

Strategic Environmental Assessment (SEA) for the Newport Pagnell Neighbourhood Plan

Environmental Report Update

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Quality information

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Non-Technical Summary

Introduction

AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging Newport Pagnell Neighbourhood Plan (NPNP).

The Newport Pagnell Neighbourhood Plan is being prepared by the Town Council in the context of the adopted Milton Keynes Local Plan (Plan MK).

Once ‘made’ the Neighbourhood Plan will have material weight when deciding on planning applications, alongside the Plan MK.

SEA is a process for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising positive effects. SEA of the NPNP is a legal requirement.¹

Central to the required SEA process is publication of an Environmental Report for consultation alongside the draft plan that essentially presents an assessment of the draft plan and “reasonable alternatives”.

An Environmental Report was published alongside the Draft (‘Pre-submission’) NPNP in 2023, work was subsequently undertaken to take account of the consultation responses received, including from Milton Keynes City Council.

This current report is an **Environmental Report Update**. It is prepared for submission alongside the NPNP and to inform the subsequent ‘publicity’ period required under Regulation 16 of the Neighbourhood Planning Regulations.

This is a Non-Technical Summary (NTS) of the Environmental Report Update.

Structure of the report / this NTS

SEA reporting essentially involves answering the following questions in turn:

1. What has plan-making / SEA involved **up to this point?**
 - including in relation to ‘reasonable alternatives’.
2. What are the SEA findings **at this stage?**
 - i.e., in relation to submission NPNP.
3. What happens next?

Each of these questions is answered in turn below.

However, firstly there is a need to set the scene further by answering the questions ‘What is the Plan seeking to achieve?’ and ‘What’s the scope of the SEA?’

¹ Regulation 15 of the Neighbourhood Planning Regulations requires that each Neighbourhood Plan is submitted to the Local Authority alongside either: A) an environmental report; or, B) a statement of reasons why SEA is not required, prepared following a ‘screening’ process. The NPNP was subject to screening in September 2021, with the outcome being a decision that SEA is required.

What is the Plan seeking to achieve?

It is important to be clear that the current plan, once made, will be the third iteration of the NPNP, hence the ‘plan-making’ process can alternatively be thought of as a process ‘modifying’ the adopted NPDP (2021).

The scope of modifications under consideration is fairly limited, as discussed within a Modification Statement published by the Town Council alongside the Pre-submission NPNP in 2023. The statement explains that a key focus is “the future successful role of the town centre in the life of the town” and, to this end, the Pre-submission NPNP (2023) presented a new policy on Living in the Town Centre (Policy NP3). Other new policies in the Pre-submission NPNP (2023) covered the Green and Blue Infrastructure Network (Policy NP4) and Aston Martin Heritage Centre (NP5).

The current intention is to retain all three of the new policies proposed in 2023, although there is a need to consider some adjustments, particularly in light of comments received from Milton Keynes City Council (MKCC).

What is the scope of the SEA?

The scope of the SEA is reflected in a list of topics and objectives which, taken together, indicate the parameters of the SEA and provide a methodological ‘framework’ for assessment. A summary framework is presented below.

Table A: The SEA framework

SEA topic	SEA objective(s)
Air quality	<ul style="list-style-type: none"> Improve air quality in the NPNP area and minimise and/or mitigate against all sources of environmental pollution.
Biodiversity	<ul style="list-style-type: none"> Maintain and enhance the extent and quality of biodiversity and geodiversity habitats and networks within and surrounding the Plan area.
Climate change	<ul style="list-style-type: none"> Reduce the contribution to climate change made by activities in the Plan area. Support the resilience of the Plan area to the potential effects of climate change, including flood risk.
Community wellbeing	<ul style="list-style-type: none"> Ensure growth in the Plan area is aligned with the needs of all residents and in suitably connected places, supported by the appropriate and timely provision of infrastructure to enable cohesive and inclusive communities.
Historic environment	<ul style="list-style-type: none"> Protect, conserve and enhance the historic environment within and surrounding the Plan area.
Landscape	<ul style="list-style-type: none"> Protect and enhance the character and quality of the immediate and surrounding landscape, including green infrastructure corridors.
Land, soil and water resources	<ul style="list-style-type: none"> Ensure the efficient and effective use of land. Protect and enhance water quality and use and manage water resources in a sustainable manner.
Transportation	<ul style="list-style-type: none"> Promote sustainable transport use and reduce the need to travel.

Plan-making / SEA up to this point

An important element of the required SEA process involves assessing ‘reasonable alternatives’ in time to inform development of the draft proposals, and then publishing information on reasonable alternatives for consultation alongside the draft proposals.

As such, Part 1 of the report presents information on:

- Defining reasonable alternatives
- Assessing reasonable alternatives
- Selecting the preferred option

Defining reasonable alternatives

The decision taken in 2023, as reported in the Environmental Report published alongside the Pre-submission NPNP, was to focus attention on new proposed **Policy NP3** (Living in the Town), and the same approach is taken in this current Environmental Report Update. The aim of Policy NP3 is to encourage targeted new residential development in the town centre to help bolster its vitality and viability, and also to realise opportunities to improve walking routes. Certain sites are identified – accounting for detailed work in respect of heritage value, given the Conservation Area designation – and criteria to guide future planning applications are proposed.

However, it is important to be clear that the intention of the policy is not to formally ‘allocate’ these sites. Rather, any development that comes forward will be ‘windfall’. The sites in question could all potentially have come forward as windfall in any case, and the effect of the policy is not to significantly alter the potential for development.

In **summary**, the decision was again taken to focus attention on Policy NP3. The reasonable alternatives are also unchanged, namely: **1)** the emerging proposed NPNP; and **2)** progressing the NPNP without Policy NP3.

Briefly, there is also a need to note the decision *not* to define and assess reasonable alternatives (RAs) in respect of either Policy NP1 (Settlement boundary and new housing) or Policy NP2 (Tickford Fields Development Site).

In short, this is because the scope of proposed changes / potential changes to these policies are of limited significance. With regards to **Policy NP1**, there is a question regarding the number of homes supply to expect from the Policy Station Site (it is an existing allocation for 14 homes, but the site is subject to flood risk, hence there is a case for a more flexible approach), but this is considered to be a fairly minor issue, that need not be formally explored via consideration of RAs. Also, there is a proposed change regarding policy support for development of garden land; however, again, the scope of the change is considered to be of limited significance. With regards to **Policy NP2**, the site has planning permission (for ~930 homes), hence there is little to be gained by considering policy options.

Assessing reasonable alternatives

Table B presents summary findings. With regards to methodology, within each row (i.e. for each element of the SEA framework) the columns to the right-hand side: 1) **rank** the alternatives in order of performance; and 2) **categorise** performance in terms of effects on the baseline (using red, amber and light green and dark green).² Also, '=' is used to denote instances where the alternatives perform on a par.

Table A: Alternatives assessment findings

Topic	Option 1 NPNP approach (includes Policy NP3)	Option 2 Reasonable alternative (deletes Policy NP3)
Air quality	=	=
Biodiversity	=	=
Climate change	2	1
Community wellbeing	2	1
Historic environment	2	1
Landscape	=	=
Land, soil and water resources	=	=
Transportation	=	=

Discussion

The first point to make is that alternatives assessment findings are broadly unchanged from those presented in the Environmental Report (2023). It is immediately evident that the appraisal flags a potential preference for Option 2 under three sustainability topic headings, and taking each of these in turn:

- **Climate change** – one of the identified sites, namely 1 Station Road, is subject to flood risk, and it is noted that permission has been refused for development on this site of several occasions in the last 15 months (refs. 21/02388/FUL, 22/02078/FUL and 23/01163/FUL) on flood risk sequential test grounds. An appeal is now pending consideration of the latest refusal.

² **Red** indicates a significant negative effect; **amber** a negative effect that is of limited or uncertain significance; **light green** a positive effect that is of limited or uncertain significance; and **dark green** a significant positive effect. **No colour** indicates broadly neutral effects.

MKCC raised some concerns regarding whether the case for residential development is strong enough, in light of other available site options in the town centre subject to lower flood risk (i.e. sites that are sequentially preferable from a flood risk perspective), to warrant a policy criterion in Policy NP3. The view of the Town Council is that the case is strong enough (such that the site passes the 'sequential test'), assuming that policy criteria are met (N.B. the proposed policy criteria are unchanged from the pre-submission stage).

Regardless, it is important to recall that the proposal is not to allocate the site (such that its development can be assumed and supply of new homes from the site accounted for). Rather, as discussed, the aim is simply to set policy criteria to guide any future planning application, and any future planning application would need to pass the sequential test. Existence of the policy criteria may assist with passing the sequential test, as clearly the effect of the policy is to set out a degree of support for residential development, but the effect of the policy is limited on account of this not being a formal allocation.

- **Community wellbeing** – the key consideration here is identification of the library site within Policy NP3 under Option 1. MKCC questioned this through the consultation in 2023, stating: *"There is no evidence that the library is looking to relocate or that the Town Council's offices would be an acceptable alternative site. Relocation of the Town Council offices is dependent on redevelopment of the Police Station site, but [this is uncertain]. As stated previously, the Library Service has invested quite heavily in the building and would need to be consulted on any proposals to relocate. Both the Property team and the Library Service would have to work together on any such proposition. This hasn't happened to date and there don't appear to be any internal discussions in the pipeline. So, as it stands the NP policy does not have MKCC backing."*

The concerns of MKCC are recognised. However, redevelopment of the library service would only be supported once the library has been relocated and is operational on a site elsewhere in or adjoining the town centre. Also, more broadly, it is again important to recall Policy NP3 does not seek to formally allocate the library site, but rather simply aims to set policy to guide any future application for windfall development.

- **Historic environment** – as discussed, the town centre is a Conservation Area and the sites identified in Policy NP3 (under Option 1) were selected largely on account of them not contributing to the appearance and character of the Conservation Area, and potentially acting as detracting features. Also, policy provision aims to ensure that proposals conserve and enhance the character of the conservation area.

Historic England did not object through the consultation in 2023, but MKCC questioned *"whether some of the properties listed would be suitable for 3 storey development, given the impact that this would have on neighbouring/adjoining listed buildings or non-designated heritage assets."*

The above points are all key considerations and serve to demonstrate that it was reasonable and appropriate to focus attention on Policy NP3 for the purposes of defining, appraising and consulting on reasonable alternatives in 2023.

The final point to note regarding the appraisal table above is that 'moderate or uncertain' positive effects are predicted for both options under several headings. These effects are considered further below as part of the draft plan assessment.

Selecting the preferred option

The plan-makers responded to the assessment as follows:

“As per the conclusion reached in 2023, the preferred approach is Option 1. It is recognised that the assessment finds there to be a preference for Option 2 in certain respects, but in each instance the assessment is quite marginal. Concerns raised by MKCC in respect of the Library Site can be dealt with quite easily, whilst flood risk at 1 Station Road is a matter for detailed consideration through the planning application process. With regards to the historic environment, the Town Council is of the view that Policy NP3 is a ‘positive’.

Assessment findings at this stage

Part 2 of the report presents an assessment of the pre-submission NPNP.

Moderate positive effects are predicted under the **community wellbeing** topic as a result of NPNP policies seeking enhanced accessible, quality green space, active travel routes and the protection/ enhancement of community infrastructure.

Similarly, moderate positive effects are envisaged in relation to **biodiversity** through policies seeking expanded green infrastructure and biodiversity net gain.

The above positive effects largely stem from proposed new Policy NP4 (Green Infrastructure). However, it is important to note that MKCC questioned the evidential basis for green infrastructure designations through the consultation in 2023. The concern could feasibly be that designation leads to land being unduly identified as not suitable for development (‘sterilised’), potentially with implications for community-related objectives, including in respect of meeting housing needs. However, concerns are allayed on account of the new proposal to refer to ‘identifying’ rather than ‘designating’ a green infrastructure network.

Moderate positive effects are also predicted under **transport**. Focusing on modifications only (as opposed to existing policies not proposed for significant modification), the key point to note is a new proposed Local Cycling & Walking Network (Policy NP8). MKCC raised a concern through the consultation in 2023, stating: *“It is not clear from the wording as to what is required from development proposals.”* However, the Town Council has sought to respond to this concern, recognising the importance of the policy not unduly hindering development proposals. The policy now includes greater clarity, as follows:

“Development proposals on land that lies within or adjacent to the Network should sustain, and where practicable enhance the functionality and connectivity of the Network by virtue of their layout and means of access and landscape treatment. Proposals that will harm the functioning or connectivity of the Network will not be supported.”

In terms of **climate change** the NPNP is considered to have moderate positive effects overall, given policies seeking enhanced GI provision which will help reduce the potential flood risk to the Tickford Fields site. Also, policies promoting sustainable travel and the provision of local services are also likely to be helpful in facilitating modal shift, reducing car journeys and associated emissions.

However, it is recognised that one of the sites identified in Policy NP3 is subject to flood risk (a key climate change adaptation issue), as discussed above. Also, the Police Station site, which is an existing allocation under Policy NP1, is subject to flood risk. The site is an existing allocation for 14 homes, but the new proposal is for: *“residential and community use”* to include delivery of *“retirement living and downsizing opportunities as part of the mix of homes.”* Flood risk affecting the site potentially lends a degree of support for flexibility. However, on the other hand, without commitment to delivering a specific number of homes there may be a need to find additional land for housing in order to ensure that housing needs are met.

Finally, with regards to the **historic environment** topic, it is considered that the policy framework set out in the draft NPNP provides a robust framework for the protection and enhancement of the historic environment. However, given the sensitivity of the historic environment to development, effects are neutral overall.

Next steps

This Environmental Report Update accompanies the Submission version of the NPNP and will be published alongside the NDNP under Regulation 16 of the Neighbourhood Planning Regulations.

Representations received will then be taken into account by an appointed Examiner, who will consider whether the NPNP meets with defined Basic Conditions. If the outcome of the Independent Examination is favourable, the NPNP will then be subject to a referendum, and the plan will be ‘made’ if more than 50% of those who vote are in support.

Once made, the NPNP will become part of the Development Plan for Milton Keynes.

Monitoring

The SEA regulations require ‘measures envisaged concerning monitoring’ to be outlined in this report. This refers to the monitoring of likely significant effects of the NPNP to identify any unforeseen effects early and take remedial action as appropriate. Monitoring the effects of the neighbourhood plans is undertaken by the local planning authority as part of the process of preparing its Annual Monitoring Report (AMR). In this instance the SEA has not identified any significant effects which would require closer monitoring.

1. Introduction

Background

- 1.1 AECOM has been commissioned to undertake Strategic Environmental Assessment (SEA) in support of the emerging Newport Pagnell Neighbourhood Plan (NPNP).
- 1.2 The NPNP is currently being prepared under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012, and in the context of Plan:MK; the Local Plan for Milton Keynes.
- 1.3 SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to minimising negative effects and maximising positive effects. SEA of the NPNP is a legal requirement.³

SEA explained

- 1.4 It is a requirement that SEA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.5 In-line with the Regulations, a report (the Environmental Report) must be published for consultation alongside the draft plan that presents an assessment of “*the plan, and reasonable alternatives*”.⁴ The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 1.6 More specifically, the Report must answer the following three questions:
 1. What has plan-making / SEA involved up to this point?
 - including in relation to ‘reasonable alternatives’.
 2. What are the SEA findings at this stage?
 - i.e. in relation to the draft plan.
 3. What happens next?

This Environmental Report Update

- 1.7 This Environmental Report Update accompanies the ‘submission’ version of the NPNP. It updates the Environmental Report published alongside the ‘pre-submission’ version of the NPNP in 2023.
- 1.8 This report answers questions 1, 2 and 3 in turn, to provide the required information. Each question is answered within a discrete ‘part’ of the report.
- 1.9 Before answering Q1, two initial questions are answered to further set the scene: What is the plan seeking to achieve? And what is the scope of the SEA?

³ Regulation 15 of the Neighbourhood Planning Regulations (2012, as amended) requires that each Neighbourhood Plan is submitted to the Local Authority alongside either: A) an environmental report; or, B) a statement of reasons why SEA is not required, prepared following a ‘screening’ process completed in accordance with Regulation 9(1) of the Environmental Assessment of Plans and Programmes Regulations (‘the SEA Regulations’). The NPNP was subject to formal screening in 2022.

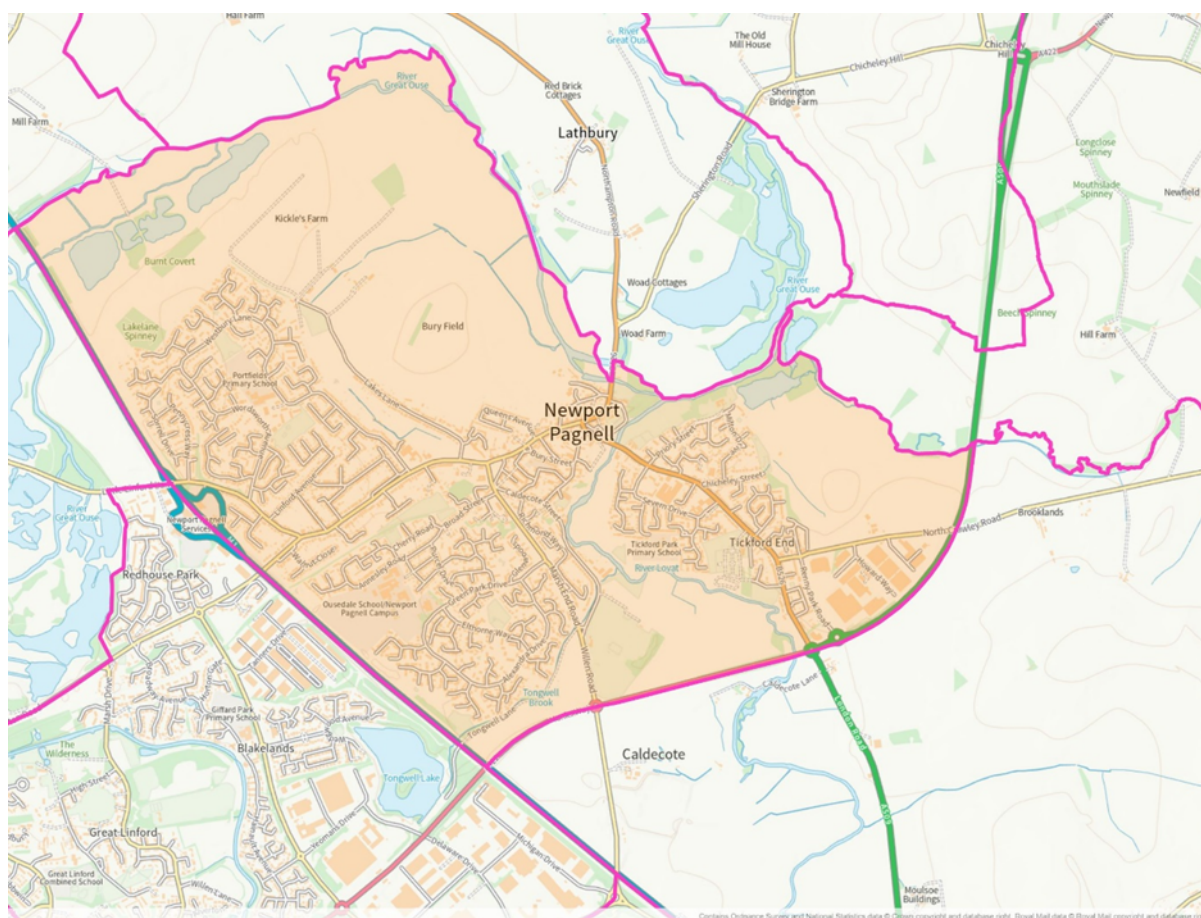
⁴ Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004.

2. What is the plan seeking to achieve?

Introduction

- 2.1 This section considers the strategic planning policy context provided by the adopted Milton Keynes Local Plan; Plan:MK, and then presents the vision and objectives of the NPNP.
- 2.2 **Figure 2.1** below presents the neighbourhood area.

Figure 2.1 The neighbourhood area



Source: Ordinance Survey

Strategic planning policy context

- 2.3 As previously stated, the NPNP has been prepared in the context of the adopted Plan:MK. Milton Keynes City Council is also now in the process of developing a new local plan and recently carried an Ambition and Objectives consultation on its 'New City Plan' to 2050.
- 2.4 Plan:MK identifies Newport Pagnell as a 'Key Settlement'; the second tier of the settlement hierarchy after Milton Keynes City. The other settlements in this tier of the hierarchy are Olney and Woburn Sands'. Appendix A of Plan:MK also lists the following existing allocations (from preceding plans) that are carried forward into Plan:MK:

HS104: Tickford Fields for 930 dwellings

HS105: Police Station Houses, High St. for 14 dwellings

HS106: Network House for 41 dwellings

HS107: Former Aston Martin/ Tesco site for 75 dwellings

HS108: 2 Westbury Lane for 10 dwellings

2.5 Also, it is important to note that Plan:MK Policy SD12 (Milton Keynes Strategic Urban Extension) allocates a large strategic site adjacent to the south eastern boundary of the NP area south of the A422/ A509. This will eventually deliver around 5,400 new homes.

2.6 Finally, Plan:MK Policy DS2 (Housing Strategy) states that ‘small to medium scale development within rural and key settlements, appropriate to the size, function and role of each settlement are to be delivered through allocations in neighbourhood plans’.

Plan vision and objectives

2.7 The NPNP seeks to achieve the Town Council’s vision for the town, which is to:

- Look after Newport Pagnell as a place people want to live, work and visit
- Promote health and wellbeing for Newport Pagnell residents of all ages
- Create a safer and cleaner environment
- Protect and celebrate our local heritage
- Be available for and engaged with the public we represent
- Support activities that encourage residents to feel part of the community

2.8 However, it is important to be clear that the current plan, once made, will be the third iteration of the NPNP, hence the ‘plan-making’ process can alternatively be thought of as a process ‘modifying’ the adopted NPDP (2021).

2.9 The scope of modifications under consideration is fairly limited, as discussed within a Modification Statement published by the Town Council alongside the Pre-submission NPNP in 2023. The statement explains that a key focus is “the future successful role of the town centre in the life of the town” and, to this end, the Pre-submission NPNP (2023) presented a new policy on Living in the Town Centre (Policy NP3). Other new policies in the Pre-submission NPNP (2023) covered the Green and Blue Infrastructure Network (Policy NP4) and Aston Martin Heritage Centre (NP5).

2.10 The current intention is to retain all three of the new policies proposed in 2023, although there is a need to consider some adjustments, particularly in light of comments received from Milton Keynes City Council (MKCC).

3. What is the scope of the SEA?

Introduction

- 3.1 The aim here is to introduce the reader to the scope of the SEA, i.e., the topics and issues / objectives that should be a focus of the assessment (i.e. assessment of “the plan and reasonable alternatives”).

Consultation

- 3.2 The SEA Regulations require that “*when deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies*”. In England, the consultation bodies are the Environment Agency, Historic England, and Natural England. As such, these authorities were consulted in April-May 2023.

The SEA framework

- 3.3 At the core of the SEA scope is ‘framework’ comprising a list of topics and associated objectives, which is in place to guide assessment work.

Table 3.1 SEA framework

SEA topic	SEA objective
Air quality	Improve air quality in the NPNP area and minimise and/or mitigate against all sources of environmental pollution.
Biodiversity	Maintain and enhance the extent and quality of biodiversity and geodiversity habitats and networks within and surrounding the Plan area.
Climate change	Reduce the contribution to climate change made by activities in the Plan area. Support the resilience of the Plan area to the potential effects of climate change, including flood risk.
Community wellbeing	Ensure growth is aligned with the needs of all residents and in suitably connected places, supported by infrastructure to enable cohesive and inclusive communities.
Historic environment	Protect, conserve and enhance the historic environment within and surrounding the Plan area.
Landscape	Protect and enhance the character and quality of the immediate and surrounding landscape, including green infrastructure corridors.
Land, soil, and water	Ensure the efficient and effective use of land Protect and enhance water quality, and use and manage water resources in a sustainable manner
Transportation	Promote sustainable transport and reduce need to travel.

Part 1: What has plan-making / SEA involved to this point?

4. Introduction (to Part 1)

- 4.1 An important element of the required SEA process involves assessing ‘reasonable alternatives’ in time to inform development of the draft proposals, and then publishing information on reasonable alternatives for consultation alongside the draft proposals.
- 4.2 As such, set out below is information on:
- Defining reasonable alternatives
 - Assessing reasonable alternatives
 - Selecting the preferred option

5. Defining reasonable alternatives

- 5.1 The decision taken in 2023, as reported in the Environmental Report published alongside the Pre-submission NPNP, was to focus attention on new proposed **Policy NP3** (Living in the Town), and the same approach is taken in this current Environmental Report Update. The aim of Policy NP3 is to encourage targeted new residential development in the town centre to help bolster its vitality and viability, and also to realise opportunities to improve walking routes. Certain sites are identified – accounting for detailed work in respect of heritage value, given the Conservation Area designation – and criteria to guide future planning applications are proposed.
- 5.2 However, it is important to be clear that the intention of the policy is not to formally ‘allocate’ these sites. Rather, any development that comes forward will be ‘windfall’. The sites in question could all potentially have come forward as windfall in any case, and the effect of the policy is not to significantly alter the potential for development.
- 5.3 In **summary**, the decision was again taken to focus attention on Policy NP3. The reasonable alternatives are also unchanged, namely: **1)** the emerging proposed NPNP; and **2)** progressing the NPNP without Policy NP3.
- 5.4 Briefly, there is also a need to note the decision *not* to define and assess reasonable alternatives (RAs) in respect of either Policy NP1 (Settlement boundary and new housing) or Policy NP2 (Tickford Fields Development Site).
- 5.5 In short, this is because the scope of proposed changes / potential changes to these policies are of limited significance. With regards to **Policy NP1**, there is a question regarding the number of homes supply to expect from the Policy Station Site (it is an existing allocation for 14 homes, but the site is subject to flood risk, hence there is a case for a more flexible approach), but this is considered to be a fairly minor issue, that need not be formally explored via consideration of RAs. Also, there is a proposed change regarding policy support for development of garden land; however, again, the scope of the change is considered to be of limited significance. With regards to **Policy NP2**, the site has planning permission (for ~930 homes), hence there is little to be gained by considering policy options.

6. Assessing reasonable alternatives

6.1 Table 6.1 presents summary findings. With regards to methodology, within each row (i.e. for each element of the SEA framework) the columns to the right-hand side: 1) **rank** the alternatives in order of performance; and 2) **categorise** performance in terms of effects on the baseline (using red, amber and light green and dark green).⁵ Also, '=' is used to denote instances where the alternatives perform on a par.

Table 6.1: Alternatives assessment findings

Topic	Option 1 NPNP approach (includes Policy NP3)	Option 2 Reasonable alternative (deletes Policy NP3)
Air quality	=	=
Biodiversity	=	=
Climate change	2	★1
Community wellbeing	2	★1
Historic environment	2	★1
Landscape	=	=
Land, soil and water resources	=	=
Transportation	=	=

6.2 The first point to make is that alternatives assessment findings are broadly unchanged from those presented in the Environmental Report (2023). It is immediately evident that the appraisal flags a potential preference for Option 2 under three sustainability topic headings, and taking each of these in turn:

- **Climate change** – one of the identified sites, namely 1 Station Road, is subject to flood risk, and it is noted that permission has been refused for development on this site of several occasions in the last 15 months (refs. 21/02388/FUL, 22/02078/FUL and 23/01163/FUL) on flood risk sequential test grounds. An appeal is now pending consideration of the latest refusal.

⁵ **Red** indicates a significant negative effect; **amber** a negative effect that is of limited or uncertain significance; **light green** a positive effect that is of limited or uncertain significance; and **dark green** a significant positive effect. **No colour** indicates broadly neutral effects.

MKCC raised some concerns regarding whether the case for residential development is strong enough, in light of other available site options in the town centre subject to lower flood risk (i.e. sites that are sequentially preferable from a flood risk perspective), to warrant a policy criterion in Policy NP3. The view of the Town Council is that the case is strong enough (such that the site passes the 'sequential test'), assuming that policy criteria are met (N.B. the proposed policy criteria are unchanged from the pre-submission stage).

Regardless, it is important to recall that the proposal is not to allocate the site (such that its development can be assumed and supply of new homes from the site accounted for). Rather, as discussed, the aim is simply to set policy criteria to guide any future planning application, and any future planning application would need to pass the sequential test. Existence of the policy criteria may assist with passing the sequential test, as clearly the effect of the policy is to set out a degree of support for residential development, but the effect of the policy is limited on account of this not being a formal allocation.

- **Community wellbeing** – the key consideration here is identification of the library site within Policy NP3 under Option 1. MKCC questioned this through the consultation in 2023, stating: *“There is no evidence that the library is looking to relocate or that the Town Council’s offices would be an acceptable alternative site. Relocation of the Town Council offices is dependent on redevelopment of the Police Station site, but [this is uncertain]. As stated previously, the Library Service has invested quite heavily in the building and would need to be consulted on any proposals to relocate. Both the Property team and the Library Service would have to work together on any such proposition. This hasn’t happened to date and there don’t appear to be any internal discussions in the pipeline. So, as it stands the NP policy does not have MKCC backing.”*

The concerns of MKCC are recognised. However, redevelopment of the library service would only be supported once the library has been relocated and is operational on a site elsewhere in or adjoining the town centre. Also, more broadly, it is again important to recall Policy NP3 does not seek to formally allocate the library site, but rather simply aims to set policy to guide any future application for windfall development.

- **Historic environment** – as discussed, the town centre is a Conservation Area and the sites identified in Policy NP3 (under Option 1) were selected largely on account of them not contributing to the appearance and character of the Conservation Area, and potentially acting as detracting features. Also, policy provision aims to ensure that proposals conserve and enhance the character of the conservation area.

Historic England did not object through the consultation in 2023, but MKCC questioned “whether some of the properties listed would be suitable for 3 storey development, given the impact that this would have on neighbouring/adjoining listed buildings or non-designated heritage assets.”

- 6.3 The above points are all key considerations and serve to demonstrate that it was reasonable and appropriate to focus attention on Policy NP3 for the purposes of defining, appraising and consulting on reasonable alternatives in 2023.

- 6.4 The final point to note regarding the appraisal table above is that ‘moderate or uncertain’ positive effects are predicted for both options under several headings. These effects are considered further below as part of the draft plan assessment.

7. Selecting the preferred option

- 7.1 The plan-makers responded to the assessment as follows:

“As per the conclusion reached in 2023, the preferred approach is Option 1. It is recognised that the assessment finds there to be a preference for Option 2 in certain respects, but in each instance the assessment is quite marginal. Concerns raised by MKCC in respect of the Library Site can be dealt with quite easily, whilst flood risk at 1 Station Road is a matter for detailed consideration through the planning application process. With regards to the historic environment, the Town Council is of the view that Policy NP3 is a ‘positive’.

Part 2: What are the SEA findings at this stage?

8. Introduction (to Part 2)

8.1 The aim of this chapter is to present an assessment of the NPNP as a whole.

8.2 The NPNP puts forward 9 policies to guide development in the Neighbourhood Plan area. These are set out in Table 8.1 below alongside key objectives.

Table 8.1: NPNP policies and the objectives of each

NP1 – Settlement Boundary and New Housing

- Provision of housing to meet Plan MK targets, together with the necessary infrastructure.
- Housing sited in the most suitable locations.
- Housing that improves movement into and around the town.
- Emphasising the priority given to reusing brownfield land
- Encouraging the delivery of smaller dwellings

NP2 – Tickford Fields Development Site Specific Policy

- Provision of new housing to meet Plan: MK targets, together with the necessary infrastructure
- Housing sited in the most suitable location and developed in a sustainable manner
- Mix of housing, affordable housing, housing to meet resident's needs
- Provision of health/wellbeing facilities, adequate provision of school places
- Improving movement into and around the town, promoting cycling, walking and ease of access for the disabled
- Encouraging development that strengthens sport, recreation, play and culture, and
- Ensuring development enhances the town and maintains the heritage aspects of the town.

NP3 – Living in the Town Centre:

- Encouraging suitable housing development to help secure and improve the vitality and viability of the town centre and conserve and enhance heritage assets
- Creating opportunities to improve walking routes to better connect parts of the town

NP4 – Green and Blue Infrastructure Network:

- Tackling climate and biodiversity change through local positive actions
- Encouraging development that strengthens sport, recreation, play and culture, and that improves movement into and around the town.

NP5 – Aston Martin Heritage Centre:

- To allocate land for the Aston Martin Heritage Centre that is suited to this purpose.

NP6 – Design Guidance:

- Design standards are improved and our local heritage is protected and celebrated.

NP7 – Affordable housing and tenure:

- Provision of mix of housing, affordable housing, and housing to meet resident's needs.

NP8 – Local Cycling & walking Network:

- Improve movement into and across the town, specifically promoting cycling, walking and ease of access for the disabled.

NP9 – Developer Contributions:

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

Methodology

- 8.3 The assessment identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability objectives identified through scoping (see **Table 3.2**) as a methodological framework.
- 8.4 Every effort is made to predict effects accurately; however, this is inherently challenging given the strategic nature of the policies under consideration and understanding of the baseline (now and in the future under a 'no plan' scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g., in relation to plan implementation and aspects of the baseline that might be impacted.
- 8.5 Assumptions are made cautiously and explained within the text (with the aim of striking a balance between comprehensiveness and conciseness). In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is possible to comment on merits (or otherwise) of the plan in more general terms.
- 8.6 Finally, it is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations. So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered, i.e., the potential for the Neighbourhood Plan to impact an aspect of the baseline when implemented alongside other plans, programmes and projects. These effect 'characteristics' are described within the assessment as appropriate.

9. Assessment of the NPNP

Introduction

- 9.1 The assessment is presented below under the SEA framework.

Air quality

- 9.2 The neighbourhood area does not contain Air Quality Management Areas (AQMA). The nearest AQMA is located in Olney approximately 8km from central Newport Pagnell and this is likely to be revoked in the near future.⁶
- 9.3 In terms of localised air quality within the NP area, traffic congestion tends to occur on the High Street during peak times. Similarly, congestion often occurs

⁶ [MK 2022 Air Quality Annual Status Report](#)

around schools at peak times. It is also recognised that there is high level of out-commuting to for example, Milton Keynes, London and the Midlands.

- 9.4 In terms of delivering Newport Pagnell Town Council's (NPTC) vision for the town, specifically to create safer and cleaner environment and to promote health and wellbeing, **Policy NP2** (Tickford Fields Development Site Specific Policy) is relevant. The policy requires Transport Assessments to accompany development schemes within this important strategic site. These must consider cumulative traffic impacts and set out appropriate mitigation measures to address them. This is particularly important given the scale of growth proposed on the site (930 homes) and the adjacent Milton Keynes East scheme (up to 5,400 homes) which will inevitably result in substantial additional traffic. The policy also requires the provision of local facilities and services such as a local centre with a supermarket, a health/ wellbeing facility, bus and cycle routes (Redways) linking to community facilities (school and sports ground). Additionally, development would be required to contribute to sustainable transport initiatives to reach the town centre. The policy is likely to help reduce the need to travel further afield to access community facilities/ services and could encourage cycling and public transport use.
- 9.5 The provision of active travel and green infrastructure can also contribute positively towards air quality, and in this respect, **Policy NP4** (Green Infrastructure Network) is of note as it supports cleaner air through support for a Green Infrastructure Network, a linear park and the promotion of sustainable travel through the NP area and surroundings via foot and cycle.
- 9.6 **Policy NP3** seeks to support the development / redevelopment of certain buildings/ sites within the town centre along the High Street that currently detract from the character and appearance of the Conservation Area. This is to be achieved either through upward extensions of existing buildings (to 3 stories high) or comprehensive redevelopment (e.g. the Library site). The policy also identifies a vacant yard (1 Station Rd.) and builders' yard (Union St.), subject to availability. Whilst these location benefit from being sustainably located in terms of access to the facilities and services within the town centre – they may also lead to increased parking and traffic generation in areas already suffering from congestion at peak times. Therefore mixed effects are potentially likely.
- 9.7 In conclusion, the NPNP policy framework will help contribute positively towards addressing some of the localised congestion issues through policies supporting active travel, enhanced public transport provision, the placing of development within well-connected locations (to services and infrastructure) and provisions for active travel and green infrastructure. However, given the substantial cumulative effects from development proposed at strategic level (e.g. Tickford Fields site and the adjacent MK East Sustainable Urban Extension) NPNP effects are considered to be **neutral** overall.

Biodiversity

- 9.8 There are no internationally or nationally designated biodiversity sites within or adjacent to the neighbourhood area. There are three nationally designated sites (Sites of Special Scientific Interest or SSSIs) within 7-8 km distance from the NA boundary at Stoke Goldington and Weston Underwood to the northwest, and Marston Mortaine to the southeast. The neighbourhood area falls within

the identified Impact Risk Zones (IRZ) for two of these; Salcey Forest and Yardley Chase. However the IRZs does not relate to residential development.

- 9.9 A Habitat Network Expansion Zone extends across the northwest boundary of the neighbourhood area and there is a Network Enhancement Zone to the east of the parish. These Zones are recognised areas close to existing habitats that are either suitable for habitat re-creation, new habitats or restoration that addresses habitat fragmentation. In this context **Policy NP4** is particularly beneficial as it seeks to support a green infrastructure network which overlaps the network enhancement zone 2 to the east of Priory St. around Chicheley Brook and the Network Expansion Zone at the north western boundary of the NP area where the policy designates a Biodiversity Net Gain site intended to act a stepping stone site to reduce habitat fragmentation.
- 9.10 This is supplemented by **Policy NP2** which stipulates that development on the strategic Tickford Fields site ought to minimise loss of existing trees and hedgerows and provide additional planting and include measures to achieve biodiversity net gain (BNG).
- 9.11 In conclusion, the NPNP policy framework performs positively through policies seeking to enhance / expand green infrastructure, mitigate adverse effects on biodiversity sites/ features and seeking BNG, with the potential for residual **moderate positive effects**.

Climate change and flood risk

- 9.12 The climate change SEA objectives focus on reducing the contribution of the neighbourhood area to climate change whilst supporting resilience to the potential effects of climate change, particularly flooding. In practice, development plans can contribute to mitigating the effects of climate change by minimising greenhouse gas emissions from the built environment. Adapting to the effects of climate change includes ensuring development is directed away from areas at greatest risk of flooding and limiting effects of extreme weather.
- 9.13 In terms of adapting to climate change, fluvial flood risk in the neighbourhood area is largely concentrated along Chichely Brook and the River Great Ouse. The former runs along the northern boundary of the Tickford Fields site. Therefore, part of the site is within an identified flood risk area (Flood zone 3). This is further discussed in the MKC's development brief for the site.⁷
- 9.14 The NPNP seeks to address this issue in **Policy NP2** requiring that development proposals should provide a Flood Risk Assessment demonstrating that development is acceptable and providing appropriate mitigation measures. The issue is further addressed in **Policy NP4** which supports a Green Infrastructure Network. The designated GI includes areas adjacent to Chichely brook and is therefore likely to provide beneficial natural flood retention/attenuation helping to reduce the potential flood risk to the rest of the Tickford Fields site. The policy also proposes to extend the existing Linear Park that runs along the north bank of the River Ouzel from the town centre to Downs Field to complete an important, multi-functional green infrastructure link from Riverside Meadow to Ouzel Valley Park.

⁷ [Development Brief: Tickford Fields Estate](#)

- 9.15 With regards to **Policy NP3**, it is recognised that one of the sites identified in Policy NP3 is subject to flood risk (a key climate change adaptation issue), as discussed above. Also, the Police Station site, which is an existing allocation under Policy NP1, is subject to flood risk. The site is an existing allocation for 14 homes, but the new proposal is for: “*residential and community use*” to include delivery of “*retirement living and downsizing opportunities as part of the mix of homes.*” Flood risk affecting the site potentially lends a degree of support for flexibility. However, on the other hand, without commitment to delivering a specific number of homes there may be a need to find additional land for housing in order to ensure that housing needs are met.
- 9.16 Also, some of the sites (west of the High Street) are at high risk of surface water flooding where the change of use to residential will render development more sensitive. That said, policy provisions requiring new development to be safe for its lifetime, without increasing flood risk elsewhere and requiring the use of permeable materials and rainwater harvesting should ensure that significant adverse effects are avoided.
- 9.17 In conclusion, **moderate positive effects** are envisaged due to policies seeking enhanced GI provision and active travel infrastructure and developments that are safe for their lifetimes and do not increase flood risk elsewhere.

Community wellbeing

- 9.18 Suitable housing is an important determinant of health and wellbeing. In this context **Policy NP7** (Affordable Housing and Tenure) is beneficial as it seeks to meet identified local affordable housing need requiring 31% of all homes on major developments to be affordable housing (subject to viability). The policy also includes a 10% allocation for people with strong local connections and 10% shared ownership tenures on the Tickford Fields development which will be particularly helpful for residents who can afford to rent but cannot afford to buy in the market.
- 9.19 **Policy NP3** (Living in the Town Centre) is also beneficial in this respect as it is likely to facilitate the provision of additional housing in an accessible location close to the facilities and services provided by the town centre location. However, on the other hand, there is an outstanding question-mark regarding the library site identified in Policy NP3, as discussed above.
- 9.20 There is growing evidence that green spaces have positive impacts on wellbeing. For example, they have been shown to lower rates of stress, anxiety, and depression, and improve the immune system. Parks and green spaces also help promote physical activity and offer outdoor recreation opportunities. In this context **Policy NP4** (Green Infrastructure Network) is particularly helpful as it seeks to provide a connected green infrastructure network and the expansion of the existing Linear Park for recreational use.
- 9.21 Increased physical activity and minimising time spent sitting down have been shown to help reduce the risk of cardiovascular disease, diabetes, cancer, and depression. In this context **Policy NP8** (Cycling & Walking) is helpful as it seeks to improve / expand the of cycling/ waling network in the NP area thus encouraging active travel.

9.22 However, it is important to note that MKCC questioned the evidential basis for green infrastructure designations through the consultation in 2023, and also questioned whether the policy requirements set out in Policy NP8 are suitably clear. As discussed above, from a ‘communities’ perspective it is important to ensure that the NPDP does not unduly sterilise land for development or hinder the ability of development to come forward. However, and regardless, the latest proposal is to talk more broadly about ‘identifying’ a GI network.

9.23 In conclusion, the NPNP supports developments that enhance accessible, quality green spaces and seeks improvements to active travel routes and the protection/ enhancement of community infrastructure. Therefore the NPNP is considered to give rise to **moderate positive effects**.

Historic environment

9.24 Newport Pagnell has a rich history and is home to numerous heritage assets. The vision of the NPTC seeks to “*Protect and celebrate our local heritage*”.

9.25 In response to this, **Policy NP6** (Design Guidance) supports residential development that does not have detrimental effects on its surroundings and states that “the impact of development will be determined based on protecting heritage assets and their setting”. Proposals within the Conservation Area would be required to demonstrate that they have understood and responded to the character analysis and design guidance contained in the 2010 Newport Pagnell Conservation Area Review and in the 2020 Newport Pagnell Design Study. The policy states that proposals resulting in harm / loss of a Local Heritage Asset (as listed in the Design Study) will not be supported, except where this is (demonstrably) outweighed by the public benefit of development.

9.26 **Policy NP3** supports the provision of residential dwellings in the town centre along the high Street by redeveloping buildings that are not heritage assets and whose appearance may currently detract from the historic character and appearance of the Conservation Area. Development is envisaged as upward extensions (to three stories) and through change of use on two small sites (a construction yard and a social amenity site) to housing. The aim of the policy is to encourage redevelopment of sites that currently detract from the historic character of the Conservation Area. The buildings/ sites identified in the policy generally have styles/ materials that are incongruent with the character of the surrounding Conservation Area and detract from the historical/ architectural character of the location. Therefore, the policy is potentially positive if the redevelopment/ replacement buildings are designed such that they are in keeping character of the Conservation Area (e.g. in terms of style, materials, and size) and contribute positively to the overall setting.

9.27 Ultimately effects will depend on the design of the new developments/ redevelopments. However policy provisions requiring that scheme designs conserve and enhance the character and appearance of the Conservation Area and the setting of designated heritage assets should ensure that significant negative effects are avoided. That said the adopted development plan already establishes the principle of allowing development within the town centre, this is further echoed in Policy NP1. Therefore, effects are considered neutral overall.

9.28 The town has strong associations with the iconic Aston Martin luxury/ sports car manufacturer dating back over 60 years and an even longer association with

bespoke and luxury vehicle making, being the home to Salmons Coachworks since 1830. The NPNP seeks to celebrate this heritage through policy NP5 which allocates land for the Aston Martin Heritage Centre. This is to include a museum and a conference/ education centre. The policy serves to commemorate this important aspect of the town's heritage.

- 9.29 In conclusion, it is considered that the policy framework set out in the draft NPNP provides a robust framework for the protection and enhancement of the historic environment but given the sensitivity of the historic environment to development, effects are considered **neutral** overall.

Landscape

- 9.30 Newport Pagnell lies within the Bedfordshire and Cambridgeshire Claylands National Character Area (NCA)⁸; a broad lowland plateau with shallow river valleys with extensive views of the large-scale arable farmland, the Forest of Marston Vale community forest, and a part of the Chilterns Area of Outstanding Natural Beauty (AONB). The latter falls outside the NP area, around 21km to the southeast. The Milton Keynes Landscape Character Assessment⁹ identifies Newport Pagnell as lying within the Ouse Urban River Valley Landscape Character Area (LCA) comprising River Valley Local Character Type (LCT).
- 9.31 In terms of site allocations the Tickford Fields site is largely greenfield, currently designated as Open Countryside and within an area previously designated as an Area of Attractive Landscape (the designation was subsequently removed in PMK). Therefore, it is important that the layout and design of the development incorporates appropriate landscaping that takes account of the views from the surrounding countryside and integrates well with the surrounding landscape.
- 9.32 In this context **Policy NP2** (Tickford Fields Development Site Specific Policy) is relevant as it requires a master planned approach to the development including a comprehensive landscape strategy (NPNP appendix A) and the retention of hedgerows and trees (as far as possible). It also calls for the layout and the landscaping to take into account views from the surrounding open countryside and to achieve a soft edge to the development.
- 9.33 **Policy NP4** (Green Infrastructure Network) is potentially positive as it identifies a GI network that includes areas of green space, ancient woodland, trees, hedgerows and water bodies; all of which constitute key elements of the town's landscape character. The policy also seeks to extend the existing Linear Park to complete the link between Riverside Meadow and the proposed Ouzel Valley Park extension.
- 9.34 **Policy NP3** (Living in the Town Centre) supports the provision of residential dwellings in the town centre along the High Street by redeveloping buildings that are not heritage assets. The Newport Pagnell Design Study notes that there is a lack of inter-visibility between the Conservation Area and its wider landscape setting.¹⁰

⁸ Natural England (2014) 'NCA Profile: 88 Bedfordshire and Cambridgeshire Claylands (NE555)' can be accessed [here](#).

⁹ Milton Keynes Council (2016) 'Milton Keynes Landscape Character Assessment' can be accessed [here](#).

¹⁰ [Newport Pagnell Design Study](#)

- 9.35 In conclusion, whilst the scale of development proposed at Tickford Fields will substantially and permanently alter the landscape character within the open countryside, the policy framework within the NPNP serves to mitigate some of the effects but given the scale of the site and the cumulative effects expected once MK East SUE is developed, **neutral effects** are considered likely overall.

Land, soil and water resources

- 9.36 Several brownfield sites have already been developed in the NP area under previous iterations of the NPNP (North Crawley Rd Industrial Estate, Aston Martin Works and Union St. Mustard Factory). **Policy NP1** continues the focus on brownfield sites by promoting the reuse of previously developed land within the Settlement Boundary, and includes a new focus on garden land. Similarly, **Policy NP3** also seeks residential development on brownfield/ previously developed land within the town centre along the High Street.
- 9.37 Development on the Tickford Fields site will lead to the loss of some greenfield land the loss of land and soil resources. However, it is recognised that this a strategic level allocation and reflects a lack of alternative wholly brownfield sites available in the town, rather than inefficient land use.
- 9.38 Detailed information about soil quality in the neighbourhood area is unknown at this stage. However, indicative data suggests that parts of the neighbourhood area, including Tickford Fields, have a high likelihood of being underlain by best and most versatile (BMV) agricultural land (> 60% area)¹¹. Therefore, development of this site is likely to result in the loss of some productive agricultural land, leading to minor long-term negative effects.
- 9.39 Support for biodiversity and green spaces, including the local green and blue infrastructure network, through the NPNP will likely lead to improvements in the quality of land, soil and water resources through the promotion of natural processes that support these resources. Relevant policies in this regard include **Policy NP4** (Green Infrastructure Network) and **Policy NP6** (High Quality, Locally Distinctive Design).
- 9.40 Any issues surrounding water resources, including wastewater treatment, will be a matter for Anglian Water Services. The Water Resources Management Plan (2019) sets out how Anglian Water will balance water supply and demand to 2045, ensuring adequate supply to homes whilst also protecting the environment¹². This is supported through **Policy NP3** which includes a requirement for rainwater harvesting and **Policy NP5** which seeks to protect the River Ouzel from the effects of surface water run-off from the proposed Aston Martin Heritage Centre.
- 9.41 In conclusion, strategic level development such as at Tickford Fields are likely to lead to the loss of some BMV agriculture land. Whilst NPNP policies seeking to maximise the reuse of brownfield land are beneficial they are unlikely to make a significant impact on the area of BVM land lost through strategic level allocations. Therefore, **neutral effects** are predicted.

¹¹ Natural England (2017): 'Likelihood of Best and Most Versatile (BMV) Agricultural Land – Strategic scale map London and South East Region (ALC018)', [online] available to access via [this link](#)

¹² Anglian Water (2019): 'Water Resources Management Plan', [online] available to access via [this link](#)

Transportation

- 9.42 Newport Pagnell is a relatively well-connected town in terms of access to the highway network (M1, A509, A422) but less well served by public transport. There is no railway station within the NP area with the nearest passenger railway service provided by Wolverton railway station around 3.5 miles away. Inter-city services are accessible from Milton Keynes Central (4 miles away). The town is served by around 10 bus services with frequent services on weekdays between 8 am and 6 pm but lower levels of service at weekends.
- 9.43 In relation to the above, **Policy NP2** requires the provision of a secure bus service to serve the Tickford Fields development and for all new dwellings to be within 400 meters of a bus stop. It also seeks the provision of cycle routes/ Redways linking to neighbouring areas and the wider Redways network. It also seeks the provision of community facilities such as schools and a local centre including a supermarket which will help reduce the need to travel further afield to access such services.
- 9.44 Additionally proposals will require a Transport Assessment to demonstrate the traffic impact on the surrounding highway network, and propose any mitigation measures needed.
- 9.45 The NPNP area has a number of Public Rights of Way (PRoW) that allow for safe, active travel opportunities within and outside of the neighbourhood area. Redways (traffic free shared-use cycling/ walking paths) connect the southern half of the parish with Milton Keynes. A NPTC survey of the network identified several weaknesses in the current provision including lack of directional signage, absence of linkages with principal destinations and lack of separate cycle provision. In this context **Policy NP8** is beneficial as it requires new development to sustain and enhance the functionality of the cycle/ footpath network through their design and landscape treatment. It also stipulates that major developments should be planned with integrated cycle and pedestrian routes that link with and expand the existing network providing access to the town centre, schools and sports facilities.
- 9.46 In conclusion, the NPNP policy framework supports connected places and active travel uptake through setting out measures to improve and enhance sustainable transport provision. It also seeks to address congestion issues and capitalise upon existing cycle / pedestrian network and bus services, with the potential for positive effects. However, given the scale of strategic level growth proposed at Tickford Fields and the adjacent strategic urban extension (MK East SUE), a **moderate positive effect** is predicted overall.

10. Conclusion on the draft NPNP

- 10.1 Moderate positive effects are predicted under the community wellbeing topic as a result of NPNP policies seeking enhanced accessible, quality green space, active travel routes and the protection/ enhancement of community infrastructure.

- 10.2 Similarly, moderate positive effects are envisaged in relation to biodiversity through policies seeking expanded green infrastructure and biodiversity net gain.
- 10.3 The above positive effects largely stem from proposed new Policy NP4 (Green Infrastructure). However, it is important to note that MKCC questioned the evidential basis for green infrastructure designations through the consultation in 2023. The concern could feasibly be that designation leads to land being unduly identified as not suitable for development ('sterilised'), potentially with implications for community-related objectives, including in respect of meeting housing needs. However, concerns are allayed on account of the new proposal to refer to 'identifying' rather than 'designating' a green infrastructure network.
- 10.4 Moderate positive effects are also predicted under transport. Focusing on modifications only (as opposed to existing policies not proposed for significant modification), the key point to note is a new proposed Local Cycling & Walking Network (Policy NP8). MKCC raised a concern through the consultation in 2023, stating: "It is not clear from the wording as to what is required from development proposals." However, the Town Council has sought to respond to this concern, recognising the importance of the policy not unduly hindering development proposals. The policy now includes greater clarity, as follows:
- "Development proposals on land that lies within or adjacent to the Network should sustain, and where practicable enhance the functionality and connectivity of the Network by virtue of their layout and means of access and landscape treatment. Proposals that will harm the functioning or connectivity of the Network will not be supported."*
- 10.5 In terms of climate change the NPNP is considered to have moderate positive effects overall, given policies seeking enhanced GI provision which will help reduce the potential flood risk to the Tickford Fields site. Also, policies promoting sustainable travel and the provision of local services are also likely to be helpful in facilitating modal shift, reducing car journeys and associated emissions.
- 10.6 However, it is recognised that one of the sites identified in Policy NP3 is subject to flood risk (a key climate change adaptation issue), as discussed above. Also, the Police Station site, which is an existing allocation under Policy NP1, is subject to flood risk. The site is an existing allocation for 14 homes, but the new proposal is for: "residential and community use" to include delivery of "retirement living and downsizing opportunities as part of the mix of homes." Flood risk affecting the site potentially lends a degree of support for flexibility. However, on the other hand, without commitment to delivering a specific number of homes there may be a need to find additional land for housing in order to ensure that housing needs are met.
- 10.7 Finally, with regards to the historic environment topic, it is considered that the policy framework set out in the draft NPNP provides a robust framework for the protection and enhancement of the historic environment. However, given the sensitivity of the historic environment to development, effects are neutral overall.

Part 3: What are the next steps?

11. Plan finalisation

- 11.1 This Environmental Report Update accompanies the Submission version of the NPNP and will be published alongside the NDNP under Regulation 16 of the Neighbourhood Planning Regulations.
- 11.2 Representations received will then be taken into account by an appointed Examiner, who will consider whether the NPNP meets with defined Basic Conditions. If the outcome of the Independent Examination is favourable, the NPNP will then be subject to a referendum, and the plan will be 'made' if more than 50% of those who vote are in support.
- 11.3 Once made, the NPNP will become part of the Development Plan for Milton Keynes.

12. Monitoring

- 12.1 The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report. This refers to the monitoring of likely significant effects of the NPNP to identify any unforeseen effects early and take remedial action as appropriate.
- 12.2 It is anticipated that monitoring of effects of the NPNP will be undertaken by Milton Keynes Council as part of the process of preparing its Annual Monitoring Report (AMR).
- 12.3 The SEA has not identified any significant effects for the NPNP which would require closer monitoring.

Appendix I: Regulatory requirements

As discussed in **Chapter 1** above, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 (the Regulations) explains the information that must be contained in the Environmental Report; however, interpretation of Schedule 2 is not straightforward. **Table AA.1** overleaf links the structure of this report to an interpretation of Schedule 2 requirements, whilst **Table AA.2** explains this interpretation. **Table AA.3** identifies how and where within the Environmental Report the regulatory requirements have/ will be met.

Table AA.1 Questions answered by this Environmental Report, in-line with an interpretation of regulatory requirements

Environmental Report question	In line with the SEA Regulations, the report must include... ¹³
What is the plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents and main objectives of the plan.
What is the sustainability 'context'?	<ul style="list-style-type: none"> Relationship with other relevant plans and programmes. The relevant environmental protection objectives established at international or national level. Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.
What's the scope of the SEA?	<ul style="list-style-type: none"> The 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 is the sustainability 'baseline'?	<ul style="list-style-type: none"> The 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?	<ul style="list-style-type: none"> Key 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?	<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with. The likely significant effects associated with alternatives. Outline reasons for selecting the preferred approach in-light of alternatives appraisal/a description of how environmental objectives and considerations are reflected in the current version of the plan.
What are the assessment findings at this stage?	<ul style="list-style-type: none"> The likely significant effects associated with the pre submission version of the plan. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the pre-submission version of the plan.
What happens next?	<ul style="list-style-type: none"> The next steps for the plan making /SEA process.

¹³ NB this column does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation.

Table AA.2 ‘Checklist’ of how (throughout the SA process) and where (within this report) regulatory requirements have been, are and will be met.

Regulatory requirement	Discussion of how requirement is met
Schedule 2 of the regulations lists the information to be provided within the SA Report	
1. An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Chapter 2 (‘What is the plan seeking to achieve’) presents this information.
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters have been considered in detail through scoping work, which has involved dedicated consultation on a Scoping Report. The ‘SEA framework’ – the outcome of scoping – is presented within Chapter 3 (‘What is the scope of the SEA?’).
3. The environmental characteristics of areas likely to be significantly affected;	
4. Any existing environmental problems which are relevant to the plan or programme including those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.;	
5. The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been considered during its preparation;	The SEA framework is presented within Chapter 3 (‘What is the scope of the SEA’).
6. The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	Chapter 6 presents alternatives appraisal findings. Chapters 9 presents an appraisal of the plan. With regards to assessment methodology, Chapter 8 explains the role of the SEA framework/scope, and the need to consider the potential for various effect characteristics/ dimensions, e.g., timescale.
7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	The assessment highlights certain tensions between competing objectives, which might potentially be addressed when finalising the plan.
8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Chapters 5 deals with ‘Reasons for selecting the alternatives dealt with’, in that there is an explanation of the reasons for focusing on particular issues and options. Also, Chapter 7 explains the Town Council’s ‘reasons for selecting the preferred option’ (in-light of alternatives assessment).
9. Description of measures envisaged concerning monitoring in accordance with Art. 10;	Chapter 11 presents measures envisaged concerning monitoring.
10. A non-technical summary of the information provided under the above headings	The NTS is provided at the beginning of this Environmental Report.

The SA Report must be published alongside the Draft Plan, in accordance with the following regulations

authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the Draft Plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)

This report is published alongside the draft plan.

The SA must be considered, alongside consultation responses, when finalising the plan.

The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.

This report will inform plan finalisation.

