduce pressure on water resources through using green infrastructure measures such as wetlands, floodplains and buffer strips along water courses. These initiatives would help reduce the EU's vulnerability to flood and drought. National water policies are driven by the EC Water Framework Directive which has been translated into national law by the Water Framework Regulations (2003). The Directive outlines a number of key aims including:
 - Improving the quality of rivers and other water bodies to good ecological status;
 - Considering flood risk at all stages of the plan and development process in order to reduce future damage to property and loss of life; and
 - Incorporating water efficiency measures into new developments.

 $^{^{21}}$ The HER is a database of information held in the Civic Offices and is accessible through appointment.

²² European Commission (2006) Soil Thematic Policy [online] Available at: http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52012DC0046 Accessed 05/12/2016

²³ European Commission (2012) A Blueprint to Safeguard Europe's Water Resources [online] Available at: http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52012DC0673 Accessed 05/12/2016



- 3.7.3 At the national level, Safeguarding our Soils: A Strategy for England²⁴, and Water For Life²⁵, both prepared by DEFRA, set out a vision and strategy for soil use and water resilience in England. The Report includes measures to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources.
- 3.7.4 The Government Review of Waste Policy in England²⁶, a commission to consider waste management, recognises that a more sustainable approach to the use of materials can promote economic growth and environmental benefits. It sets out a vision to move away from our current throwaway society in favour of a zero waste economy. The report recognises the important role of planning in delivering on this ambition, and notes that planning authorities should consider the infrastructure needs of their community during planmaking.
- 3.7.5 Key messages from the NPPF which relate to this topic include:
 - To protect and enhance soils as well as the value of best and most versatile (BMV)
 agricultural land;
 - Prevent new or existing development from being adversely affected by the presence of unacceptable levels of soil pollution or land instability and be willing to remediate and mitigate despoiled, degraded, derelict, contaminated and unstable land, where appropriate;

²⁴ DEFRA (2009) Safeguarding our Soils: A strategy for England [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69261/pb13297-soil-strategy-090910.pdf Accessed 05/12/2016

²⁵ DEFRA (2011) Water for Life [online] Available at: http://www.official-documents.gov.uk/document/cm82/8230/8230.pdf Accessed 4/11/2016

²⁶ DEFRA (2011) Government Review of Waste Policy in England [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69401/pb13540-waste-policy-review110614.pdf Accessed 05/12/2016

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- Encourage the effective use of land through the reuse of brownfield land, provided that this is not of high environmental value;
- Whilst there is no longer a national requirement to build at a minimum density, the NPPF requires local planning authorities to set out their own approach to housing density to reflect local circumstances;
- Produce strategic policies to deliver the provision of a variety of infrastructure, including that necessary for water supply; and
- With regards to waste, the NPPF does not contain any specific waste policies as waste planning policy will be published as part of the National Waste Management Plan.

3.8 Population and Community

3.8.1 Key messages from the NPPF include:

- To boost significantly the supply of housing, local planning authorities should meet the
 full, objectively assessed need for market and affordable housing in their area. They
 should prepare a Strategic Housing Market Assessment to assess their full housing needs,
 working with neighbouring authorities where housing market areas require cross
 administrative boundary thinking. The Strategic Housing Market Assessment should
 identify the scale and mix of housing and the range of tenures that the local population is
 likely to need over the plan period;
- To create sustainable, inclusive and mixed communities authorities should ensure provision of affordable housing onsite or externally where robustly justified;
- In rural areas, when exercising the duty to cooperate with neighbouring authorities, local
 planning authorities should be responsive to local circumstances and plan housing
 development to reflect local needs, particularly for affordable housing, including through
 rural exception sites where appropriate. Authorities should consider whether allowing
 some market housing would facilitate the provision of affordable housing to meet local
 needs;
- Design is indivisible from sustainable development, and development should improve the quality of the area over its lifetime, not just in the short term. Good architecture and

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landscaping are important, with the use of design codes contributing to the delivery of high quality outcomes;

- Design should reinforce local distinctiveness, raise the standard more generally in the area and address the connections between people and places;
- Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship;
- Ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.
 Places should contain clear and legible pedestrian routes, and high quality public spaces, which encourage the active and continual use of public areas; and
- Ensuring that there is a 'sufficient choice of school places' is of 'great importance' and there is a need to take a 'proactive, positive and collaborative approach' to bringing forward 'development that will widen choice in education'.
- 3.8.2 Shelter prepared The Housing Report²⁷ in 2013 which analysed the Government's performance on housing delivery. In regards to housing supply, disappointing starts and completions figures are stunting progress in boosting housing supply which remains low. Overcrowding is a significant issue to quality of life, which is worsening, with measures to resolve the issue not gaining sufficient traction. In turn, homelessness and families in temporary accommodation are increasing, which may have been exacerbated by the further cuts to housing benefit. However, the preventative approach to evictions, repossessions and arrears has meant that more home owners experiencing difficulty with mortgage payments have been supported.

²⁷ Shelter (2013) The Housing Report 3 [online] Available at: http://england.shelter.org.uk/ data/assets/pdf file/0003/601473/Housing Report 3 FINAL.pdf Accessed 05/12/2016

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- 3.8.3 The Select Committee on Public Service and Demographic Change²⁸ argue that the housing market is not delivering sufficient specialist housing for older people than is needed. The Committee note caution to central and local Government, housing associations and house builders for urgency to ensure that the housing needs of the increasing elderly population are addressed. Priority should be given to promoting adequate market and social housing.
- 3.8.4 Key messages from the Core Strategy in relation to this topic are:
 - Approximately 16% of the population of the Borough live in the rural area surrounding Milton Keynes itself;
 - Olney is a Key Settlement which is considered a sustainable rural settlement taking into account population, constraints, transport links and the capacity of services;
 - The housing target for the rural settlements is 1,760 to be provided between 2010 and 2026, with sites to be identified through the Neighbourhood Plan process; and
 - Affordable housing provision of 30% should be provided on-site, for sites of 15 or more units, subject to site and market conditions (as per Local Plan Saved Policies H4 and H5).

3.9 Transport

- 3.9.1 European and UK transport policies and plans place emphasis on the modernisation and sustainability of the transport network. Specific objectives include reducing pollution and road congestion through improvements to public transport, walking and cycling networks and reducing the need to travel. National policy also focuses on the need for the transport network to support sustainable economic growth.
- 3.9.2 The design, location and layout of development and investment in infrastructure are manifest through regional and local plans. The Local Transport Plan 3 for Milton Keynes (LTP3)²⁹,

²⁸ Select Committee on Public Service and Demographic Change (2013) Ready for Ageing? [online] Available at: http://www.publications.parliament.uk/pa/ld201213/ldselect/ldpublic/140/14002.htm Accessed 05/12/2016

²⁹ Milton Keynes Council (2013) Local Transport Plan 3 [online] Available at: https://www.milton-keynes.gov.uk/coin/group/473?l=L&page=3 Accessed 05/12/2016

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adopted in 2011, sets out a number of objectives for the borough-wide Transport Vision and Strategy:

- Provide real and attractive transport choices to encourage more sustainable travel behaviour as Milton Keynes grows;
- Support the economic growth of the Borough through the fast, efficient and reliable movement of people and goods;
- Reduce transport based CO2 emissions to help tackle climate change;
- Provide access for all to key services and amenities in Milton Keynes, including employment, education, health, retail, and leisure;
- Improve safety, security and health;
- Contribute to quality of life for all Milton Keynes residents, strengthening linkages between communities; and
- Establish a development framework that embraces technological change, in which Milton Keynes can continue to grow, pioneer and develop.
- 3.9.3 Core Strategy Policy CS11, in relation to transport, states that the Council will work with neighbouring authorities and transport providers to promote a well-connected Milton Keynes. This includes increased movement of people and goods, improved accessibility across the Borough, improved safety and quality of life and a reduction in the Borough's carbon footprint. This will be achieved by a number of measures, including:
 - Improvements to the core public transport network, with Central Milton Keynes at is centre, to cater for specific areas and types of public transport need;
 - More sustainable choices of transport for car owners to encourage non-car modes for more journeys including demand management;
 - Encouraging cycling and walking through improvements to the Redway network and other paths, with better integration with transport interchange hubs; and



- Ensuring new development is well served by public transport and is easily accessible by walking and cycling.
- 3.9.4 The Milton Keynes Council Local Investment Plan³⁰ outlines the investment mechanisms required to support the delivery of growth, including improvements to walking and cycling routes, public transport and associated facilities.

³⁰ Milton Keynes Council (2015) Local Investment Plan [online] Available at: https://www.milton-keynes.gov.uk/planning-and-building/growing-mk/local-investment-plan Accessed 05/12/2016

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4.0 The Sustainability Baseline

4.0 Introduction

- 4.0.1 In order to comply with the Regulations, this report must include the following:
 - The relevant aspects of the current state of the sustainability baseline and the likely evolution thereof without implementation of the Plan;
 - The characteristics of areas/populations likely to be significantly affected; and
 - Any existing sustainability problems or issues which are relevant to the Plan including, in particular, those relating to any areas or problems of particular importance.
- 4.0.2 This section presents a summary of the problems and issues identified through the context review so they are more locally specific, which is important to help identify and evaluate likely significant effects associated with the Plan and the alternatives considered. Set out below is an update to the baseline review presented within the SEA Scoping Report.

4.1 Air Quality

The current state of the environment

4.1.1 Existing air quality issues in the Plan area are closely linked to traffic and congestion on the A509, a key haulage route which bisects Olney town centre. This has led to the declaration of an AQMA in central Olney following a detailed assessment of nitrogen dioxide concentrations. Ongoing monitoring by the Council³¹ (last completed in 2015) has confirmed that the AQMA is still required as the annual mean nitrogen dioxide objective is still being exceeded in Olney. Most particularly, the highest exceedances of the annual mean objective (40 μ g/m³) are at Bridge Street (41.3 μ g/m³) and High Street South (40.5 μ g/m³).

The likely evolution thereof should the plan or programme not be implemented

4.1.2 The delivery of the apportioned allocation of 300 dwellings in the ONP area has the potential to have additional effects on air quality through increased traffic flows. This is a risk for the

³¹ Milton Keynes Council (2015) Air Quality Updating and Screening Assessment for Milton Keynes Council

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air quality within the AQMA, which is particularly at risk to increases in nitrogen dioxide and particulate emissions.

4.1.3 This may be offset in part by factors such as measures implemented through the Milton Keynes LTP3 in the improved economy and efficiency of vehicles and encouraging a modal shift from private car use to reduce transport based emissions. Also, delivery of the bypass route would also alleviate congestion and emissions problems within the town centre as the majority of haulage and private cars would be re-routed to the east or west of Olney.

4.2 Biodiversity

The current state of the environment

- 4.2.1 The Plan area does not contain any sites internationally designated for nature conversation purposes, nor the Borough itself. The closest nationally designated biodiversity site is located 2.7km to the north west of Olney, which is the Yardley Chase SSSI. This designated extends northwards into Northamptonshire and features a high composition of native broadleaved, mixed and yew woodland. The SSSI condition assessment, last completed in 2013³², suggests that the site is deemed to be in unfavourable but improving condition.
- 4.2.2 Within Olney Parish, there are no areas designated as SNCIs within the parish. A belt of Wildlife Corridor extends west, south and east of the defined settlement boundary around the Parish, including Emberton Country Park. This is a locally defined biodiversity classification to recognise the site's local importance for biodiversity conservation value. There is also a Local Wildlife Site to the south west of the settlement boundary. In relation to geodiversity, there are no SSSIs within or near Olney Parish designated for geodiversity, nor are there any Regionally Important Geological Sites (RIGS).
- 4.2.3 The Bucks & Milton Keynes BAP identifies a number of priority habits that are characteristic of the area. There is a key area of BAP Priority Habitat in the Plan area, the Ouse Valley BOA which comprises floodplain grazing marsh mixed with lowland wood-pasture and parkland.

https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=s1004179

³² Condition summary can be found at:

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The likely evolution thereof should the plan or programme not be implemented

4.2.4 Sites of biodiversity importance have the potential to come under increasing pressures from future development which will lead to an increase in Olney's population. This includes through direct loss of habitat through development and impacts on biodiversity networks, which could be intensified through the effects of climate change. This could alter the distribution and concentration of biodiversity and materially change the character and composition of habitats. The Parish is located within the impact zone of a SSSI, which suggests that housing allocations could present a risk to the condition of the SSSI. However, there are opportunities for net biodiversity gains through measures of habitat creation and integration through promoting green infrastructure networks in the Plan area.

4.3 Climate Change

The current state of the environment

- 4.3.1 Research by the UK Climate Projections team³³ has identified the likely effects of climate change for the South East by 2050 for a number of emissions scenarios. For a medium emissions scenario, the temperature effects of climate change are likely to be as follows:
 - The central estimate of increase in winter mean temperatures is 2.2°C and an increase in summer mean temperatures of 2.8°C; and
 - The central estimate of change in winter mean precipitation is 16% and -19% for the summer mean precipitation.
- 4.3.2 Resulting from these changes, a number of potential risks may exist for the Plan area. These include:
 - Effects on water resources from climate change;
 - Reduction in availability of groundwater for abstraction;
 - Increased risk of 'one-off' weather events such as flash flooding;
 - Increased risk of injuries and deaths due to increased number of storm events;
 - Changes in insurance provisions for flood damage;

³³ The Met Office (2009) Climate Projections [online] Available at: http://ukclimateprojections.metoffice.gov.uk/ Accessed 06/12/2016



- A need to increase the capacity of wastewater treatment plants and sewers;
- A need to upgrade flood defences;
- Risk of soil erosion due to flash flooding;
- Need to control water run-off from surrounding agricultural land;
- Loss of species and threat to ecosystems;
- Deterioration in working conditions; and
- Increased demand for air conditioning and need to retrofit homes.
- 4.3.3 In regards to greenhouse gas emissions, data collated by the Department of Energy and Climate Change confirms that the Borough has lower per capita emissions than the county-wide and national averages. The Borough has seen greater reductions in emissions per capita between 2005 and 2012 by 24%, compared to Buckinghamshire (15.4% reduction) and England (17.7% reduction).
- 4.3.4 The Plan area is exposed to medium and high risk of flooding from river sources, as a result of the channel and flood plain of the River Great Ouse which wraps around the south and east of the town. Other tributaries extend northwards of the village which also present some risk of flooding. Some areas of the Parish are also exposed to high risk of surface water flooding, particularly along the banks of the River Great Ouse.
 - The likely evolution thereof should the plan or programme not be implemented
- 4.3.5 Climate change has the potential to increase the occurrence of extreme weather events in Olney. This is likely to include increases in mean summer and winter temperatures, decreases in mean precipitation and increases in mean precipitation in winter. The risk of flooding from fluvial flooding and surface water has the potential to increase as the effects of climate change become apparent on water bodies. This could result in greater 'one-off' flash flooding events. In terms of climate change mitigation, per capita emissions of greenhouse gas emissions are likely to continue to decrease as energy efficiency measures improve and

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renewable energy technology becomes more widely utilised. Road transport has the potential to continue to be the largest contributor to greenhouse gas emissions in the wider area.

4.4 Economy and Enterprise

The current situation

- 4.4.1 Economic activity rates in the Plan area highlight that a higher proportion of residents are employed in managerial, professional and technical positions (55.8%) than the Borough-wide and national averages. The proportion of Olney Ward residents working in administration, skilled trade and personal services are broadly similar to Borough-wide and national averages. The proportion of residents employed in sales and customer services, plant and machinery operative and in elementary occupations is lower than Milton Keynes and national levels.
- 4.4.2 The academic profile of Olney residents demonstrates that there are a significantly higher proportion of residents with Level 4 qualifications and above (44.1%) than Milton Keynes (30.2%) and the national average (29.7%). Only 7.6% of residents have no qualifications, which is somewhat lower than the Borough-wide average (12.5%) and the average for England and Wales (15%).

The likely evolution thereof should the plan or programme not be implemented

4.4.3 The occupational profile of the Plan area is positive, with a higher proportion of workers in managerial, professional and technical sectors which suggests that the local economy is relatively affluent. As a result, the local economy has a greater spending power than national, regional and Borough-wide averages. The vitality of manufacturing and elementary occupations could lead to negative effects in terms of the local economy should these industries scale down operations or relocate (albeit they only contribute a modest contribution to total employment currently).

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4.5 Health and Wellbeing

The current situation

- 4.5.1 In comparison to national averages, general health across Olney Ward is broadly favourable, with 87.2% of the population's health classified as very good or good. The proportion of residents with bad or very bad health is lower than Borough-wide and national averages.
- 4.5.2 However, there remain a number of challenges for the Plan area relating to health. The Milton Keynes Health Profile³⁴ found that expected life expectancy in Milton Keynes Borough is statistically lower than the national averages. Life expectancy is 78.7 years for men and 82.5 years for women, below the national averages of 79.2 years and 83 years respectively. The difference in life expectancy between the most and least deprived is 7.1 years lower for men and 5.3 years lower for women.

The likely evolution thereof should the plan or programme not be implemented

4.5.3 The population of the ONP areas is expected to grow and age in the future. This will place pressure on existing health and community facilities that are likely to face greater demand from residents; although it should be noted that the Core Strategy makes provision for health facilities to support growth. Obesity is seen as an increasing issue by health professionals, and one that will contribute to significant health impacts on individuals, including increasing the risk of a range of diseases, including heart disease, diabetes and forms of cancer.

4.6 Historic Environment and Landscaping

The current situation

4.6.1 The Plan area has a rich historic environment, featuring a number of heritage assets and features which gives the area its sense of place and identity. It is defined by its dense cluster of listed buildings within the Olney Conservation Area including the medieval outline of the town. There is a Scheduled Monument to the north of the town which comprises the remains

³⁴ Public Health England (2015) Milton Keynes Health Profile 2015 [online] Available at: http://www.apho.org.uk/resource/item.aspx?RID=171940 Accessed 07/12/2016



- of an Iron Age and Roman settlement which can be identified both through aerial photography and excavation.
- 4.6.2 Excavation in the immediate environs has suggested remains are also present on adjacent land, including a number of linear features that may extend outwards beyond the scheduled area creating a zone around the Scheduled Monument located on land to the east of the A509. The Scheduled Monument is currently recorded as 'at Risk' on the national register maintained by Historic England³⁵ as a result of damage to buried remains by ploughing.
- 4.6.3 There is a second Scheduled Monument, Olney Bridge, to the south of Olney, which represents a focus of evidence of historic river crossings stretching back into prehistory and providing evidence of the origins of Olney as a market town on a crossing of the Great Ouse and possibly a minor inland port. There are no designated landscape areas within proximity to Olney, or historic parks or gardens within the parish area.
- 4.6.4 The Milton Keynes Landscape Character Assessment³⁶ presents evidence on the character of non-designated landscapes in proximity to Olney, including the Ouse Rural River Valley and Ouse Undulating Clay Farmland character areas. The River Valley area runs to the south and east of the town, and is defined by the sinuous valley floor of the River Great Ouse, which supports sheep and cattle on irregular sized open fields divided by drainage ditches, wire fences and hedgerow. This landscape area contains a number of floodplain meadows along the river course, with a small number of crossing points at Olney, Tyringham and Turvey. The Ouse Undulating Clay Farmland character area covers the majority of Olney and extends to the north and west of the town. It comprises an extensive undulating arable landscape with a mixed field pattern of enclosed fields ad limited woodland cover.
- 4.6.5 It should be noted that not all of the area's historic environment or landscape resource is subject to statutory designations, and non-designated features comprise a large part of what people have contact with as part of daily life whether at home, work or leisure. For example, although not listed, many buildings and areas are of historic interest, and are seen

³⁵ Historic England (2016) Roman Site at Olney Profile [online] Available at: https://historicengland.org.uk/advice/heritage-at-risk/search-register/list-entry/1351353 Accessed 06/12/2016

³⁶ Milton Keynes Council (2016) Landscape Character Assessment [online] Available at: https://www.milton-keynes.gov.uk/planning-and-building/planning-policy/landscape-character-assessment Accessed 07/12/2016

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as important by local communities. There are no registered parks or gardens within the parish area, however, there are likely to be parks and wider historic landscape assets which are important to the residents of the parish. Undesignated actual or potential archaeological finds in the area are also of significance. The Milton Keynes Council Historic Environment Record (HER)³⁷ forms a central collection of non-designated heritage assets that must be regarded in assessing Plan options and their potential impact on the historic environment.

The likely evolution thereof should the plan or programme not be implemented

4.6.6 Areas earmarked for development in the Plan area have the potential to impact on the fabric and setting of cultural heritage assets through inappropriate design and layout. Traffic growth also has the potential to lead to effects on historic environment across the Plan area. A particular area of sensitivity to increased traffic flows is Olney town centre. Existing historic environment designations and Local Plan policies will offer a degree of protection to cultural heritage assets and their settings. New development could also lead to incremental changes in landscape character and quality stemming from the loss of landscape features and visual impact. Olney is likely to be susceptible to this due to its historic village core and innate landscape value.

4.7 Land, Soil and Water Resources

The current state of the environment

- 4.7.1 Soil quality has a strong influence on the quality of agricultural land, which is split into five grades ranging from Grades 1-3a (best and most versatile) to Grades 3b-5 which are of poorer quality. Olney Parish is defined as predominately Grade 3 with a concentration of Grade 2 land to the north towards Warrington. Further assessment would be required to be able to ascertain whether the Grade 3 land was 3a (BMV) or 3b land. In this context land classified as BMV is protected strongly through the application of planning policy in order to retain the highest yielding agricultural land for agricultural purposes.
- 4.7.2 The percentage of household waste being recycled has increased from 52% in 2010/11 to 53.5% in 2012/13. However, this proportion has fallen slightly since 2011/12 when the percentage of waste being recycled was 53.8. Despite this, the Council's recycling rate is

³⁷ Information on the HER database can be accessed at: https://www.milton-keynes.gov.uk/planning-and-building/conservation-and-archaeology/historic-environment-record

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somewhat higher than the national average of 42%³⁸. There are three Community Recycling Centres in Milton Keynes Borough, the closest of which is at Newport Pagnell, on North Crawley Road.

4.7.3 There are no areas within the Plan area that are susceptible to groundwater pollution, however the entire Plan area is designated as a groundwater and surface water nitrate vulnerable zone. This is because the groundwater is considered to have high nitrate concentrations (over 50 mg/l nitrate).

The likely evolution thereof should the plan or programme not be implemented

4.7.4 In the absence of the Plan, unplanned development on greenfield land is more likely to occur. This is especially the case given the availability of such land in the Plan area and the likely growth in the local population and economy which will make development attractive in turn. Development of sites in the Plan area also has the potential to lead to the loss of BMV agricultural land, particularly Grade 2 land northwards, but despite uncertainty over whether the Grade 3 land comprises 3a or 3b land. Increasing pressures to improve recycling and composting rates in Milton Keynes will likely result in reductions in waste. This is reinforced by increasing legislative and regulatory requirements. The Plan is unlikely to pose any risk to nitrate vulnerability as it is unlikely to govern agricultural activities, and so this designation is unlikely to be relevant.

4.8 Population and Community

The current state of the environment

4.8.1 The 2011 census measured the total population of the Plan area as 6,447³⁹, which has increased by 415 (or 6.9%) since 2001. This rate of population change is somewhat slower

³⁸ Milton Keynes Council (2013) Zero Waste Management Strategy Refresh [online] Available at: https://www.milton-keynes.gov.uk/waste-recycling Accessed on 07/12/2016

³⁹ ONS (2011) Census, 2011, Population Density, 2001 (QS102EW) [online] Available at: <a href="http://www.neighbourhood.statistics.gov.uk/dissemination/LeadTableView.do?a=7&b=11127255&c=olney&d=16&e=61&g=6399500&i=1001x1003x1032x1004&m=0&r=1&s=1478257594262&enc=1&ds=147825

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than the Borough average of 20.2% over the same period. Statistics compiled by the ONS⁴⁰ in regards to the age profile of Olney Parish shows that the Plan area has a significantly higher proportion of older people (aged over 59) (24.8%) than the Borough (19.3%), region (23.4%) and national (22.3%) averages. The Parish also has a lower percentage of the population within the under 25 age group, with 27.7% of the population aged 0-24. This is lower than the Borough (32.6%), the south east (30.2%) and England (30.8%). Olney's deprivation levels are significantly lower than average, with 59.1% of households not deprived in any dimension, compared to the national average of 42.5%.

4.8.2 Whilst there are no figures at ward or parish level for housing-related data, data from DCLG⁴¹ indicates that the mean selling price of property in the Borough in 2014 was £210,840, somewhat lower than the 2012 nation-wide mean of £246,764 and lower than the South East average of £299,240. The affordability ratio in Milton Keynes, the relationship between the average income in the area to average house price in the area, in 2015 is 7.98. This is an increase from 6.60 in 2013 and is higher than the national average of 7.63 and means that homes are less affordable in the area than the national average.

The likely evolution thereof should the plan or programme not be implemented

4.8.3 The housing delivery strategy for the Plan area is set out in the Milton Keynes Core Strategy, but no allocations have yet been made. The Strategy outlines policies for the type and tenure of new housing to be delivered, together with the saved policies of the Local Plan. It is expected that 300 dwellings will be delivered in the Plan area to 2031. In the absence of the ONP the suitability and affordability of this housing may be less appropriate for local

⁴⁰ ONS (2011) Age by Single Year 2011 (QS103EW) [online] Available at: http://www.neighbourhood.statistics.gov.uk/dissemination/LeadTableView.do?a=7&b=11127255&c=olney&d=16&e=61&g=6399500&i=1001x1003x1032x1004&m=0&r=1&s=1478257594262&enc=1&ds=14782575942&enc=1&ds=1478257594262&enc=1&ds=14782575

⁴¹ DCLG (2013) Live tables on housing market and house prices, Table 581 Housing Market: mean house prices based on Land Registry data, by district, from 1996 (quarterly), [online] available at: https://www.gov.uk/government/statistical-data-sets/live-tables-on-housing-market-and-house-prices Accessed 07/12/2016

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requirements. Also, unplanned, fragmented development may have implications in terms of transport and access to services or the natural environment.

4.9 Transport

The current state of the environment

- 4.9.1 The proportion of car ownership is higher in the Parish than the Borough, regional and national averages, with only 365 households (13.5%) without a car or van. The proportion of households with only 1 car in Olney Parish is relatively low (37.5%) compared to 43.2% at the Borough level 41.7% in the South East and 42.2% in England. This is relatively low when compared to the proportion of households with 2 or more cars in Olney Parish (37.8%) against the other averages (29.8% in Milton Keynes, 29.8% in the South East and 24.7% nationally). The proportion of homes with 3+ cars also is relatively high in Olney. High car ownership reflects the relative affluence of the Plan area and its suburban nature.
- 4.9.2 The proportion of people travelling to work by driving a car or van is higher than Borough averages, and significantly higher than regional and national averages. Conversely, a much higher proportion of residents in Olney Parish work from home. The proportion of residents travelling to work by sustainable forms of transport (bicycle or public transport) are consistently lower than Borough, regional and national averages. However, walking to and from work is more common, proportionally, for Olney Parish residents as opposed to other areas.

The likely evolution thereof should the plan or programme not be implemented

4.9.3 An increase in population and housing growth may lead to increased traffic in the Plan area, although this has the potential to be mitigated by measures outlined in the Core Strategy and Local Transport Plan. Population growth could support the viability of bus services, but this is somewhat dependent on investment in bus transport and a modal shift away from private car use.

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5.0 The Key Issues and Objectives

5.0 Introduction

5.0.1 In line with the Regulations, the Environmental Report must include the key problems, issues and objectives that should be a focus of, or provide a framework for, appraisal. Drawing on the review of the sustainability context and baseline, the SEA Scoping Report identified a range of sustainability problems and issues that frame the focus of the appraisal. This will ensure it is a robust and focused assessment. These issues have since been translated into sustainability objectives, which provide a methodological framework for the appraisal of likely significant effects on the baseline. This includes feedback from the consultation bodies in order to establish the scope of the SEA.

Sustainability Topics and Objectives

SEA topic	SEA objective(s)
Air Quality	 Seek opportunities to reduce, where possible, air quality issues within Olney.
Biodiversity	 Protect, and where possible, enhance designated biodiversity features and other features of biodiversity value.
Climate Change	 Mitigate the impacts of climate change in Olney; and Support the resilience of Olney to the potential effects of climate change.
Economy and Enterprise	 Protect existing industries and businesses in Olney; and Seek to promote sustainable employment opportunities in Olney.
Health and Wellbeing	Promote the health and well-being of Olney's residents.
Historic Environment and Landscape	 Protect, maintain and enhance Olney's cultural heritage resources, including its historic environment and archaeological assets; and Protect and enhance the character and quality of landscapes and townscapes.
Land, Soil and Water Resources	 Ensure the more efficient use of land and the use of suitably located previously developed land and buildings;



	 Protect, and where possible enhance, groundwater and surface water bodies; and Protect, and where possible enhance, BMV agricultural land.
Population and Community	 Provide a range of housing types appropriate for the local community including; affordable housing and starter homes, specialist housing for older persons, and a mix of dwelling sizes, types and tenures.
Transport	Promote sustainable transport use and reduce the need to travel.

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6.0 What has Plan-making and SEA involved up to this point?

6.0 Introduction

6.0.1 This section of the report outlines the reasons for selecting the alternatives dealt with and the likely significant effects on the environment associated with alternatives and an outline of the reasons for selecting the preferred approach in-light of alternatives appraisal. This will include a description of how environmental objectives and considerations are reflected in the draft Plan. In doing so, this section tells the 'story' of Plan-making up to this point. Specifically, this part of the report explains how the preparation of the draft Plan has been informed by an appraisal of two approaches to spatial strategy (i.e. different combinations of sites for allocation). Naturally, given that the key Plan objective relates to site allocations, then it follows that developing and appraising alternative approaches to site allocation should be the focus of the appraisal.

6.1 Developing the Olney Neighbourhood Plan

- 6.1.1 Plan-making for the ONP began in November 2013 when Olney Town Council applied to Milton Keynes Council to designate an Olney Neighbourhood Plan Area, to cover the entirety of Olney Parish. The Neighbourhood Plan was approved for designation in March 2014. Following this, extensive consultation exercises were carried out by the Steering Group including a questionnaire which sought comment from the community about what should be the focus of the Plan.
- 6.1.2 Following these preliminary consultation exercises, over 600 responses were received from the community, which were condensed into the vision and core objectives to be achieved by the Plan. These were then augmented with policy approaches before additional consultation was completed on the Plan, specifically a Draft Site Allocation Plan for the community to consider which sites should be considered for housing and employment, utilising a site prioritisation approach.

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7.0 Appraisal of Reasonable Alternatives for the Plan

7.0 Identifying Reasonable Alternatives

- 7.0.1 A central component of producing the Plan has been developing a range of options for growth and appraising these, so that a preferred option could be selected. Whilst the Plan is not solely about housing allocations, the allocation of land for 300 new dwellings forms the central part of the Plan and hence is the focus of the options. To develop and assess alternative approaches to spatial strategy, understanding the 'technical' (i.e. physical and environmental constraints) spatial issues of the town has been necessary. Feedback from consultation on strategic allocations has also informed this approach, as well as the key technical spatial issues which affect where development may be suitably located. These are:
 - Heritage setting the majority of Olney town centre is covered by a Conservation Area, and
 also features a number of listed buildings. There are also two Scheduled Monuments
 surrounding Olney. The Scheduled Monument to the north of the town is a significant
 constraint to developing land to the north east of Olney. Any development that affects the
 setting of either of these assets must preserve and enhance them.
 - Flood Zone Land to the south and east of the town comprises Flood Zone 2 and Flood Zone 3 land. No residential development can take place within this area.
 - Landscape and topography Land to the west, south and east of Olney comprises an Area of Attractive Landscape, being of county wide landscape value. Further to the west, the topography of the land rises significantly, forming a ridge. Any development in these locations should not damage the special character of the area or its landscape features.
 - Sewage treatment works Proximity of any new residential development to the sewage treatment works would potentially affect residential amenity. It is considered that commercial uses may be more acceptable at this location.
 - Settlement boundary The settlement boundary of Olney is drawn tightly around its urban edge and so new development on sites to the north of Olney beyond the existing employment areas that have a physical separation from the town are unlikely to be appropriate when considering its rural setting.
- 7.0.2 The group completed extensive consultation with the community to understand where development should be delivered. Following this the group assessed the outcomes of that consultation process through technical assessment of the potentially suitable sites to establish broad options for the growth of Olney. In summary, land to the south and east of Olney is heavily constrained by risk of flooding, whilst land to the south west, south and east of Olney is of relatively high value in landscape terms. Land to the south west of Olney forms a ridge

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line and is an obvious edge to the town as a result of its topography. Land to the north east of Olney, along Warrington Road, is relatively constrained by the location, proximity and operation of the sewage treatment works that would impact detrimentally on residential amenity. Sites in this location are also physically separated from the town itself by the established industrial estate and business park with little, if any, pedestrian connections to the footpath network.

- 7.0.3 As a result, two broad options for the growth of Olney were established to appraise as reasonable alternatives through the SEA process. These are described below:
 - Option 1: Delivery of the housing allocation for the Plan area through sites to the north west and north east of the settlement boundary (Sites A, D and E); and
 - Option 2: Delivery of the housing allocation for the Plan area through sites to the west of the settlement boundary (Sites E, F and G).
- 7.0.4 The options have been appraised as 'reasonable alternatives' against the baseline and relatively. These have been considered through the SEA Framework of objectives and appraisal questions developed during scoping.

7.1 Summary of Reasonable Alternatives Appraisal

- 7.1.1 Appendix A presents the detailed assessment of the appraisal of reasonable alternatives as outlined above. The findings are presented trough the 9 sustainability topics discussed in Section 5. To support the appraisal findings, the two options have been ranked in terms of their sustainability performance against the relevant topic. The scoring system adopted is qualitative in nature and as such placing too much significance on the number of positive scores should be avoided. Instead, the appraisal is used as a tool to identify areas for improvements rather than a quantitative evaluation. The use of totalling the score for each Option was done in order to compare the options in a simple way to total the number of positive scores.
- 7.1.2 Options 1 and 2 would likely both result in additional car journeys made by new residents, leading to increases in traffic flows along some routes, with associated impacts on air quality. Option 1 presents a more dispersed approach to housing delivery and so would limit concentrated inputs to air pollution, but would likely result in a greater number of vehicle trips. However, the lifestyle of Olney residents and their propensity for private car use would



- likely result in increased congestion along Weston Road should Option 2 be delivered. Both options would be equally like to be able to deliver the housing numbers set out for the area.
- 7.1.3 Options 1 and 2 wold both support health and wellbeing for Olney residents. That being said, the delivery of housing growth across a greater number of sites, would likely distribute the effects of noise and air quality from traffic flows and not concentrate them in high risk areas. Both sites present opportunities for access to open space and sport/leisure facilities.
- 7.1.4 Option 1 performs well in terms of socio-economic considerations given that it could support the existing centre and support the growth of the town centre northwards, as well as supporting potential new opportunities for retail. Option 1, through promoting smaller sites across a greater number of locations, distributes the allocations across the town and promotes compact housing development sites which sit effectively within the historic setting of Olney. Option 2 land parcels are elevated above the town by natural topography, and so would likely have a more negative impact on the landscape and townscape character of Olney.
- 7.1.5 Option 2 performs better on transport considerations, as it would deliver an increased level of housing taking place closer to Olney town centre. This would result in easier access to services and facilities through sustainable methods of transport. Figure 2 below presents a summary of the rankings of the two options in relation to the 9 sustainability topics.

Sustainability topic	Option 1	Option 2
Air Quality	2	2
Biodiversity	2	2
Climate Change (including flood risk)	1	2
Economy and Enterprise	1	2
Health and Wellbeing	1	2
Historic Environment and Landscape	1	2
Land, Soil and Water Resources	2	2
Population and Community	2	2

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Transport	2	1

Figure 2: Rankings of each option by sustainability topic

7.2 Selecting the Preferred Spatial Strategy

- 7.2.1 This section presents an overview of the rationale for selecting the preferred approach in light of the findings of the appraisal of reasonable alternatives. Building on the appraisal findings outlined above, the ONP Steering Group viewed a number of clear advantages in selecting Option 1 above. In particular, the Steering Group considered that this approach would have the following benefits:
 - Option 1 would be more sympathetic with Olney's existing built environment and spatial strategy;
 - Option 1 would deliver dispersed development across the town to support the existing community;
 - Option 1 would disperse development across the town to dilute pressure on key junctions during peak hours;
 - Option 1 would result in less significant visual impact owing to its topography to protect the character, appearance and significance of the historic town centre and conservation area;
 - Option 1 would result in encouraging residents to contribute to the sense of neighbourhood in the town; and
 - Option 1 would support the economic growth of the town northwards of the town which is underutilised.
- 7.2.2 This appraisal has established that the preferred option for development is Option 1, to deliver the housing allocations for the Plan area through sites to the north west and north east of the settlement boundary. However, the preferred approach is not only determined by the SEA process, but the options have also been subject to:
 - An appraisal against the vision and objectives developed in consultation with local people;
 - An appraisal of the site choices in consultation with local people;
 - An appraisal against planning policy (comprising the NPPF and policies of the Milton Keynes Council Local Plan);
 - Discussions with statutory consultees, stakeholders and interested parties; and

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• Discussions with representatives of local groups, schools, service providers and Town Councillors.

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8.0 Appraisal of the Draft Plan

8.0 Introduction

- 8.0.1 This section of the report must include:
 - The likely significant effects associated with the draft plan approach; and
 - The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan approach.
- 8.0.2 The purpose of this section is to highlight areas where there are opportunities to increase the sustainability of the Plan and make recommendations in relation maximising potential positive impact or highlighting areas where mitigation is needed against negative effects.
- 8.0.3 This section is structured under the 9 topic headings, under which a number of objectives are listed and questions posed which were developed during scoping. This provides the assessment framework for the appraisal of likely significant effects on the baseline position. Predicting effects accurately is inherently challenging given the high level nature of the Plan and the understanding of the baseline. As a result, identifying and evaluating significant effects requires exercising caution, ensuring assumptions are explained in full⁴². In some instances, predicting significant effects is not possible but rather it is possible to comment on the merits (or otherwise) in more general terms.
- 8.0.4 The effects are predicted having regard to the criteria presented in Schedule 2 of the SEA Regulations and so account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered where the effects of the Plan may combine with the effects of other planned or on-going activity that is outside of the control of the ONP (i.e. the proposed safeguarding of routes for the A509 bypass).

⁴² As stated by Government Guidance (The Plan Making Manual) [online] Available at: http://archive.pas.gov.uk/pas/core/page.do?pageId=109798 "Ultimately, the significance of an effect is a matter of judgement and should require no more than a clear and reasonable justification."

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8.1 Air Quality

Sustainability objective	Olney Neighbourhood Plan air quality decision making questions
Seek opportunities to reduce, where possible, air quality issues within Olney.	 Will the option help to: Avoid resulting in increased nitrogen dioxide in the Olney AQMA? Promote opportunities to reduce nitrogen dioxide levels in the Olney AQMA?

- 8.1.1 Existing air quality issues within Olney are closely linked to traffic and congestion along the A509 road which passes through the town. This has led to the declaration of an AQMA in central Olney along Bridge Street and High Street South where concentrations of nitrogen dioxide exceed annual mean objectives.
- 8.1.2 The preferred approach supports the allocation of 3 sites, none of which are located within 1km of the AQMA itself. The key consideration is the effect of the new sites on the air pollutants which led to the declaration of the AQMA. In this context the relatively dispersed nature of development has the potential to limit effects on air quality, although the cumulative effect of multiple developments could lead to some effects. Also, whilst the sites are not in proximity to the defined town centre of Olney, the sites are well served by bus stops and pedestrian footpaths which provide good access to the centre.
- 8.1.3 Air quality in Olney will be supported by Policy ONP15, which states that all existing open spaces will be protected from development. The policy also suggests designating areas currently used for sports, allotments and amenity for continued use for those purposes. Policy ONP3 and Policy ONP4 also require green infrastructure to be provided alongside the residential development.
- 8.1.4 An inevitable consequence of Olney's growth will be some localised impacts on traffic flows. However, the spatial strategy which favours a dispersed concentration of development (with good public transport access) will help mitigate impacts on air quality. This will be supported by the policy measures that will be adopted alongside Milton Keynes Council's policies on air quality and amenity.

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8.2 Biodiversity

Sustainability objective	Olney Neighbourhood Plan biodiversity decision making questions
Protect, and where possible, enhance designated biodiversity features and other features of biodiversity value.	 Will the option help to Protect and enhance the integrity of the designated habitats in the Parish? Protect and enhance locally valuable biodiversity habitats? Avoid negative impacts on the SSSIs in proximity to the Parish? Ensure the Plan will result in a biodiversity 'net gain' within the Parish?

- 8.2.1 New housing development in the town has the potential to lead to direct impacts on biodiversity through loss of habitats, the severance of biodiversity corridors and disturbance to species. There are a number of other indirect impacts that could impact on biodiversity such as through air or water pollution. It is likely that the preferred approach to development will help to ensure that effects on designated habitats are avoided. It is noted that housing allocations are situated within the impact zone of the Yardley Chase SSSI. However, the physical separation of the allocations from the SSSI itself means that the locations are unlikely to impact detrimentally on the habitat.
- 8.2.2 None of the preferred sites comprise Biodiversity Action Plan Priority Habitat, but one site (Site A, north east of Olney) is designated as a Wildlife Corridor. Development of this site should therefore seek to ensure that the biodiversity asset is protected. This could be achieved by maintaining a continuous and well-connected and multifunctional green space.
- 8.2.3 In terms of the Plan's supporting policies, whilst the protection and enhancement of biodiversity is not specifically promoted through the policies, the protection and enhancement of open spaces is supported through Policy ONP15. In this context all open spaces will be protected from development. Likewise, the policies relating to residential site allocations each



- require open space to be included within the site as part of a comprehensive masterplanning exercise, in order to enhance the green infrastructure network.
- 8.2.4 Biodiversity offsetting should be undertaken, if needed, to ensure a net gain in biodiversity, by assessing the preferred sites utilising DEFRA's biodiversity offsetting metric⁴³ and the environment bank biodiversity impact calculator⁴⁴ to account for impacts on biodiversity. This method quantifies the value of biodiversity at any site to form an evidence base on required mitigation to ensure a net gain to biodiversity.
- 8.2.5 The baseline value, in biodiversity units, of the sites which comprise the preferred approach is 84 units which would be lost through development. Therefore, in order for the Plan to achieve a net gain in biodiversity, an offsetting scheme is required for habitat creation and restoration projects to re-provide habitat in strategic local areas over the long term. This should upscale the quality and distinctiveness of the baseline value. The Plan is likely to achieve this through ensuring new housing development provides sufficient green infrastructure. This will support Olney's biodiversity resource and complement national policy and Core Strategy objectives and provisions relating to the protection and enhancement of biodiversity assets and networks.
- 8.2.6 Whilst significant negative effects are unlikely as a result of the draft Plan, the Plan has further potential to recognise the town's biodiversity assets. Similarly, there is further potential for the Plan to explicitly promote the protection and enhancement of key biodiversity features in the Plan area such as hedgerows, meadows and trees, and to seek to facilitate improved ecological connections in the Plan area.

https://www.gov.uk/government/collections/biodiversity-offsetting#guidance-for-offset-providers-developers-and-local-authorities-in-the-pilot-areas Note; the 'Guidance for developers' and 'Guidance for offset providers' documents provide a calculation method.



8.3 Climate Change

Sustainability objective	Olney Neighbourhood Plan climate change decision making questions
Mitigate the impacts of climate change in Olney; Support the resilience of Olney to the potential effects of climate change.	 Will the option help to Minimise greenhouse gas emissions? Support reduced car dependency and increased walking, cycling and public transport use? Improve parish resilience to the estimated increase in frequency and severity of winter flooding, and summer time water shortages, through appropriate measures (i.e green infrastructure)? Mitigate the impacts of climate change on species by providing connected green space?

- 8.3.1 In terms of climate change mitigation, the Plan can contribute to limiting greenhouse gas emissions through locating development with a view to reducing car dependency and encouraging low carbon modes of travel. In this context, the sites are all in proximity to a bus stop with hourly services during the day and are within walking distance of a healthcare facility and school. Policy ONP16 states that new development will be planned with cycle and pedestrian routes that will integrate with existing networks. Through this approach, the Plan will reduce car dependency to limit the effect of new development on traffic flows and greenhouse gas emissions.
- 8.3.2 The Plan seeks to promote climate change mitigation through Policy ONP8 in regard to housing type and design. Developers are encouraged to build dwellings to ensure a high energy efficiency rating. The Core Strategy policies provide guidance relating to the delivery of low carbon energy infrastructure.
- 8.3.3 Climate change adaptation will be supported by the draft Plan approach. The Plan has made provisions in each of the policies for residential allocations to ensure that all new development is accompanied by sufficient drainage systems and new and improved open space provision. The Plan could go further in identifying and creating connected habitats to help wildlife adapt to the impact of climate change so that are able to move to areas where they can survive. The Plan also seeks to protect existing open spaces within the Plan area

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from development. These actions will support the management of surface water run-off and a limitation of other potential impacts of climate change locally, such as extreme temperatures and weather events. The preferred approach steers residential development away from areas at high risk of flooding to the east and south of Olney.

8.4 Economy and Enterprise

Sustainability objective	Olney Neighbourhood Plan economy and enterprise decision making questions
Protect existing industries and businesses in Olney; and Seek to promote sustainable employment opportunities in Olney.	 Will the option help to Support development in the existing centre and ensure the health of the centre? Encourage the retention and growth of existing locally based industries and businesses? Accommodate new and expanding businesses? Encourage new investment in the local economy and promote development opportunities for employment?

- 8.4.1 The central focus of the ONP is housing allocations rather than the provision of employment land. However, the Plan does propose to safeguard existing employment land through Policy ONP12 and allocate additional land for a combination of employment uses through Policy ONP13. As such, it is considered the Plan will provide sufficient land for employment needs over the Plan-period. This will encourage the retention and growth of existing, and new, locally based industries and businesses and support economic growth in Olney.
- 8.4.2 The residential sites promoted by the draft Plan also support the economic vitality of the Plan area. The Plan's aim for residential development to the north of the centre will help direct appropriate retail, leisure and employment opportunities to Olney through regeneration. This will support the vitality and viability of the town centre and support opportunities for services and amenities to the north of the town. As such, the Plan identifies a potential site for retail uses to support the new community.
- 8.4.3 In terms of accessibility to employment opportunities in the town, all of the proposed housing sites are in close proximity to the existing designated employment area. This will support accessibility to economic opportunities in the town. Accessibility to employment (including the

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- town centre) will also be supported by the Plan's general focus on accessibility and supporting public transport enhancements.
- 8.4.4 The Plan's approach to conserving the quality of Olney's built, cultural heritage and historic environment resource could support the visitor economy of the town. Open space enhancements promoted by the draft Plan will further support the visitor economy.

8.5 Health and Wellbeing

Sustainability objective	Olney Neighbourhood Plan health and wellbeing decision making questions
Promote the health and well-being of Olney's residents	 Will the option help to Promote accessibility to health and community facilities, particularly for older age groups? Provide and enhance the provision of community access to active recreation opportunities?

- 8.5.1 In terms of accessibility to health facilities, each of the sites are within 1km of a healthcare facility. All of the proposed sites are accessible to and from Olney centre via established footpaths. Bus services connect the sites to Olney town centre to support access to these services, particularly for elderly residents. Policy ONP10 supports proposals for health, social care and community uses to help improve opportunities to promote health and wellbeing.
- 8.5.2 The sites are not readily accessible to cycle routes in the town. This reflects existing deficits relating to high quality cycle routes in the town and not suggestive of the unsuitability of site locations. In order to address this, the draft Plan's policies promote new and improved cycling routes to accompany new housing development. This will promote sustainable modes of travel to support health and wellbeing.
- 8.5.3 The draft ONP has a close focus on protecting and enhancing greenspace in the Plan area. This includes through ONP15 which states that all existing open spaces will be protected from development and offering support to new development that provide for additional open space. Likewise, the housing policies seek to ensure that new housing areas will be supplemented by green infrastructure networks. This will help enhance community access to active recreation opportunities. The Plan's impetus on open space enhancements will

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therefore support the health and wellbeing of residents by facilitating improvements in levels of physical activity, enhancing the social interaction of residents and promoting psychological health and mental well-being. Policy ONP18, on developer contributions, outlines the local priorities for contributions which include health and social care, open space and public amenities and community assets. These contributions are likely to improve Olney residents' health and wellbeing.

8.6 Historic Environment and Landscape

Sustainability objective	Olney Neighbourhood Plan historic environment and landscape decision making questions
Protect, maintain and enhance Olney's cultural heritage resources, including its historic environment and archaeological assets.	Will the option help toPreserve and enhance the setting and integrity of heritage assets?
Protect and enhance the character and quality of landscapes and townscapes.	 Support access to the historic environment? Protect and enhance townscape features and archaeological assets? Protect and enhance the local landscape?

- 8.6.1 In regards to heritage assets, none of the three residential sites put forward by the draft Plan are located within the Olney Conservation Area or are in close proximity to listed buildings. Site A is located within roughly 100m of a Scheduled Monument. Given that none of the sites host assets of designated historic value, none would directly impact on the integrity of those assets. Indirect effects on the setting and integrity of the assets from these allocations depend on the design and layout of new development and how they sit within the historic context of the town. Mitigation through landscape planting and physical buffer zones could help to maintain these cultural resources. Development of the sites would ensure high quality pedestrian and cycle access to and from Olney. This could present opportunities to support access to the historic environment.
- 8.6.2 In this context potential effects on the historic environment can be limited by policies put forward by the draft Plan. Policy ONP3 specifically seeks to ensure that the development of Site A would not impact heritage assets or unknown archaeological deposits, recommending an Archaeological Assessment be prepared to confirm this position. The draft Plan also requires development proposals for the other two preferred sites (and employment

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proposals) to undertake appropriate assessments to ensure that new housing protects and enhances Olney's townscape and archaeological features. These policies promote development that is designed to relate to the character of the area and ensure that housing development is well designed in respect of landscape and open space. Proposals for infill, windfall and reserved housing sites must also respect the historic environment as stipulated in the draft Plan. As such, it is considered the draft Plan promotes a protectionist approach to Olney's historic environment, with benefits for promoting access to better reveal the significance of its assets.

- 8.6.3 In respect of landscape, new development has the potential to lead to incremental but small changes in landscape character and quality in Olney. This includes from the loss of landscape features and visual impact. All of the proposed residential sites are greenfield in nature, and so have the potential to increase the impact of the built footprint of Olney on the surrounding landscape. Olney is not in proximity to any AONB, but land to the west, south and east are considered Areas of Attractive Landscape. This includes one of the preferred sites to the north east of Olney. In light of this, the draft Plan seeks to address this issue through stating that development proposals should be brought forward through comprehensive masterplans supported by landscape and visual impact assessment. This could help deliver high quality development which ensures a visual context with the countryside and minimising impacts on views from the countryside.
- 8.6.4 The potential effects of the residential sites on landscape character and quality have the potential to be limited by other policies promoted by the draft Plan. Particularly, landscape quality will be promoted by the presumption in favour of protecting and enhancing green infrastructure and provision of new green space through Policy ONP15.

8.7 Land, Soil and Water Resources

Sustainability objective	Olney Neighbourhood Plan land, soil and water resources decision making questions
Ensure the more efficient use of land and the use of suitably located previously developed land and buildings. Protect, and where possible enhance,	 Will the option help to Promote the use of previously developed land where possible?
groundwater and surface water bodies Protect, and where possible enhance, BMV land (grade 1-3a).	 Minimize the risk to groundwater and surface water NVZs, and where possible avoid



development which has potential to negatively impact on these?
 Protect, and where possible enhance the quality of the River Ouse and other surface water bodies?
 Ensure the finite resource of BMV land (grade 1-3a) is avoided?

- 8.7.1 None of the proposed sites for residential development are located on previously developed land. This is attributed to the lack of brownfield sites available in Olney that were put forward by the ONP. The draft Plan does take account of potential opportunities to utilise previously developed land where possible, with Policy ONP6 supporting the redevelopment of infill sites. The Plan also promotes opportunities for using previously developed land through Policy ONP12 which seeks to safeguard existing employment sites.
- 8.7.2 In regards to agricultural land quality, the development of the preferred approach may lead to some loss of best and most versatile land as each of the preferred sites comprises Grade 3 agricultural land. However, this is not certain, given that it is not possible to distinguish whether the parcels are Grade 3a or 3b agricultural land without completing an agricultural land classification survey. The Plan could go further in this regard, requiring proposals to complete such a survey to establish potential impact on the finite resource.
- 8.7.3 Nitrate Vulnerable Zones (NVZ) are identified as areas where groundwater has high concentrations of nitrate, or are at risk of agricultural nitrate contamination. Whilst the entire Plan area is designated as an NVZ, the Plan does not govern agricultural activities and so the Plan will not have any impact or bearing on this designation.
- 8.7.4 Fluvial and surface water runoff flooding is a significant risk for the Plan area, owing to its proximity to the River Ouse. Flooding from surface water runoff may become an increasing issue due to an increased incidence of extreme weather events and an increase of the built footprint in Olney. That being said, the proposed sites are not sited in areas considered at risk of flooding. As well as the location of the residential sites, the Plan seeks to ensure that development is accompanied by drainage systems and new and improved open space

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provision. This will likely help to reduce flood risk from surface water run-off in the town. The Plan also seeks to retain the River Ouse floodplain to the east of the town.

8.8 Population and Community

Sustainability objective	Olney Neighbourhood Plan population and quality decision making questions
Provide a range of housing types appropriate for the local community including; affordable housing and starter homes, specialist housing for older persons, and a mix of dwelling sizes, types and tenures.	 Will the option help to Promote the provision of a range of high quality and affordable housing to meet local needs? Increase the net supply of housing, including affordable housing? Provide housing for people, particularly elderly residents and those on low to moderate incomes? Encourage development at an appropriate design, standard, size and mix?

- 8.8.1 The draft Plan identifies sites with sufficient capacity for 300 dwellings, which meets the full apportionment required by the Core Strategy. It is assumed that this growth quantum is appropriate to meet housing need based on objectively assessed housing needs arising locally. Therefore, it is considered that the housing allocations promoted by the Plan will help meet established housing need in the Olney area.
- 8.8.2 The draft Plan indicates the type and design of housing that is sought to be delivered by the Plan under Policy ONP7 and Policy ONP8 in order to provide appropriately sized housing for a range of groups including young families and elderly people. The Plan also includes the provision of affordable housing under these policies, requiring a proportion of the new affordable housing stock to be marketed to local people under the Local Connection Policy. The draft Plan also focuses on ensuring new housing provision supports the character and historic context of Olney and is easily accessible to services and facilities and limits traffic

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growth. Achieving these aims will support wider considerations relating to the quality of housing provision in the Plan area.

8.9 Transport

Sustainability objective	Olney Neighbourhood Plan transport decision making questions
Promote sustainable transport use and reduce the need to travel.	Will the option help to Reduce the need to travel through sustainable patterns of land use and development?

- 8.9.1 The A509 road, which runs through Olney, is the main north-south road from Milton Keynes to Wellingborough. It is a heavily used route for HGVs and is heavily loaded at peak hours which has contributed to the AQMA designation within the town centre as outlined above. In this context, the location of the residential sites put forward by the draft Plan largely support accessibility to public transport. Each of the sites are in walking distance to a bus stop with hourly services to Olney and other nearby settlements including Milton Keynes. The sites are also in walking distance of the healthcare facilities in Olney via dedicated footpaths. Proposals for residential development are encouraged to provide good quality pedestrian access to link with the existing network by the draft Plan. There are no established cycle routes which link the preferred sites to the town which reflects existing deficits relating to cycle routes in the town.
- 8.9.2 The policies put forward by the draft Plan recognise the traffic and congestion issues in Olney and propose a number of policies to maximise sustainable transport opportunities through public transport, walking and cycling. New housing development is expected to facilitate new and improved walking and cycling routes in Olney to ensure that developers contribute to improving the town's public transport network. This will support a settlement structure that helps limit the need to travel and promotes walking and cycling in favour of private car use.
- 8.9.3 The draft Plan also recognises existing congestion issues on the road network through seeking to ensure that new development areas demonstrate that the traffic impact on the highway is acceptable. However, the policy does not state the types of mitigation measures that could be delivered. The draft Plan also seeks to alleviate pressures on the road network through Policy ONP17 which is restrictive of development that would prejudice the construction of the Olney bypass route. The draft Plan offers its support for the bypass to

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reduce transport issues within Olney which will help limit haulage traffic through the town centre.

8.10 Conclusions

- 8.10.1 The appraisal has concluded that the draft Plan is likely to lead to a number of significant positive effects. The positive effects are considered most significant in terms of health and wellbeing, transport, population and community and economy and enterprise. These benefits largely relate to the spatial approach adopted by the draft Plan to housing and employment growth in the Plan area.
- 8.10.2 The preferred approach presented by the draft Plan does not lead to any significant negative effects. The draft Plan approach will also help initiate a range of beneficial effects in relation to air quality, biodiversity, historic environment and landscape, climate change and land, soil and water resources. However, these are not considered as significant positive effects because the delivery of these allocations through the Plan will inevitably lead to some adverse effects in relation to these sustainability topics. For these topics, the draft Plan approach will limit the potential magnitude of adverse effects linked to the delivery of the housing allocations in the Plan area.
- 8.10.3 At this stage, a number of recommendations are made to mitigate the adverse effects of implementing the Plan. These are:
 - The draft Plan has a strong focus on enhancing open space provision in the Plan area, but there is potential for the Plan to set out how this could be delivered through a coordinated approach to green infrastructure planning. The delivery of new and improved green infrastructure provision would be more effective when planned for comprehensively, building on existing wildlife corridor resources. This would enable a coordinated approach which can seek to ensure the full range of benefits from a high quality green infrastructure network. For this reason it is recommended that the ONP provides further clarification as to how open space should be delivered in the town through a coordinated and joined up approach to green infrastructure.
 - In terms of air quality, there is further potential for the ONP to recognise the AQMA
 designation, and opportunities for the Plan to positively impact on nitrogen dioxide levels.
 Clearly, it is outside the ability of the Plan to deliver the proposed bypass but the Steering
 Group could suggest a new policy be introduced in the Plan to encourage supporting

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reductions in emissions to improve air quality through the planning application process. This would be done primarily through reducing car dependency and by providing alternatives to the car through provision of an increased network of footpaths and cyclepaths around the town. Other proposals such as de-trunking the A509 could also be explored to reduce HGV traffic through the town.

- There is further potential to refine Policy ONP16 to seek alternatives to increasing parking provision in the town centre to foster a modal shift away from private car use.
- The draft Plan could better recognise existing heritage assets across the Plan area, rather
 than focusing too narrowly on the impact of the proposed sites on those assets. An Olneywide policy on heritage and its conservation could be considered, in compliance with Milton
 Keynes Council objectives.

8.11 Next Steps

- 8.11.1 The Submission Draft Olney Neighbourhood Plan, as well as this Environmental Report, will be submitted to Milton Keynes Council for its consideration under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012. Milton Keynes Council will consider whether the Plan is suitable to go forward to Independent Examination in terms of the ONP meeting legal requirements and its compatibility with the Local Plan. Subject to their agreement, the Plan will then be subject to examination, whereby the Examiner will consider whether the Plan is appropriate having regard to national policy and whether it is in general conformity with the Local Plan.
- 8.11.2 The Examiner will be able to recommend that the ONP is put forward for referendum, or that it should be modified. The Council will then decide what should be done in light of the Examiner's report and invite the ONP Steering Group to make those necessary changes, which will be reflected in an updated Environmental Report.
- 8.11.3 Once adopted, the ONP will become part of the Development Plan for the area. At the time of adoption, an SA Statement will be published that will outline ongoing monitoring measures.

December 2016



Appendix A – Appraisal of Spatial Alternatives

Introduction

The Steering Group has identified two alternative options to spatial strategy, in effect, proposing two combinations of sites that have the potential to deliver 300 new homes over the lifetime of the Plan.

Methodology

For each of the options, the appraisal identifies and evaluates the 'likely significant effects' on the baseline, drawing on the sustainability topics and objectives identified through scoping as a methodological framework. This incorporates feedback from consultation bodies whereby the scope needed to be widened to take account of additional factors. These are considered against the SEA framework of objectives and decision making questions.

Effects are predicted taking account the criteria presented within Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations (2004), particularly the duration, frequency and reversibility of effects as far as possible. The characteristics of the effects are described within the appraisal, including the potential for cumulative effects.

This appraisal seeks to predict effects accurately, however this is challenging given the high level nature of the Plan and the limited understanding of the baseline and how this may change under a 'no plan' scenario. As such, it is considered necessary to make considerable assumptions regarding how the Plan will be implemented and what the effect will be on particular receptors. In some instances, it is not possible to predict likely significant effects with certainty, but in those cases it is possible to comment on the merits of an option in more general terms. This enables a distinction between the alternatives where it is not possible to distinguish between them in terms of the likelihood of 'significant effects'.



	Discussion of significant effects in regards to both options	Rank of preference	
Sustainability topic		Option 1 (Sites A, D & E)	Option 2 (Sites E, F & G)
Air Quality	The delivery of both Option 1 and Option 2 would likely result in additional car journeys made by new residents. This has the potential to lead to an increase in traffic flows along some routes, with associated impacts on air quality. The more dispersed approach to housing provision promoted by Option 1 would go some way to limiting concentrated inputs to air pollution, particularly within the Olney AQMA, but would likely result in a greater number of vehicle trips to and through the town centre. The allocations presented by Option 2 would be more likely to reduce the need to travel within Olney and would promote walking and cycling. That being said, given the propensity for private car use locally, this could lead to concentrated increases in traffic flows along Weston Road, with additional implications for air quality within the AQMA which extends from the junction between Weston Road and the High Street.	2	2
Biodiversity	All sites have the potential to have significant impacts on biodiversity if located inappropriately and poorly designed. Likewise, all sites have the potential to promote net gains in biodiversity value. In this context, for both options, potential effects on biodiversity depend on aspects such as the provision of green infrastructure to accompany new development areas and the retention and incorporation of biodiversity features. Option 1 promotes delivering housing allocations on a smaller scale but, but this could lead to incremental effects on biodiversity. Option 2, through delivering housing allocations on fewer, but larger sites has the potential to lead to an increased magnitude of localised effects on individual biodiversity assets.	2	2



Climate Change	In terms of greenhouse gas emissions, road transport is the single largest contributor to emissions within Olney Parish. In this context, promoting development of sites at locations in proximity to services and facilities has the potential to support climate change mitigation through facilitating a reduced level of car dependency. Sites making up Option 2 are physically closer to Olney town centre than Option 1 so this would promote walking and cycling to a greater effect. Option 1 would promote housing provision in a greater number of sites across the town, distributing the impact of development across Olney. In terms of climate change adaptation, enhancements to the town's green infrastructure networks will be a key means of helping Olney Parish adapt to the effects of climate change. The direct provision of green infrastructure improvements to accompany new development with Option 1 provides a tangible benefit. Neither Option 1 nor Option 2 presents significant risk of flooding as neither site is Flood Zone land. That being said, development of both options increase the risk of surface water runoff and flooding by increasing impermeable surfaces. This in turn reduces infiltration rates and subterranean storage potential.	1	2
Economy and Enterprise	Option 1 and Option 2 will both lead to an increased level in housing provision surrounding the town centre in order to support the vibrancy and vitality of existing employment uses. This could lead to supporting new opportunities for entrepreneurs to open local stores and amenities. Both sites are on the periphery of the town centre, which will do less to support the vitality of the town centre. Option 1 could result in the growth of the town centre further northwards along the High Street to support the resident population. This would be supported by the potential supermarket on Lavendon Road.	1	2
Health and Wellbeing	The delivery of housing provision through a greater number of sites, presented by Option 1, has the potential to distribute the effects of noise and air quality from traffic flows rather than concentrate them in high risk areas. Option 2 would result in a smaller number of larger sites with the potential to concentrate negative effects from noise and air quality in Olney. Options 1 and 2 offer good quality	1	2



	opportunities for sport and recreation. Each site is located in proximity to open space and sport/leisure facilities which are walkable.		
Historic Environment and Landscape	New development in the Plan area has the potential to impact on the fabric and setting of cultural heritage assets. Both Option 1 and Option 2 have the potential to enhance the setting of these assets in order to better reveal their significance. Neither collection of sites would result in the development of land with known archaeological potential. Option 1 promotes more compact housing development sites and so is more likely to facilities housing provision which more effectively sits within the historic setting of the town. The parcels of land which comprise Option 2 are elevated above the town by natural topography. Should Option 2 come forward, the visual impact of the development would impact negatively on the landscape and townscape character and quality of Olney.	1	2
Land, Soil and Water Resources	Both Option 1 and Option 2 would result in the development of greenfield land taking place. This is linked to the lack of brownfield sites to deliver sufficient homes in Olney within a tightly drawn settlement boundary. The agricultural land quality of sites for both options are Grade 3. Site specific soil surveys would be required to establish which sites comprised BMV land. Based on this, it is not possible compare each option on this factor. The entire Plan area is designated as a groundwater and surface water nitrate vulnerable zone. However, the Plan does not govern agricultural activities, and so these designations are not relevant.	2	2
Population and Community	Both options will deliver the housing requirement apportioned to Olney by Milton Keynes Council Core Strategy. In terms of affordable housing, all sites presented in both options would be expected to contribute via on-site delivery or off-site contributions via S106 agreement.	2	2
Transport	Option 2 has the potential to lead to an increased level of housing provision taking place closer to Olney town centre to allow easier access to services and facilities through sustainable methods of transport. Option 1 sites, whilst being further from the town centre, benefits from existing footpath network and bus services. These could be improved by new sustainable infrastructure to support the new housing development, including improvements to pedestrian and cycle links.	2	1