

THE SUSTAINABILITY APPRAISAL

1. THE STRATEGIC ENVIRONMENTAL ASSESSMENT

Under the SEA Directive 2001/42/EC, EU law requires plans or programmes which are likely to have significant (positive or negative) environmental effects to undergo a Strategic Environmental Assessment. However, the Newport Pagnell Neighbourhood Plan has been screened by the planning authority for a requirement for a Strategic Environmental Assessment, as it has been found that this is not a requirement for this Neighbourhood Plan.

2. BACKGROUND TO THE SUSTAINABILITY APPRAISAL

The Brundtland Report by the World Commission on Environment and Development defined Sustainable Development as: “Development which meets the needs of the present without compromising the ability of future generations to meet their own needs.”

More recently, paragraph 7 of the National Planning Policy Framework (2012) identifies the three dimensions to sustainable development and recognises the need for the planning system to perform a number of roles:

Social – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being;

Environmental – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

Economic – contributing to building a strong, responsive and competitive 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;

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Whilst it has been determined that a Strategic Environmental Assessment (SEA) is not required, a Sustainability Appraisal has been undertaken, which considers the extent to which the principles of sustainable development have been taken into account throughout the preparation of the Neighbourhood Plan. This was undertaken in recognition of the scale of the development, and the choices of two growth scenarios. The Sustainability Assessment has been an important tool in demonstrating that the plan contributes to achieving sustainable development – a basic requirement of Neighbourhood Plans.

3. THE SUSTAINABILITY APPRAISAL PROCESS

3.1. STAGES OF THE SUSTAINABILITY PROCESS

There are five stages to the Sustainability Appraisal process:

Stage A sets the context, objectives, baseline and scope for the Sustainability Appraisal. This stage sets out how planning policies will be appraised.

Stage B develops and refines plan options. The SA commentary highlights which option is most sustainable and how it can be improved

Stage C appraises the social, economic and environmental effects of the plan

Stage D develops the sustainability findings and consults on the plan.

Stage E monitors the implementation of the plan, to make sure policies are sustainable and to check there are no negative impacts. This will be undertaken by the Town Council during the review periods built into the plan.

The above stages were undertaken during the writing of the Neighbourhood Plan, as an integral part of the Plan, and should not be seen as distinctly different operations from the Plan itself. As the scope for the Neighbourhood Plan was considered, and the evidence base collected, sustainability concerns and issues were unveiled. In undertaking Site Analysis, which helped to determine the options for housing development, sustainability was a key factor in deciding on appropriate site location. The social, economic and environmental effects of various growth options were considered in deciding on the option most suitable. Collectively the findings of the sustainability appraisal confirmed the growth option choice. Consultation on sustainability of the Plan occurs simultaneously with Pre Submission Consultation, as the Sustainability Appraisal is one of the documents available to view and make comment on.

4. STAGE A – THE SCOPE OF THE SUSTAINABILITY APPRAISAL.

4.1 CONTEXT

Milton Keynes Council Core Strategy, adopted in 2013, set out the need for 1760 new dwellings in the rural area of Milton Keynes between 2010 and 2026. Newport Pagnell is the largest of three key settlements in the rural area, with a good level of existing infrastructure, and close proximity to central Milton Keynes. The Milton Keynes Local Plan, adopted in 2005, had identified a strategic reserve site in Newport Pagnell for housing development after 2011. Because it was obvious that significant development would take place in the town, Newport Pagnell Town Council decided that it was important that residents had a voice in relation to how, where and what development would take place.

On 5th March 2013, having undertaken an extensive visioning exercise, the Town Council agreed on the following pillars of change to meet the vision:

- Keeping and enhancing the vibrancy of the Town Centre
- Encouraging more and better events
- Creating further off-street parking
- Developing the Town's Heritage offerings
- Expanding leisure and sporting facilities in the town.

These pillars would play an important part in the development of the Neighbourhood Plan.

Whilst it was clear that development would take place in Newport Pagnell, there were 11 different sites (increased to 12 after Milton Keynes Council consulted on their new Site Allocation Plan) to consider, as well as options in relation to how much development should take place. Principal issues raised by residents during the Options and Issues Consultation were

- concerns about school places,
- inability to get appointments with General Practitioners
- a requirement to protect Bury Common
- protection and enhancement of other open spaces.
- retention of the historical aspects of the town.
- enhancement the High Street to encourage more shopping locally, and provide more opportunities both for parking and cycling to town.
- concerns about an increase in flooding brought about by new development.

The scope of the Sustainability Appraisal was therefore to take into account which were the most sustainable sites for development, the types of

development that should take place (employment or housing), how much new development should take place, and how this development could be made sustainable.

4.2 THE ENVIRONMENTAL BASELINE

An analysis of the differences between the 2001 census and the 2011 census and other evidence relating to the environmental baseline showed that: ¹

- There is an increasing proportion of over 65s in the town, but also of 0-4 year olds.
- There is a low proportion of affordable housing, through council or housing association stock.
- There is shortage of shared ownership properties.
- Schools in Newport Pagnell are able to cope with existing pupil numbers, but a large scale development will affect this. ²
- There is an adequate number of doctors per 1000 head of the population, but facilities are stretched.³
- There is a shortage of playing field space, and also NEAP provision on the east side of the town.
- There is a lot of existing open space provision but this is poorly supported with amenities.
- There is a shortage of car parking in the town centre, particularly long stay parking.⁴
- The cycle track network is not complete and does not encourage sustainable transport.⁵
- The town has extensive historical assets, which must be protected.⁶
- Agricultural land values varied on sites available for development. ⁷
- There are several areas identified as Priority Habitat within the town. ⁸
- Flooding is a particular problem in Newport Pagnell. ⁹
- Public rights of way cross some of the available sites. ¹⁰
- Employment land is in good supply across the borough.¹¹
- There is plenty of access to open countryside, as Newport Pagnell is a sustainable settlement within a rural environment. In addition Bury Field Common provides 57.6 ha of open space within the town.

¹ See the evidence base for the census documents used.

² See Appendix 4 for Schools occupancy

³ See Appendix 3 for provision of General Practitioners

⁴ See the evidence base for the car parking survey

⁵ See Appendix 6 for the sustainable transport plan

⁶ See the evidence base for the town's historical assets

⁷ See the evidence base Agricultural Land Use Classifications

⁸ See the evidence base for areas identified as Priority Habitat

⁹ See the evidence base for the Environmental Agencies Flood Zone Map.

¹⁰ See the evidence base for a list of public rights of way.

¹¹ See the evidence base for the report completed by Milton Keynes Council Employment Consultants.

4.3 THE KEY SUSTAINABILITY ISSUES

Sustainability issues which are of key significance to the Neighbourhood Plan are:

- The delivery of a housing growth strategy tailored to the needs and context of Newport Pagnell
- Sensitive development which protects and enriches the landscape and built setting
- Sustaining and improving local facilities for existing and new residents
- Ensuring economic activity meets Core Strategy requirements
- Seeking on-going improvements to sustainable transport
- Protecting and enhancing historical assets and green space
- Ensuring development delivers flood protection

4.4 APPRAISAL METHODOLOGY

The sustainability appraisal framework is the set of objectives and sub objectives against which the sustainability of draft Neighbourhood Plan has been assessed. Table 1 below. These objectives and sub objectives are tested for negative impact or positive impact with scores ranging from very positive impact on the objective to very negative impact on the objective. There are also options for no relationship with the objective. In preparing the sustainability framework the compatibility of all the sustainability objectives together was tested. The results of this assessment are reported in Table 2 below. The sustainability appraisal also assesses different options for housing growth, and tests these against the option of the base line. The 'do nothing' option identifies the likely sustainability impacts that would occur if the Neighbourhood Plan was not adopted and existing policies at the national and borough level were in place.

Further, the sustainability appraisal framework tests each of the Neighbourhood Plan Policies against the sustainability framework. Table 3. An important part of the sustainability appraisal framework is the sustainability monitoring framework. The impacts of the Neighbourhood Plan against the sustainability objectives and sustainability issues for the local area will be included in the review process outlined in the Neighbourhood Plan.

5. STAGE B and STAGE C – SETTING OUT THE OPTIONS, APPRAISING THE SOCIAL, ECONOMIC AND ENVIRONMENTAL EFFECTS OF THE PLAN

5.1 OPTIONS FOR THE PLAN

5.1.1 Housing Growth

Options for development were:

- A. No growth – this option was not available because of the demands of the Core Strategy
- B. Growth in line with the Core Strategy. This was effectively an option where a Neighbourhood Plan comes forward but doesn't change the growth in line with the Core Strategy, because growth would take place at least in line with the number of new homes proposed in the Core Strategy, and the fact that a large site capable of absorbing 680 new homes had already been identified as a Strategic Reserve Site by Milton Keynes Council.
- C. Growth beyond the requirements of the Core Strategy.

Table 1 on page 10 sets out against the Sustainability Objectives the preferred option C, which was for growth beyond the requirements of the Core Strategy. It also demonstrates how Growth Option B performs against these Sustainability Objectives. Option A was not an option, and Option B, whilst it scored highly on the sustainability objective of conserving and enhancing the town's biodiversity by retaining more greenfield land, it fell down significantly on providing good access to services and facilities, enhancing sustainable travel, and improving the town's heritage and leisure assets. It was further considered that in due course, after the end date of the Neighbourhood Plan in 2031, the Tickford Fields Farm East site would in all likelihood then be allocated to housing, without the benefits of having built in sustainable travel into the plan.

5.1.2 Site Options

Twelve different sites were identified for development. A site constraints and opportunities analysis¹² shows how these were assessed. The Sustainability Appraisal Framework in Table 1 below shows how the preferred sites meet the sustainability objectives.

The Neighbourhood Plan identifies the following sites for development:

- The North Crawley Road Industrial Estate (capacity 80 homes)
- The Tickford Fields Farm Strategic Reserve Site (capacity 600 homes)

¹² See Appendix 1 for the collective site assessment and on sheet 2 the individual site assessments

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- The Tickford Fields Farm East Site (capacity 600 homes)
- The Mustard Factory Site (capacity 5 homes)
- The Police Station Site (capacity 15 homes)
- Tesco Site (mixed housing/employment)

The other sites considered in Newport Pagnell have not been designated for new housing development. The Town Council would like to see the following uses for these sites:

- Land East of Willen Road – linear park extension/recreation/further education. This site does not contribute positively to these sustainability objectives: ensuring all sections of the community have good access to services and facilities particularly for primary schooling and medical facilities, ensuring new developments are in accessible locations in order to reduce the need for car-borne travel and/or encourage sustainable forms of transport, minimizing the risk of flooding, avoiding sites with high environmental quality or high agricultural land value, enhancing waste management, developing brown field sites first, limiting the effect of new build on access and egress to the town.¹
- Marsh End Road/Tongwell Lane – linear park extension/recreation. This site does not contribute positively to these sustainability objectives: ensuring all sections of the community have good access to services and facilities particularly for primary schooling and medical facilities, (noting however that it is capable of delivery good quality land for leisure facilities) ensuring new developments are in accessible locations in order to reduce the need for car-borne travel and/or encourage sustainable forms of transport, minimizing the risk of flooding, enhancing waste management, developing brownfield sites first, limiting the effect of new build on access and egress to the town.
- Portfields Farm – remain as agricultural. This site does not contribute positively to these sustainability objectives: maintaining and improving air quality, limiting noise pollution, ensuring all sections of the community have good access to services and facilities particularly for primary schooling and medical facilities, ensuring new developments are in accessible locations in order to reduce the need for car-borne travel and/or encourage sustainable forms of transport, avoiding sites with high environmental quality or high agricultural land value, enhancing waste management, developing brown field sites first, limiting the effect of new build on access and egress to the town.
- Kickles Farm – remain as agricultural. This site does not contribute positively to these sustainability objectives: ensuring all sections of the community have good access to services and facilities particularly for primary schooling and medical facilities, ensuring new developments are in accessible locations in order to reduce the need for car-borne travel and/or encourage sustainable forms of transport, avoiding sites with high environmental quality or high agricultural land value, enhancing waste management, developing brown field sites first, limiting the effect of new build on access and egress to the town.

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- Bury Common – to remain as common land. This site does not contribute positively to these sustainability objectives: although the site is in a very sustainable location from a transport point of view it does not reduce the need for car-borne travel for employment purposes , and it does not maintain the cultural and historical assets of the town, avoid sites with high environmental quality or high agricultural land value, enhance waste management, develop brown field sites first or limit the effect of new build on access and egress to the town,.
- Nampak Factory – to remain as employment land. This site does not contribute positively to these sustainability objectives: ensuring all sections of the community have good access to services and facilities particularly for primary schooling and medical facilities, ensuring new developments are in accessible locations in order to reduce the need for car-borne travel and/or encourage sustainable forms of transport, enhancing waste management, limiting the effect of new build on access and egress to the town, improving social inclusion, creating safer environments to live in or taking into account the impact of loss of existing employment.

5.2 THE SUSTAINABILITY APPRAISAL FRAMEWORK TABLE

5.2.1 Assessment Measures

Very Positive ++

Effect Description and Key

The Neighbourhood Plan contributes significantly to the achievement of the objective

Positive +

The Neighbourhood Plan contributes to the achievement of the objective but not significantly

Neutral 0

The Neighbourhood Plan does not have an effect on the achievement of the objective

Negative -

The Neighbourhood Plan detracts from the achievement of the objective but not significantly

Very Negative --

The Neighbourhood Plan detracts significantly from the achievement of the objective

No Relationship /

There is no clear relationship between the Neighbourhood Plan and the achievement of the objective, or the relationship is negligible

Uncertain?

The Neighbourhood Plan has an uncertain relationship to the objective, the effect is dependent on how the Plan is implemented or there is insufficient information to make an assessment

LT

Long Term effect

ST

Short Term effect

For the benefit of people who are colour blind or those without colour printers, the symbols next to the colour key above are used.

Long and short term effect symbols indicate whether a particular rating has a long or short term implication.

5.2.2 Primary Sustainability Objectives are to:

Social Objectives

- 1 Ensure everyone has the opportunity to live in an affordable, sustainably constructed home
- 2 Protect and improve resident's health and reduce health inequalities
- 3 Improve social inclusion, reduce inequality and value diversity and equality
- 4 Create safer environments to live in and reduce the fear of crime
- 5 Ensure all sections of the community have good access to services and facilities

Environmental Objectives

- 6 Mitigate and adapt to climate change
- 7 Maintain and improve air quality
- 8 Maintain and improve water quality and minimize the risk of flooding
- 9 Reduce waste generation and encourage sustainable waste management
- 10 Conserve and enhance the town's biodiversity
- 11 Protect and enhance the soil quality throughout the town
- 12 Conserve and enhance the town's heritage and cultural assets
- 13 Protect, enhance and manage the character and appearance of the landscape and townscape
- 14 Limit noise pollution
- 15 Limit and reduce road congestion and encourage sustainable transport

Economic Objectives

- 16 Ensure high and stable levels of employment and encourage the creation of new businesses
- 17 Maintain and improve the vitality of town and local centre

The Sustainability Appraisal Objectives are the same objectives as those being used to assess the sustainability of the emerging Local Plan as part of its Strategic Environmental Assessment.

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Table 1

Assessment of the Growth Options against the Sustainability Objectives

No.	SA OBJECTIVE	SUB OBJECTIVE/APPRaisal CRITERIA	PREFERRED GROWTH OPTION C	ALTERNATIVE GROWTH OPTION B	LOCAL POLICIES	COMMENTARY AND RECOMMENDATIONS OF WHERE THE PLAN COULD BE IMPROVED
	Social Objectives					
1	Ensure everyone has the opportunity to live in an affordable, sustainably constructed home	Will the Neighbourhood Plan Meet the identified housing needs? Provide affordable housing?	Housing growth beyond the Core Strategy LT++ 30% affordable housing with 35% of these in shared ownership and 65% in social rented. LT++	Housing growth to meet Core Strategy ST++ 30% of affordable housing but not as significant as growth option C. ST+ This option would not secure affordable housing for Newport Pagnell residents. LT--	MKC Core Strategy CS2, CS9 & CS10. MKC Local Plan Policy H4	
		Contribute to sustainable carbon emissions?	No effect on this objective 0	No effect on this objective 0	MKC Local Plan Policy D4.	Covered by Local Policy

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2	Protect and improve resident's health and reduce health inequalities	Will the Neighbourhood Plan meet the health needs of residents?	Provides for a well-being facility on site, and encourages walking and cycling through provision of redways. LT++	There would be no additional health facility. LT— No guaranteed provision of cycle routes on site ?	Core Strategy CS18	
3	Improve social inclusion, reduce inequality and value diversity and equality.	Will the Neighbourhood Plan: Improve social inclusion? Reduce inequality?	Provides 30% affordable homes. Provides on-site school, shopping facilities and play areas through integrated facilities that form part of the development. LT+	Introducing new residents to the town without commensurate facilities leads to uncertainly in travel plans, traffic impact, and offers poorer accessibility to key services. LT+	Local Plan Policy H4. Core Strategy CS18 & CS17	
4	Create safer environments to live in and reduce the fear of crime.	Will the Neighbourhood Plan: Reduce the opportunities for crime? Affect the fear of crime and feelings of safety? Improve road safety?	New housing should meet secure by design standards. LT+ Local facilities, particularly a local school will ensure people get to know each other. LT+ Improves safe and enjoyable movement by pedestrians and cyclists throughout the parish. Seeks to reduce road speeds to 20 mph. LT++	New housing should meet secure by design standards. LT+ No major local provision of amenities or of local school. LT- No design brief to require 20 mph zone, or cycle/pedestrian routes therefore impact unknown ?	Core Strategy CS12	
5	Ensure all sections of the community have good access to services and facilities	Will the Neighbourhood Plan: Enhance services and facilities for the town?	Improves signage, historical referencing, town centre	Has no effect on the Town Centre. ?		

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		Ensure individual developments provide good facilities and services?	<p>parking and open spaces for the town.</p> <p>The largest new development includes local facilities such as a well-being provision, open space, play areas, pre-and primary school and local shopping.</p>	<p>No local schools provision, neighbourhood play area, local shopping, or well-being provision. LT++ New residents would have to travel further, and some facilities are under strain. Existing deficiency in playing field provision would remain. LT++</p>		
	Environmental Objectives					
6	Mitigate and adapt to climate change.	<p>Will the Neighbourhood Plan:</p> <p>Minimize and reduce the emission of greenhouse gasses?</p> <p>Ensure new developments are in accessible locations in order to reduce the need for car born travel and/or encourage sustainable forms of transport?</p>	<p>No effect on this objective. 0</p> <p>Ensures that the major new housing development provides its own range of facilities, particularly reducing the need for school born traffic, and encourages sustainable transport. LT++</p> <p>The major new housing</p>	<p>No effect on this objective. 0</p> <p>Housing provided with limited facilities increasing the need for car born travel. LT++</p> <p>No guaranteed provision of cycle routes on site LT+</p> <p>The new housing</p>	<p>Local Plan Policy D4</p> <p>SPD Sustainable Construction</p> <p>Core Strategy CS12 & CS13</p> <p>Core Strategy CS12</p>	<p>Covered by Local Policy</p>

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		Promote, enhance or create green infrastructure?	development will provide its own play area and neighbourhood park and will provide enhancement to existing green space. LT++	would contribute a play area and open space, but not the comprehensive range obtained from a large scale development. LT+		
7	Maintain and improve air quality	Will the Neighbourhood Plan Maintain and improve air quality?	Avoids siting housing next to the M1. 0	Avoids siting housing next to the M1. 0		Potential improvements to the Neighbourhood Plan: Plant trees near developments, and ensure housing meets highest sustainable standards.
8	Maintain and improve water quality and minimize the risk of flooding	Will the Neighbourhood Plan: Maintain water quality? Minimize the risk of flooding?	No effect on this objective. 0 Housing is not allowed in areas of high flood risk and development sites require a full flood risk assessment and sustainable urban drainage. /	No effect on this objective. 0 Housing is not allowed in areas of high flood risk and development sites require a full flood risk assessment and sustainable urban drainage. /	Core Strategy CS12 & CS13	Covered by Local Policy
9	Reduce waste generation and encourage sustainable waste management.	Will the Neighbourhood Plan result in new or enhanced waste management?	Proposed move of Waste Recycling Centre which will result in improved facility. Uncertain, potentially positive long term benefit?/LT+	No impact 0		

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10	Conserve and enhance the town's biodiversity	Will the Neighbourhood Plan Provide opportunities for local habitat creation and species conservation enhancement?	Major development site will require a full environmental assessment, and linear open space along the side of the brook and retention of trees and hedgerows will be required. ST--	Major development site will require a full environmental assessment, and linear open space along the side of the brook and retention of trees and hedgerows will be required. However, this option involves a smaller loss of biodiversity. ST-	Core Strategy CS19 Local Plan NE3	Potential improvements to the Neighbourhood Plan: Investigate enhancement to existing habitat or create new habitat.
11	Protect and enhance the soil quality throughout the town.	Will the Neighbourhood Plan: Protect high grade agricultural land? Develop brown field sites first?	The major development site is mainly grade 3 and 4 agricultural land whereas other sites that have not been included are grade 2. Avoids sites with high environmental quality or high agricultural land value. LT+ The North Crawley Road Industrial site, the Tesco site, the Mustard Factory and the	The major development site is mainly grade 3 and 4 agricultural land whereas other sites that have not been included are grade 2. Avoids sites with high environmental quality or high agricultural land value. LT+ However, should other land options come forward first there is potential for uncertainty here. ? This option does not include the Tesco site and therefore loses		

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			Police Station site are proposed for redevelopment in preference to other green field sites. LT++	the opportunity to develop a brownfield site. LT+		
12	Conserve and enhance the towns heritage and cultural assets	Will the Neighbourhood Plan Protect and enhance the town's built heritage including its conservation area and its historic buildings?	Proposes to provide historical information panels concerning the town's heritage. Proposes signage of historical assets in the town. LT+	No relationship/	Core Strategy CS19	Potential improvements to the Neighbourhood Plan: Include retention of three historical building on the Tesco site.
13	Protect, enhance and manage the character and appearance of the landscape and townscape.	Will the Neighbourhood Plan: Reinforce landscape setting Enhance and respect the local build character	Builds on an area of attractive landscape for main development site. ST-- Also uses brownfield sites. LT++ No effect on this objective. Main development site creates its own character. 0	Builds on an area of attractive landscape for main development site. ST- Uses some but not all brownfield sites LT+ No effect on this objective. Main development site creates its own character. 0		Not enough brownfield sites to meet Core Strategy requirements.
14	Limit noise pollution	Will the Neighbourhood Plan limit noise pollution?	Choses sites that are not close to M1. Main site will require noise assessment and mitigation. / Potential for relocation and improvement of household waste site. LT-	Choses sites that are not close to M1. Main site will require noise assessment and mitigation. / No potential for relocation of household waste site. LT-	Core Strategy CS12	

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15	Limit and reduce road congestion and encourage sustainable transport	<p>Will the Neighbourhood Plan: Limit the effect of new build on access and egress to the town?</p> <p>Encourage sustainable transport?</p>	<p>The major new development has good access to the grid network, is on the edge of the town, and has minimal traffic flow through the town. LT-</p> <p>Incorporates redways and bus routes through the development. Places a pre-and primary school on site to reduce car travel to school.</p>	<p>The major new development has good access to the grid network, is on the edge of the town, and has minimal traffic flow through the town. However 600 homes will produce less traffic than 1200. LT-</p> <p>No guaranteed cycle route provision, bus route provision, or pre- and primary school LT-.</p>	Core Strategy CS11, CS12	Neighbourhood Plan takes into account the least travelled exit/entrance from the town.
Economic Objectives						
16	Ensure high and stable levels of employment and encourage the creation of new businesses.	<p>Will the Neighbourhood Plan: Take into account the impact of employment?</p>	<p>Considers the socio economic factors outlined in the census, and the MKC Employment survey to assess whether additional employment land is required. LT-</p>	<p>Takes no account of employment. LT-</p>	Core Strategy CS2, CS15 & CS16	The MKC 2015 employment survey demonstrates that there is more than sufficient employment land within Milton Keynes to meet the employment needs of the whole borough. MKC does

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		Encourage the creation of new businesses?	Classifies the Tesco site as mixed employment/housing, thereby encouraging employment on the site. LT+			not separate employment between rural and urban areas.
17	Maintain and improve the vitality of town and local centres	Will the Neighbourhood Plan Safeguard and improve the shops, services and leisure facilities to meet the needs of the community?	Does not reduce the extent of the primary shopping area. LT+ Encourages residents in new homes into the town centre through the provision of additional parking, signage and historical notice boards. Provides cycle routes into the town centre. Retains and seeks to improve existing leisure facilities. LT++	Does not reduce the extent of the primary shopping area. LT+ Makes no contribution to the town centre. 0	Core Strategy CS4	

Alternatives to the above two growth strategies.

Table 1 does not cover the eventuality of an initial Option B approach, followed after the conclusion of a Neighbourhood Plan, by development of the Tickford Fields Farm East site. This option which is viewed as likely, will result in many of the short term benefits of Option B turning into long term negatives, particularly those relating to provision of infrastructure, biodiversity, and loss of further greenfield land.

Table 1 above also does not cover a scenario where the Neighbourhood Plan is not adopted, and the Core Strategy prevails. In this eventuality, whilst it is a known fact that development will take place in Newport Pagnell, other sites that have been rejected in the site analysis review (see Appendix 1 of the Neighbourhood Plan) may come forward for development prior to the Tickford Fields Farm sites.

5.3 SUSTAINABILITY OBJECTIVES COMPATIBILITY MATRIX

Table 2 below shows the compatibility between the sustainability objectives, highlighting the difficulties of simultaneously addressing social, environmental and economic objectives. By their very nature, having different priorities, there are bound to be areas of conflict. Identifying these conflicts helps to ensure policies address such conflicts.

Sustainability Objectives Compatibility Matrix Table 2

Objective No.	17	16	15	14	13	12	11	10	9	8	7	6	5	4	3	2	1
1	Green	Purple	Purple		Yellow	Green	Green	Yellow	Green	Yellow		Green	Green	Green	Green	Green	
2	Green		Green		Yellow	Green		Purple	Green			Green	Green	Green	Green		
3												Green	Green	Green			
4			Green									Green	Green				
5	Green		Yellow		Yellow	Green			Green								
6			Yellow				Yellow		Green								
7			Yellow														
8								Yellow									
9				Green													
10					Red		Yellow										
11					Yellow												
12	Green				Green												
13	Green		Yellow														
14			Yellow														
15	Green																
16	Green																
17																	

Key

- Area of compatibility
- Area of compatibility and potential conflict
- Area of uncertainty
- Area of potential conflict
- No/insignificant link

Sustainability Objectives which offer the potential for conflict are:

5.3.1 Conflict between designating land for housing versus land designated for employment.

5.3.2 Conflict between protecting diversity and providing additional housing. In certain cases, biodiversity offsetting could help avoid this conflict by setting a requirement to compensate for habitats and species lost to development in one area, with the creation, enhancement or restoration of habitat in another.

5.4 SUSTAINABILITY APPRAISAL ON THE POLICIES OF THE NEIGHBOURHOOD PLAN.

Policy NP1: Preferred sites for housing development

Objective: Provision of new housing to meet Core Strategy targets, together with the necessary infrastructure.

Policy: Land for housing is allocated on the following sites:

- North Crawley Road Industrial Estate.
- Tickford Fields Farm Strategic Reserve Site
- Tickford Fields Farm East Site
- Police Station, High Street
- Former Mustard Factory, Union Street.
- Tesco site – this site should be mixed employment/housing.

Policy NP2: Tickford Field Estate Site Specific Policies

Objective: Housing sited in the most sustainable locations as outlined in the site assessment constraints and opportunities analysis.

Policies: Include the allocation of three sites into one joint estate, governed by a Development Brief, with an average density of 35 dph, a housing mix and tenure that meets the needs of residents, a comprehensive Transport Assessment and mitigation, a minimum requirement of three vehicular access points including a bus route, and cycle routes, a pre-school and primary school on site, a local shopping centre on site, a health and well-being facility on site, a Neighbourhood Play Area on site, a net gain to bio-diversity, adequate treatment of the waste facility, a contribution to the Town Centre and sustainable transport initiatives, a Flood Risk Assessment and required mitigation, and a significant financial contribution to off-site playing fields and auxiliary development, including the purchase costs of recreational land.

Policy NP3: Tesco Site Specific Policies

Objective: Housing sited in the most sustainable locations as outlined in the site assessment constraints and opportunities analysis.

Policies: Including a requirement for an allocation of employment on site, retention of historical buildings on site, a requirement not to exceed development of two storey height, and a protection of both the Conservation Area and the views of the parish church, a Transport Assessment and mitigation, a Flood Risk Assessment and mitigation, a Contamination Report, pedestrian, improvement of cycle and bus links as well as a financial contribution to improving links to the town centre, retention of an oak tree, and proposals to enhance biodiversity, a financial contribution to off-site open space, play areas, the enhancement of the town centre, purchase of land for additional off site playing fields and auxiliary requirements, including land purchase costs.

Policy NP4: Windfall sites

Objective: Housing sited in the most sustainable locations as outlined in the site assessment constraints and opportunities analysis.

Policy: Small, well designed residential sites within the development boundary which do not have a detrimental effect on the surrounding area will be supported.

Policy NP5: Housing Mix and Tenure

Objective: Provision of mix of housing, affordable housing, and housing to meet residents' needs

Policy a: To meet identified needs within the community at least 30% of all new housing developments on all sites of 15 dwellings or more shall be high quality affordable housing. 10% of all new affordable housing will be initially reserved for people with a strong local connection with Newport Pagnell, whose housing needs are met by the open market. A strong local connection means the applicant either:

- (1) has lived in Newport Pagnell for 5 years or more, or
- (2) has parents or children who have lived in Newport Pagnell for 5 years or more, or
- (3) has been employed in Newport Pagnell for 5 years or more.

Any reserved dwelling remaining unallocated to a person with a strong local connection after 6 months of its completion may then be allocated in accordance with the normal allocation policy.

Policy b: Of the 30% affordable housing required by Policy NP5A, 10% shall be shared ownership and 20% shall be social rented housing.

Policy NP6: Cycle, Pedestrian and bus routes

Objective: Improve movement into and around the town, specifically promoting cycling, walking and ease of access for the disabled.

Policy: Major developments will be planned with integrated cycle and pedestrian routes.

Opportunities will also be sought to improve the cycle and pedestrian network.

Policy NP7: Developer contribution Policy

Objective: Adequate provision of school places, promotion of cycling, walking and ease of access for the disabled, ensuring quality green space exists in the town, encouraging development that strengthens sports, recreation, play and culture, and ensuring the development enhances the town.

Policy: All housing developments of 10 or more homes shall contribute financially to:

- the off-site provision of education that is required as a result of the development.
- improving existing play areas in the town.
- off-site provision of playing fields.
- enhancement of public open space within the town.
- the promotion of the Town Centre, its historic importance and fabric, its directional signage and to the enhancement of Town Centre parking provision.

Policy NP 8: Playing Fields and Associated Development

Objective: Encourage development that strengthens sport, recreation and play

Policy: Development proposals for enhanced recreation and sporting facility will be supported on the land to the East of Willen Road, which is designated as a linear park extension in the Local Plan. Examples of such developments are: playing fields, sports pitches, changing rooms, car parking, pavilion provision, auxiliary sporting structures, cycle tracks, sports halls, etc. Proposals will be supported subject to them not prejudicing the primary function of the linear park as an outdoor recreational facility.

Table 3 below shows an assessment of the above Neighbourhood Plan Policies against the Sustainability Objectives.

Neighbourhood Plan Policies compared to the Sustainability Objectives

Table 3

NEIGHBOURHOOD PLAN POLICIES APPRAISED AGAINST SUSTAINABILITY OBJECTIVES																	
	Sustainability Objective																
Policy No.	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
NP1	Green	Green	Green	Green	Green	Purple	Red	Yellow	Purple	Yellow	Green	Green	Yellow	Green	Yellow	Yellow	Purple
NP2	Green	Green	Green	Green	Green	Yellow	Yellow	Yellow	Purple	Yellow	Yellow	Green	Yellow		Yellow		Green
NP3	Green			Green	Green	Yellow	Yellow	Yellow		Green	Green	Green	Green		Purple	Yellow	Green
NP4	Green																Purple
NP5	Green		Green	Purple	Green										Green		Green
NP6		Green	Green		Green		Green								Green		Green
NP7		Green	Green		Green							Green	Purple		Green		Green
NP8		Green	Green		Green					Green		Green			Green		Green

KEY

- Area of compatibility
- Area of compatibility/ conflict
- Area of uncertainty
- Area of potential conflict
- No/insignificant link

Areas of conflict and compatibility

Whilst areas of compatibility and potential conflict and areas of conflict exist when assessed against several objectives of the Neighbourhood Plan, these areas of conflict would occur in most situations where any development is taking place. The authors of this report hold the view that choosing different options or policies for development would not result in a reduction of such areas of conflict, and in many cases would increase the number of cases where such conflict occurs.

NP1 has potential conflict with sustainability objective 7, to sustain and improve air quality, due to the direct impact of traffic movement and additional housing growth. However there would be potential conflict with any site allocated for development, and the sites chosen avoid proximity to the M1. Climate change mitigation and adaption as a sustainability objective, shows areas of both compatibility and conflict with two Neighbourhood Plan Policies. The major development site will contain its own school and local centre to minimize the need for travel. However the Neighbourhood Plan does not contain design specifications outside of those required by Local Planning Policy D4. Because the Neighbourhood Plan proposes a major development on a greenfield site, policies NP1 and NP2 conflict with SA objective 8 (Improve water quality and minimize the risk of flooding.) However, housing is not allowed in areas of high flood risk, and development sites including the Tesco site require a full flood risk assessment and mitigation measures. Neighbourhood Plan policy NP2 conflicts with SA 10 (Conserve and enhance the town’s biodiversity) because it releases a greenfield site for development. However a full EIA

will be required at planning application stage, and mitigation measures include linear open space along the side of the brook, as well as the retention of trees and hedgerows as specified in NP2 and the development brief. The Core Strategy would require in any event a greenfield site to meet its demands, and the Neighbourhood Plan offers the best options for preserving biodiversity of all the available sites. By releasing a greenfield site for development under NP2, it has an effect on SA objective (protect and enhance soil quality throughout the town) but the chosen greenfield site has lower grade agricultural land than other available sites. The Neighbourhood Plan proposed development on a site which is an area of attractive landscape. Part of this site is listed as a Strategic Reserve Site, which means it would have significant advantages if a planning application came forward. There are areas of compatibility and conflict with SA objective 15 (limit and reduce road congestion and encourage sustainable transport.) Conflict arises because there will be more cars on the road, but the plan takes into account the most and least used exits from the town, and also contributes to a sustainable transport plan. Policy NP 2 specifically provides for a school within the community, thus reducing the need to travel and it requires a bus route through the development. The Neighbourhood Plan does release an employment site, the derelict North Crawley Road Industrial Estate, and therefore conflict arises with SA objective 16 (ensure high and stable levels of employment and encourage the creation of new businesses). Some employment is encouraged in the Plan, on the Tesco site, and on Tickford Fields Estate, with a local centre and school.

6. STAGE D EXECUTIVE SUMMARY, SUMMARY OF FINDINGS AND CONSULTING ON THE PLAN

6.1 THE SUSTAINABILITY REPORT

The Neighbourhood Plan steering group assessed the Neighbourhood Plan for sustainability against the following sustainability objectives, which:

1. Ensure everyone has the opportunity to live in an affordable, sustainably constructed home
2. Protect and improve residents' health and reduce health inequalities
3. Improve social inclusion, reduce inequality and value diversity and equality
4. Create safer environments to live in and reduce the fear of crime
5. Ensure all sections of the community have good access to services and facilities
6. Mitigate and adapt to climate change
7. Maintain and improve air quality
8. Maintain and improve water quality and minimize the risk of flooding
9. Reduce waste generation and encourage sustainable waste management
10. Conserve and enhance the town's biodiversity
11. Protect and enhance the soil quality throughout the town
12. Conserve and enhance the town's heritage and cultural assets

The Sustainability Appraisal

13. Protect, enhance and manage the character and appearance of the landscape and townscape
14. Limit noise pollution
15. Limit and reduce road congestion and encourage sustainable transport
16. Ensure high and stable levels of employment and encourage the creation of new businesses
17. Maintain and improve the vitality of town and local centres.

6.1.1 Findings of the Sustainability Appraisal.

Generally the Newport Pagnell Neighbourhood Plan was found to have a relatively high degree of correspondence against sustainability objectives with only one aspect of the Plan shown to deviate considerably from sustainability objective 13, this being that the Plan builds on an Area of Attractive Landscape for the main development site. This deviation was felt to be unavoidable, in that existing brownfield sites would not collectively support the housing numbers required by the Core Strategy, and all other available sites were also Areas of Attractive Landscape.

Whilst there was deviation in that building would not improve air quality, there was scope in the Plan for adding net biodiversity gain measures. There were two areas where the Plan both supported a sustainability objective and was in conflict with it. The first sustainability objective where this occurred was to limit and reduce road congestion and encourage sustainable transport. Whilst the Plan significantly encouraged sustainable transport, there was no doubt that building around 1400 new homes would increase traffic considerably. Every effort was made to ensure that siting of the major new development had the least impact on exits from the town. The second sustainability objective where this occurred was to ensure high and stable levels of employment and encourage the creation of new businesses. If a site was allocated for housing it reduced opportunities for employment sites, and the Neighbourhood Plan supports the loss of two employment sites but evidence has shown that more than sufficient employment land exists in the wider borough of Milton Keynes to cater for these new homes.

In assessing the Neighbourhood Plan against the Sustainability Objectives there were three possibilities for potential improvements to the Plan.

- Plant trees near developments, and ensure housing meets highest sustainable standards.
- Investigate enhancement to existing habitat or create new habitat.
- Include retention of three historical buildings on the Tesco site.

The Neighbourhood Plan was then reviewed to build in these three elements of sustainability.

The steering group also reviewed sustainability objectives against each other and inevitably there was found to be some tension between the sustainability objectives of employment versus housing land allocation and housing versus retention of attractive landscape. In general there was more compatibility than deviation.

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Another sustainability assessment was undertaken on the options for housing growth. The following options were considered:

To either have:

- No growth – this option was not available because of the demands of the Core Strategy
- Growth in line with the Core Strategy. This was effectively an option where a Neighbourhood Plan comes forward but doesn't change the growth in line with the Core Strategy, because growth would take place at least in line with the number of new homes proposed in the Core Strategy. Under this option growth would take place at least in line with the number of new homes proposed in the Core Strategy, and the fact that a large site capable of absorbing 680 new homes had already been identified as a Strategic Reserve Site by Milton Keynes Council.
- Growth beyond the requirements of the Core Strategy.

Extending building from the Core Strategy requirements to 1280 homes on the Tickford Field Estate also meant that an Area of Attractive Landscape would be built on, leading to a short term incompatibility with objective 13, and thus downgrading the environmental sustainability factors. However, it was felt that in the period following the Neighbourhood Plan's duration, this area of land would attract developers, particularly given the building that had taken place earlier on the site. Therefore in the longer term, the advantages afforded to the environment by not building on the eastern side of the site would be overcome, without gaining the commensurate social benefits of a cohesive community with suitable infrastructure.

The assessment therefore showed that the last option, to have growth beyond the core strategy, was more sustainable, despite impacting on an Area of Attractive Landscape and creating more traffic, because it provided good access to services and facilities, enhanced sustainable travel, and improved the town's heritage and leisure assets.

A third sustainability assessment was undertaken comparing sustainability objectives against the policies of the Neighbourhood Plan. Here it was established that there was a high level of compatibility against most objectives. Areas where potential conflict existed were:

- Policy NP2: The Tickford Fields Estate development site takes approximately 1280 homes. Conflicts arise when compared against sustainability objectives to conserve and preserve biodiversity, protect and enhance the soil quality throughout the town, and protect, enhance and manage the

The Sustainability Appraisal

character and appearance of the landscape and townscape. However, it was felt that all other site options other than brownfield sites which were limited in capacity, would score worse against these sustainability objectives. Even taking all brownfield sites collectively, without adding in other greenfield options it was not possible to meet the requirements of the Core Strategy.

- Policy NP1: Preferred sites for housing development. Whilst this policy would not improve air quality, enhancement measures could be built into the plan to ensure trees were planted on housing sites and that there was net biodiversity gain.

Having been tested for sustainability using three different methods, it is believed that the Plan is (a) sustainable for the future, and succeeds in achieving the overarching objective of meeting the needs of the present without compromising the ability of future generations to meet their own needs.

6.1.2 High Level Findings of the Neighbourhood Plan were:

- The Neighbourhood Plan was for the most part in conformity with the three sustainability elements, these being social, economic and environmental factors. Social factors ranked highly, but there were elements of both the economic and environmental factors being met.
- The Neighbourhood Plan was in conformity with sustainability objectives, particularly when considering a long term view of development in the town.
- Whilst there was conflict between the objectives of protecting biodiversity and providing additional housing there was scope to introduce biodiversity offsetting into the Plan, which has now been done.
- Air quality would be affected by the growth in the town, but there was scope to introduce tree planting into the Plan, which has now been done.
- Transport links would be affected by growth in the town, but growth has been introduced in such a way as to minimize disruption, particularly through the town centre.
- There was tension between providing employment land or housing land, but the Milton Keynes Employment Strategy provides sufficient land for employment outside the rural town.

6.2 CONSULTING ON THE SUSTAINABILITY APPRAISAL

This consultation takes place during a six week pre submission consultation, after which the Plan is formally submitted to Milton Keynes Council.

7. STAGE E - MONITORING THE IMPLEMENTATION OF THE PLAN.

It is important to monitor the implementation of the Plan, to make sure policies are sustainable and to check there are no negative impacts. This will be undertaken by the Town Council during the review periods built into the Plan.