

Sustainability Appraisal (SA) of the MK City Plan 2050

SA Report

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Quality information

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Non-technical summary

This is the SA Report published alongside the proposed submission version of the Milton Keynes (MK) City Plan 2050. Within this report:

- Part 1 – explains work to explore reasonable alternatives.
- Part 2 – presents an appraisal of the plan as a whole.
- Part 3 – discusses next steps.

Focusing on Part 1, this presents an appraisal of five reasonable alternative ‘growth scenarios’ defined as essentially alternative key diagrams, i.e. alternative approaches to the supply of land to provide for development needs alongside delivering on wider plan objectives.

Specifically, after having given consideration to strategic factors (including Local Housing Need, LHN) and site options, six growth scenarios were defined for appraisal, which are presented in summary below with reference to the preferred option (PO):

1. The PO **minus** South Bow Brickhill, Levante Gate and Shenley Dens
2. The PO **minus** East Wavendon
3. The PO **minus** S. Bow Brickhill, Levante Gate and Shenley Dens **plus** West Olney
4. The PO **minus** East Wavendon **plus** West Olney
5. The preferred option (**PO**)
6. The PO **plus** West Olney

Table A presents a summary of the growth scenarios appraisal, with a column for each of the scenarios and a row for each element of the SA framework, which comprises a list of sustainability topics and associated objectives. Within each row, the aim is to **1**) rank the scenarios in order of performance (with a star indicating best performing and “=” used where it is not possible to differentiate with confidence); and then **2**) categorise performance in terms of significant effects using **red** (significant negative) / **amber** (moderate or uncertain negative) / **light green** (moderate or uncertain positive) / **green** (significant positive) / **no colour** (neutral).

The appraisal shows a mixed picture, but it is immediately apparent that **Scenario 2** *potentially* performs poorly overall, as indicated by the fact that it is predicted to have equal fewest positive effects and equal most negative effects. East of Wavendon is a logical location for growth, most notably in transport terms including noting the possibility of future growth in Central Bedfordshire (subject to their own plan-making), but there are delivery challenges and uncertainties. The situation has improved (e.g. since the time of preparing Plan:MK, when the land was being promoted in a piecemeal fashion), but the remaining challenges / uncertainties mean that growth is not anticipated until post 2038.

It can also be noted that **Scenario 6** is the preferable scenario under the greatest number of topics (three), which is an indication of merit although, and to reiterate, it does not necessarily follow that it is best performing / best represents sustainable development. There is support for Scenario 6 as a higher growth scenario that would allow for a large ‘supply buffer’ and/or a modest boost to the housing requirement, and there is support for a bypass at Olney in several respects, but deliverability is uncertain.

Finally, with regards to **Scenario 1**, it is important to be clear that whilst the appraisal does not predict a negative effect under the ‘housing heading’, because total housing supply would still be above local housing need (LHN), this is marginal, because all three of the sites omitted from this scenario are of considerable importance, specifically: Levante Gate can deliver early (which is a key consideration, given the need to demonstrate a five year housing land supply at the point of adoption and then maintain this over the early years of the plan period ahead of a local plan review); Shenley Dens can deliver Gypsy and Traveller pitches (again, this is a key consideration as otherwise there would be a clear concern regarding providing for needs); and all three of the sites have strong development viability such they are well placed to deliver the full policy quota of affordable housing alongside delivering on wider policy asks.

Table A: The reasonable growth scenarios – summary appraisal findings

	1) PO minus S. Bow Brickhill, L. Gate, S. Dens	2) PO minus E. Wavendon	3) PO minus S. Bow Brickhill, L. Gate, S. Dens plus W. Olney	4) PO minus E. Wavendon plus W. Olney	5) Preferred option (PO)	6) PO plus W. Olney
Accessibility	3	3	3	3	★1	2
Air / env quality	3	4	2	2	2	★1
Biodiversity	=	=	=	=	=	=
CC adaptation	=	=	=	=	=	=
CC mitigation	=	=	=	=	=	=
Communities and health	★1	★1	★1	★1	2	2
Economy & employment	=	=	=	=	=	=
Historic env	4	2	3	★1	4	3
Homes	6	5	4	3	2	★1
Landscape	★1	3	2	3	3	3
Resources	=	=	=	=	=	=
Transport	2	3	2	3	★1	2
Water	=	=	=	=	=	=

The following text was prepared by MKC officers in response to the appraisal above, confirming that Scenario 5 is the preferred option/approach:

The preferred approach is **Scenario 5**, which is considered to be justified, i.e. an appropriate strategy on the basis of proportionate evidence including the evidence provided by the appraisal of RA growth scenarios presented above.

Scenario 5 is shown to broadly perform well through the appraisal, striking a balance between boosting housing supply and responding to constraints and delivery risks. Scenario 5 is shown to be best performing with regard to ‘accessibility’ and ‘transport’, which are instrumental to responding to climate change through land use and creating people-friendly healthy places, and so considerable weight is given to these topics.

The appraisal of Scenario 5 highlights challenges and drawbacks, both in absolute terms and relative to alternatives, and these are all acknowledged and accepted, but Scenario 5 is considered to represent sustainable development on balance.

Scenario 6 is clearly shown by the appraisal to have a good degree of merit, and the broad case for remaining open to higher growth scenarios is acknowledged. However, there are deliverability uncertainties in respect of West of Olney (primarily infrastructure) and growth here would not align well with the vision-led transport strategy. Even if a bypass could be delivered for Olney, it would be challenging for this relatively modest scale of growth to deliver the wider necessary infrastructure, including a new secondary school and health provision

The landscape and/or historic environment case for lower growth scenarios is also acknowledged, but all of the sites in question (South of Bow Brickhill, Levante Gate, Shenley Dens, East of Wavendon) have considerable merit when viewed in isolation and as part of an overall strategy. The following statement from the Interim SA Report (2024) still holds true: *“Taken with the positive effects of these options, and on balance with other considerations, they represent sustainable options for growth...”*

With regards to Part 2, the conclusion reached on the plan as a whole is as follows:

The conclusion of the ‘whole plan’ appraisal is as per the conclusion reached for Scenario 5 in Part 1. On balance it is not considered appropriate to ‘boost’ any of the appraisal conclusions reached for Scenario 5 on account of DM policies.

Specifically, the appraisal concludes: a significant **positive effect** under one heading (homes); a ‘moderate or uncertain’ **positive effect** under two headings (accessibility and economy); a neutral effect under six headings; and a ‘moderate or uncertain’ **negative effects** under four headings (climate change adaptation, historic environment, landscape and transport). No significant negate effects are predicted.

There will be the potential to make adjustments to the plan through the examination in public in order to improve the performance of the plan, albeit the remit/role of the Planning Inspector(s) will be limited. The appraisal highlights a number of specific matters that might be given further consideration; however, it is difficult to make specific recommendations, because any recommendation made with a view to improving the performance of the plan under one sustainability topic heading could have knock-on implications for performance under another heading. For example, it would be easy to recommend more stringent requirements in respect of affordable housing within the urban area, but there would be implications for wider objectives with cost implications.

Focusing on DM policy, moving forward it will be important to consider policy requirements in the round where they are associated with a cost for developers, with a view to striking the right balance between policy priorities (e.g. affordable housing versus infrastructure versus wider policy asks) in the context of development viability. It is important to be clear what is being prioritised and what compromises are being made / trade-offs accepted with a view to a ‘whole plan’ with good viability credentials and, in turn, minimal delivery risk (albeit delivery risk is reduced by a healthy supply buffer).

Finally, as part of SA there is a requirement to consider ‘cumulative effects’, i.e. the effects of a local plan in combination with other local plans and other strategies. This has already been a focus of considerable discussion above, particularly the matter of close collaboration with Central Bedfordshire, Bedfordshire and Buckinghamshire.

This is both in terms of: A) detailed cross-border considerations, perhaps most notably in respect of ESCE; and B) broad strategy relating to housing, employment land, strategic transport, water resources and green and blue infrastructure (e.g. a ‘Waterways Park’ to Bedfordshire and/or a Calverton Valley Park). In respect of (B), one key matter for ongoing consideration is planning for strategic warehousing / distribution.

Planning to 2050 means that careful consideration must be given to not foreclosing or hindering future consideration of growth options in response evolving evidence and understanding. However, overall the MK City Plan 2050 is considered to represent a highly proactive approach to plan-making within a key nationally significant sub-region.

Finally, Part 3 discusses next steps, with the key next step set to be an examination in public.

1. Introduction

1.1. Background

- 1.1.1. AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Milton Keynes City Plan 2050 being prepared by Milton Keynes City Council.
- 1.1.2. Once adopted, the City Plan will set a strategy for growth and change up to 2050, allocate sites to deliver the strategy and establish policies against which planning applications will be determined.
- 1.1.3. SA is a process for considering and communicating the effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives.¹

1.2. SA explained

- 1.2.1. It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes (SEA) Regulations 2004.
- 1.2.2. In-line with the Regulations, a report (known as the **SA Report**) must be published for consultation alongside the draft plan that presents an appraisal of “the plan and reasonable alternatives” with a particular focus on appraising “significant effects”.
- 1.2.3. More specifically, the SA Report must:
 - explain **work to date** and, in particular, appraisal of ‘reasonable alternatives’;
 - present **an appraisal of current proposals**, i.e. the Draft Plan; and
 - explain **next steps**.
- 1.2.4. The report must then be taken into account, alongside consultation responses, when finalising the plan.

1.3. This SA Report

- 1.3.1. The current consultation is on the final draft (‘proposed submission’) version of the City Plan 2050. It is held under Regulation 19 of the Local Planning Regulations and follows a consultation in 2024 on an early draft version of the plan under Regulation 18.
- 1.3.2. As such, this is the formal SA Report and supersedes the previous report from 2024.

Structure of this report

- 1.3.3. This SA Report is structured in **three parts** covering “work to date”, “an appraisal of the current proposals” and “next steps”.
- 1.3.4. Ahead of Part 1, there is a need for two further introductory sections:
 - Section 2 – introduces the plan scope.
 - Section 3 – introduces the SA scope.

¹ Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2024). The Town and Country Planning (Local Planning) Regulations 2012 require that an SA Report is published for consultation alongside the ‘Proposed Submission’ plan document.

2. The plan scope

2.1. Introduction

- 2.1.1. The aim here is to briefly introduce the context to plan preparation, including the national context of planning reform; the plan area (ahead of more detailed discussion below); the plan period; and the objectives that are in place to guide plan preparation.

2.2. Context to plan preparation

- 2.2.1. The MK City Plan 2050 will form the 'local plan' for the Milton Keynes City Council area and will replace the adopted local plan known as Plan:MK. Plan-making has been underway since 2023 and with some urgency because Plan:MK dates from 2019 and looks ahead only to 2031, whilst the NPPF expects local plans to be reviewed every five years and look ahead 15 years, including in terms of identifying a supply of land sufficient to meet development needs, notably in respect of housing and employment.

- 2.2.2. There is also urgency in light of Plan:MK Policy DS0 (Review of Plan:MK), which states:

"The Council commits to undertaking an early review of Plan:MK... containing strategic policies for the long-term growth of Milton Keynes [with submission by] December 2022.

Following the completion of the Joint Strategic Growth Study and adoption of the Council's Strategy for 2050 in 2019, the review of Plan:MK will bring the delivery of the long-term aspirations for transformational growth into... statutory planning policy...

... within the context of a potential growth deal as well as progress on the delivery of the Government's wider Cambridge - Milton Keynes - Oxford Corridor growth agenda, including associated national infrastructure projects and a corridor-wide [vision]. The review will also develop and formalise, as appropriate, joint working arrangements with neighbouring authorities which may result in the preparation of a joint strategic plan..."

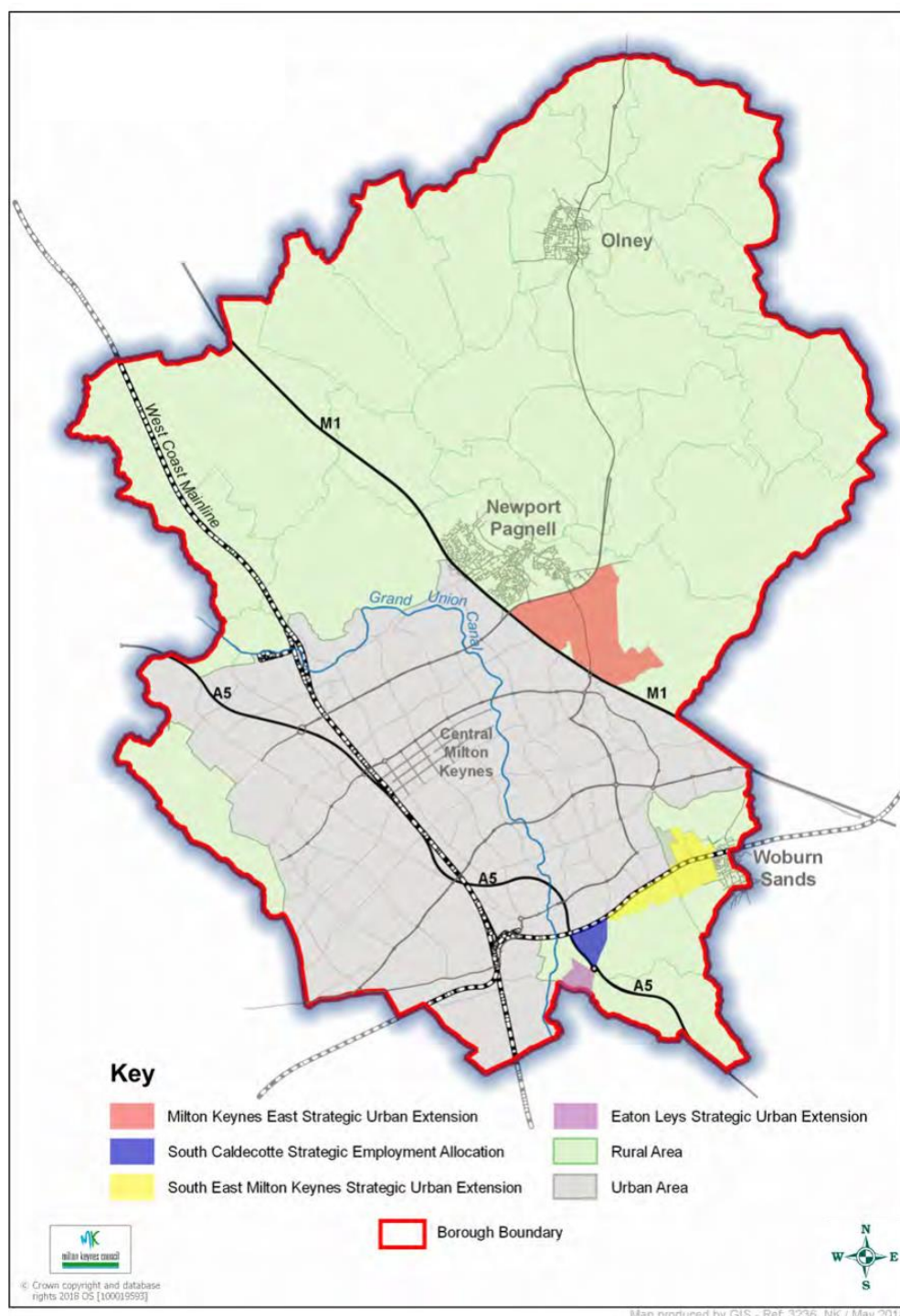
- 2.2.3. The context to this commitment subsequently changed significantly, including due to a series of changes in respect of "the Government's wider Cambridge - Milton Keynes - Oxford Corridor growth agenda" but it does remain the case that there is an urgent need to adopt the MK City Plan to reflect "long-term aspirations for transformational growth."
- 2.2.4. In particular, a key aim of the MK City Plan is to take forward the Milton Keynes Strategy for 2050, which sets out the Council's ambition for growth to 2050 but is not a statutory planning policy document. The 'Strategy 2050' was itself prepared in line with the MK Futures 2050 Commission which reported in 2016 and, amongst other things, explained education and mobility as two key priorities looking ahead to 2050.
- 2.2.5. A headline target within Strategy 2050 is to reach a population of 410,000 by 2050, which means delivering new homes at a rate of around 2,250 dwellings per annum (dpa). This compares to housing need of 1,799 dpa, as understood on the basis of the Government's standard method, and recent delivery averaging 2,366 dpa (2022-24).
- 2.2.6. In this light, a key decision for the MK City Plan is in respect of the 'housing requirement', which is the number of homes that the Council commits to delivering annually over the plan period and in the knowledge that under-delivery risks punitive measures, namely 'the presumption in favour of sustainable development (NPPF para. 11). 'The presumption' is not currently an issue for the Council, unlike for many other areas nationally, but could become an issue without a new Local Plan, such that it becomes more difficult to defend against planning applications ('planning by appeal').
- 2.2.7. Specifically, without an up-to-date local plan the housing requirement is taken from the Government's standard method (1,799 dpa), and whilst Milton Keynes is currently able to demonstrate a 'five year housing land supply' as measured against this requirement, that situation may not be sustainable. This means that there is a need for a boost to supply and clearly the best way to do so is via a new local plan, as opposed to via ad hoc piecemeal planning applications.

- 2.2.8. The situation is also similar in respect of providing for employment land, which is a centrally important issue for the City Plan, recognising that Milton Keynes is an economic powerhouse, indeed the largest economy in the south of England and Wales outside of London. There are aspirational growth figures for jobs and employment land / floorspace that must be considered, but it is also important to commit to a level of growth that is deliverable, including recognising the uncertainties around economic forecasting. Whilst, in the case of employment land, there is no equivalent of the presumption in favour of sustainable development, under-delivery can still lead to issues.
- 2.2.9. So far this discussion has covered: the national policy context in respect of ensuring up-to-date local plans; the sub-regional context in respect of delivering long-term aspirational growth; and the importance of balancing aspiration with delivery so as to avoid the presumption in favour of sustainable development set out at NPPF para 11.
- 2.2.10. Finally, and on a positive note, there are many benefits to be realised through coordinated growth, regardless of the potential issues that can arise from uncoordinated growth in the absence of an up-to-date Local Plan. For example:
- Plan-led growth creates an opportunity to target investment to realise infrastructure and wider community and environmental benefits far in excess of what would otherwise be the case, i.e. what can be achieved via more piecemeal growth.
 - Similarly, coordinated growth can deliver on regeneration objectives and, in practice, coordinated growth to deliver city centre regeneration is a key aim of the City Plan.
 - Finally, a local plan is an opportunity to consider development viability in a strategic way, such that a considered approach can be taken to policy 'asks' including housing mix, affordable housing, net zero development, biodiversity net gain and more.

2.3. The plan area

- 2.3.1. Milton Keynes City Council's area covers the city of Milton Keynes in the south and then a rural area in the north (more than 50% of the total area) that includes the town of Olney and a series of villages. Moving forward within this report, reference is made to "the city council area" and "Milton Keynes" meaning the city of Milton Keynes.
- 2.3.2. Newport Pagnell at the northeast edge of Milton Keynes is a distinct historic town but is physically joined to Milton Keynes, particularly once account is taken of a committed strategic urban extension to the south that was allocated through Plan:MK (2019), namely Milton Keynes East. The current proposal is to adjust the settlement hierarchy such that Newport Pagnell is taken as forming part of Milton Keynes.
- 2.3.3. Similarly, Woburn Sands is a distinct historic village in the southeast of the city council area but is set to become physically linked by another Plan:MK strategic allocation, such that the proposal now is to treat it as part of Milton Keynes for planning purposes.
- 2.3.4. The Plan:MK key diagram (2019) is shown below, with a view to introducing the plan area. As well as key settlements and committed strategic urban extensions it shows a number of other features including Central Milton Keynes (CMK). One additional feature not shown but noteworthy is the River Great Ouse, which is a major river and one that acts to contain the northern extent of Milton Keynes / Newport Pagnell.

Figure 2.1: The adopted Plan:MK key diagram (2019)



2.3.5. Focusing on Milton Keynes itself, introducing key broad strategy considerations is no easy task because the city is unique in many ways, but drawing upon MK Strategy 2050:

- **New town heritage** – MK is the largest designed city in Europe, internationally known for its modern heritage. CMK is at the heart, and then individual grid square estates are complemented by subsumed older towns and villages.
- **Economy** – MK is at the crossroads between London, Birmingham, Oxford and Cambridge and is the largest economy south of Birmingham. The city is well-linked by road and rail, and this will improve following East West Rail and increased capacity as a result of HS2. MK is one of the most productive UK cities and there are around 191,000 jobs with strengths including knowledge intensive business sectors – for example engineering and technology – and the logistics and distribution sector.

- **Population** – since the early 1950s, MK has been popular with families moving from London, first to ‘Bigger, Better, Brighter Bletchley’ and then to ‘Milton Keynes: City of Trees’. More recently, Milton Keynes has been the country’s fastest growing city and the original 1970 ambition for a population of 250,000 people has now been exceeded. The committed growth through Plan:MK will see the population grow to 340,000, and in 2017 a National Infrastructure Commission (NIC) study suggested that MK could be re-established as *“a development location of national significance, through the intensification and expansion of the town to a population of at least 500,000”*.

- **Strategy** – growth does not guarantee success and so MK Strategy 2050 sets out to *“strengthen what works well and make sure every resident in every part of Milton Keynes can benefit from our prosperity.”* It goes on to say:

“This includes making available the infrastructure and services such as transport, health, social care, schools, shops, leisure, sports and cultural facilities that are essential for our existing and new communities. By planning this upfront we can make the case for investments that will serve us well into the future, rather than reacting as pressures arise. Knowing how big our city is likely to be long-term has recently helped Milton Keynes University Hospital to make the case for investment from government...”

... Milton Keynes is a living example of how well-planned growth can produce better lives and better places. We will continue to provide city-wide green space alongside other essential infrastructure and services and make sure we join up our approach so that development does not put pressure on our communities and environment... For example, as our economy grows, we will ensure our residents have the education and skills to access the new jobs and provide affordable homes for our expanding workforce. This will help to address poverty and reduce pressure on house prices and the need for in-commuting, which in turn will reduce carbon emissions.”

- **Transport** – MK’s grid roads and Redways leads to an ability to move around with ease by car, bike, micro-mobility and by foot. However, the public transport system requires major improvement aimed at delivering on a range of objectives, e.g. health, the economy and decarbonisation. One central aspect of the strategy, as set out in MK Strategy 2050, is adapting grid road corridors so that they are suitable for Mass Rapid Transit (MRT) vehicles as well as cars (including driverless) and bikes. With regards to the Redway network, this extends to 320km but requires improvement including to support commuting. The current plan document further explains:

“The success of the grid road network is well recognised in keeping vehicle traffic moving. However, it has largely been extended to its outward limits given the barriers created by the East-West Rail Line and Green Sands Ridge to the south, the city boundary to the west, the River Great Ouse to the north, and the M1 to the east. While some extension of the grid roads will occur into new strategic allocations, these will be designed in a way to acknowledge and reconcile both the original principles of grid roads and the context within which they would be located and function, in accordance with [an established] movement hierarchy... A primary focus of the MK City Plan 2050 is to minimise the need for travel by car by promoting active travel and public transit... To that end, [policy] defines expectations for the delivery of movement and access corridors, that prioritise active travel and public transit that is accessible to all.”

- **Greater Milton Keynes** – might describe areas within neighbouring local authorities that link closely to Milton Keynes. This is notably the case for parts of Buckinghamshire (there are two committed strategic urban extensions into Buckinghamshire) and Bedfordshire (given strong transport connectivity including via forthcoming East West Rail Stage 2) but there are also key links to Northamptonshire.
- **CMK** – as planned more than fifty years ago, Central Milton Keynes (CMK) is the heart of the city. It is the most popular shopping destination in the region and the primary office location between London and Birmingham. There is no room for complacency, but by 2050 the vision is for CMK to serve many millions of people within a 45-minute journey. It is currently home to around a quarter of total jobs and the vision is for a further 18,000 jobs by 2050, plus the hope is that thousands of students will study in CMK every day. Very few people currently live in CMK, but there are now thousands of homes planned, and MK Strategy 2050 proposes to greatly accelerate this shift.

There is much to celebrate about the modernist design of CMK, but some elements create challenges. The network of step-free paths and covering structures provides an accessible environment, but wide boulevards and rows of parking in front of low density buildings affects vibrancy. Some land is vacant, or has never been built on, and there are vacant or under-used buildings ripe for refurbishment or redevelopment.

- **Central Bletchley** – is also poised for major regeneration capitalising on a location at the intersection of East West Rail and the West Coast Mainline. The original vision for a Bigger, Better, Brighter Bletchley will finally be realised.
- **Higher education** – there are plans for MK:U, a new city centre university led by Cranfield University, including with a focus on use of the city as a ‘living laboratory’, building on its global reputation for new technologies such as driverless cars and delivery robots. The Open University (OU) is also exploring the opportunity to create an in-person teaching offer for up to 7,000 students as part of a wider tech and innovation quarter within CMK. Finally, in Bletchley, the South-Central Institute of Technology specialises in the digital sector with more than 1,000 students. These new initiatives will add to existing education provision which includes Milton Keynes University Hospital (with the University of Buckingham) and Milton Keynes College.
- **Green and blue infrastructure** – the original vision was for Milton Keynes to be “a forest city greener than the surrounding countryside”. As well as protecting existing assets and the existing network, there is also a need to deliver on established strategic objectives, and part of this means realising development-related opportunities. Stanton Low Park is a good example, with 57 ha of mixed parkland created through funding contributions made by the housing developer at 530 home Oakridge Park.
- **Diversity** – MK is highly diverse, which is a great strength. Around half of the children in schools are from a BME (Black and Minority Ethnic) family and around 30% have a first language that is not English. Whilst the population is comparatively young, the proportion of older people is increasing at a rate well above the average for England.
- **Relative deprivation** – not everyone shares in prosperity, indeed some of the city’s neighbourhoods are among the most deprived in England, and residents of the most deprived areas die up to 7.5 years earlier, on average, than those in the wealthiest neighbourhoods. Child poverty is high, with those eligible for free school meals increasing by 70% between 2019 and 2023, and levels of skills and educational attainment should be much better for a place with such a thriving economy. Accelerating social mobility is seen as key to collective future prosperity.
- **Climate change** – there is an ambitious target to be carbon neutral by 2030 and carbon negative by 2050. By 2022 the city council area had achieved a 43.5% reduction in carbon emissions per head of population from a 2013 baseline.
- **Planning for good health** – is a local priority, and MK Strategy 2050 priorities include on: A) walkable, people-friendly neighbourhoods; B) better quality housing recognising that many of the estates built in the 1970s are now in need of major investment; and C) enhancing the range of city and regional scale sports, leisure and cultural facilities.
- **Better by design** – is a key planning concept locally. Alongside many other ‘firsts’, MK built the UK’s first solar heated house in 1972, was the first council to adopt energy standards in buildings, introduced the UK’s first kerbside recycling, built the first shared ownership homes and led the way on carbon off-setting. Individual estates were designed to have a unique character, building up a patchwork effect across the city, and within estates sites were reserved to provide space for future facilities. Similarly, the grid network was built with room to introduce new forms of transport. Innovation continues today with autonomous delivery robots and trials of driverless vehicles.

2.4. The plan period

- 2.4.1. The plan period is 2022 to 2050, which is proactive in light of NPPF paragraph 22, which states:

“Local plans] should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities. Where larger scale developments such as new settlements or significant extensions... form part of the strategy for the area, policies should be set within a vision that looks further ahead...”

- 2.4.2. With regards to the start of the plan period ('base date'), 2022 reflects the start date for the plan-making process and associated evidence gathering.

- 2.4.3. With regards to the end date of 2050, to reiterate this reflects a very proactive approach and a commitment to vision led planning including in terms of economic growth and infrastructure strategy. However, on the other hand, there is a need to consider the national devolution agenda, under which sub-regional Spatial Development Strategies (SDSs) are forthcoming, i.e. there is a need to recognise that SDSs will look to establish long term growth strategy at sub-regional scales (it is yet to be confirmed the scale for an SDS that includes MK). Also, three key neighbouring local authorities – Buckinghamshire, Central Bedfordshire and Bedford – are at a relatively early stage in their plan-making process, which suggests a need to proceed with caution regarding planning for growth to 2050.

- 2.4.4. There are two further points to note:

- Since the start of the plan period there have been two full monitoring years of **completions** (i.e. for the 2022/23 and 2023/24 monitoring years; data is not yet available for 2024/25). Also, as of 1st April 2024 there were a large number of homes with planning permission, or an existing allocation that can safely be rolled forward into the new City Plan 2050,² which are collectively referred to as **commitments**.

Total supply from completions and commitments is 22,705 homes,³ which can be compared to the housing need figure of 1,799 dpa discussed above, which amounts to 50,372 homes over the 28 year plan period. This gives an indication of the plan-making task at hand, as the aim of any local plan is to provide for housing supply over-and-above completions and commitments, primarily via site allocations but also potentially 'broad locations' (see NPPF paragraph 72).⁴ It can also be noted that commitments will deliver earlier in the plan period whilst 'new supply' will tend to deliver later. Taken together the aim is to ensure a smooth trajectory of supply across the plan period.

- It is good practice to allocate sites to provide for the identified housing requirement (whatever that might be, as discussed below) for the entire plan period, and with a good degree of delivery certainty. However, there is some flexibility, with NPPF para. 72 requiring: specific “deliverable sites” for **years 1 to 5** of the plan period; specific “developable sites or broad locations for growth” for **years 6 to 10**; and “where possible”, developable sites or broad locations for **years 11 to 15**. This reflects the requirement to review local plans at which time new supply can be identified.

² Existing allocations do not necessarily have to be rolled forward into the new Local Plan. However, in practice there is typically little argument to be made for revisiting existing allocations that have already been found to be sound / suitable for development.

³ This figure excludes sites with planning permission within Central Milton Keynes (CMK), which is a change of approach relative to the Regulation 18 stage (2024) and the reason why the completions and commitments figure is now lower.

⁴ Also, any local plan can account for supply from a 'windfall assumption', i.e. homes that come forward through the planning application / development management process on sites not allocated within a local plan (typically small sites in urban areas). The windfall assumption for the City Plan 2050 is 2,990 homes, based on projecting forward past trends.

2.5. Plan objectives

2.5.1. It is important to set objectives to guide the plan-making process. Also, plan objectives are a key input to the SA process, because 'reasonable alternatives' must be defined taking account of *"the objectives... of the plan."* The plan objectives are as follows:

• People-Friendly and Healthy Places

- Create inclusive and safe places that encourage greater physical activity, social interaction and healthier lifestyles.
- Create streets and neighbourhoods that prioritise walking, cycling and wheeling for access to shops, services, community facilities, and parks and open space.
- Provide a suitable range of facilities and infrastructure in the right places at the right time to promote walkable neighbourhoods and good physical and mental health.

• Climate and Environmental Action

- New homes and commercial buildings to be net zero-carbon by 2030 and carbon negative by 2050.
- New growth prioritises active travel and public transport to reduce carbon emissions.
- Support the efficient use of resources as part of a circular economy.
- Create space for nature and deliver significant gains in biodiversity.
- Ensure that communities and nature can cope with and bounce back from negative climate impacts and environmental change.

• High-Quality Homes

- Provide a range of homes for those most in need including affordable homes, and to meet the wider market demand for housing.
- Support renewal and regeneration within neighbourhoods and communities that would benefit from it.
- Support delivery of social infrastructure to enable people to prosper and have a high quality of life.

• Economic and Cultural Prosperity

- Enable better access to education, skills and training, and economic opportunities to strengthen our regional and national economic role, with Central Milton Keynes at the heart of a diverse and resilient economy.
- Conserve our unique heritage and provide a greater diversity of places where culture can be produced and enjoyed, strengthening our role as a national and international centre of cultural and creative significance.
- Support the maintenance and creation of thriving high streets and centres for leisure.

• Central Milton Keynes

- A thriving centre for innovation, learning and culture, with all the things you'd expect to find in a city: shops, businesses, restaurants, cafés, bars and entertainment.
- Bringing nature, streets, and buildings into harmonious balance, providing a new townscape setting for public life, play, health, and wellbeing.
- Inviting new communities to make their home in CMK, with all the services and facilities they need within easy walking distance.
- Safeguarding CMK's unique public art, its modern design, and its classic infrastructure for future generations to appreciate.
- Attracting people to live and work in the city with high-quality jobs and inward investment and making it easier for people to get in and around.

3. The SA scope

3.1. Introduction

- 3.1.1. The scope of the SA refers to the breadth of sustainability issues and objectives that are taken into account as part of the appraisal of reasonable alternatives and the emerging plan. It does not refer to the scope of the plan (discussed above) nor the scope of reasonable alternatives (discussed in Part 1).
- 3.1.2. The aim here is to introduce the reader to the *broad scope* of the SA. Further information is presented in a Scoping Report that was published for consultation in 2023; however, it is important for the SA scope to remain flexible, responding to the emerging plan / reasonable alternatives and latest evidence. The SA scope – i.e. understanding of key sustainability issues and objectives, in light of contextual factors and baseline trends – is discussed within the appraisal sections below as appropriate.

3.2. The SA framework

- 3.2.1. The key outcome of scoping work is the SA ‘framework’ under which subsequent appraisal can be undertaken. The Interim SA Report (2023) utilised a framework comprising **9 objectives**. However, at the current time it is considered appropriate to expand the framework to **13 objectives** and to summarise each objective under a ‘topic’ heading. All of the objectives from 2023 are integrated in full under one or more of the current topic headings, i.e. nothing is ‘scoped out’.
- 3.2.2. The SA framework is as follows:
- **Accessibility** – support walkable neighbourhoods in existing and new areas by 2050, by improving access to health, community and leisure facilities for all people.
 - **Air quality** – protect and enhance air and wider environmental quality.
 - **Biodiversity** – protect and enhance biodiversity and the natural environment.
 - **Climate change adaptation** – avoid issues including flood risk and overheating risk and supports communities that can ‘bounce-back’ from environmental challenges helping to protect human and environmental health and account for fuel poverty.
 - **Climate change mitigation** – support reduction of greenhouse gas emissions from the built environment and support reductions in fuel poverty.
 - **Communities and health** – support improvements to physical and mental health through well designed places and by improving availability of and access to health facilities, good quality green and blue infrastructure and cultural assets for all people.
 - **Economy and employment** – support a prosperous, diverse, inclusive, and resilient economy enabled by a high skilled workforce.
 - **Historic environment** – protect and enhance designated and non-designated archaeological and wider cultural assets.
 - **Homes** – over the plan period provide a supply and mix of market and affordable good quality housing, that meets our calculated needs and aspirations.
 - **Resources** – minimise loss of productive agricultural land and support creation of a zero-waste economy in MK by 2050
 - **Landscape** – protect and enhance valued landscapes and wider landscape character.
 - **Transport** – provide and improve accessibility for communities in line with our modal shift targets, promote active travel, and minimise car dependent communities.
 - **Water** – increase water efficiency, including through water reuse and recycling measures, and take wider steps to contribute to improved water quality and well managed water resources including by supporting good wastewater management.

Part 1: Work to date

4. Introducing Part 1

4.1. Overview

- 4.1.1. As discussed, work has been under way since 2023, and a formal consultation was held under Regulation 18 of the Local Planning Regulations in 2024. However, the aim here is not to relay the entire backstory, nor to provide an ‘audit trail’ of steps taken.
- 4.1.2. Rather, the aim is to report work undertaken to examine **reasonable alternatives** in 2025 ahead of the current Regulation 19 publication stage. Specifically, the aim is to:
- explain the reasons for selecting the alternatives dealt with – see **Section 5**
 - present an appraisal of the reasonable alternatives – see **Section 6**
 - explain the Council’s reasons for selecting the preferred option – see **Section 7**
- 4.1.3. Presenting this information aligns with the requirement to report an appraisal of reasonable alternatives and “*an outline of the reasons for selecting the alternatives...*”

4.2. Reasonable alternatives in relation to what?

- 4.2.1. The requirement is to examine reasonable alternatives (RAs) taking account of “*the objectives and geographical scope of the plan*”, which suggests a need to focus on the **spatial strategy**, i.e. providing for a supply of land, including by **allocating sites**, to provide for objectively assessed needs alongside delivering on wider plan objectives. Establishing a spatial strategy is invariably a central objective of any local plan.⁵
- 4.2.2. Given the objectives of any local plan, spatial strategy alternatives can perhaps more accurately be described as **alternative key diagrams**, where the key diagram is a reflection of established development requirements, spatial strategy and site selection. Alternative key diagrams can then be termed ‘**growth scenarios**’ as a shorthand.
- 4.2.3. In short, a focus on reasonable alternatives in the form of ‘growth scenarios’ ensures a focus on mutually exclusive alternatives that go to the very heart of the local plan.⁶
- 4.2.4. Housing and employment land are key matters to explore across growth scenarios, and providing for Gypsy and Traveller accommodation needs is a further consideration.

What about site options?

- 4.2.5. Whilst individual site options clearly generate interest, they are not RAs in the context of most local plans. Were the objective to allocate one site, then site options would be RAs, but that is rarely the case for local plans. Rather, the objective is to allocate a *package* of sites and so RAs must be in the form of alternative *packages* of sites, in so far as possible. Nonetheless, consideration is naturally given to the merits of site options as part of the process of defining RA growth scenarios (Sections 5.3 & 5.4).

What about other aspects of the plan?

- 4.2.6. As well as establishing a spatial strategy, allocating sites etc, the City Plan 2050 also seeks to establish thematic policies as well as site-specific policies. These can be broadly described as development management (DM) policies. However, it is a challenge to define “reasonable” DM policy alternatives, and, in this case, none are identified following discussion with Officers.⁵ DM policies are discussed further in Part 2.

⁵ Another consideration is that to be ‘reasonable’ alternatives must be meaningfully different to the extent that they vary in terms of **significant effects**, where significance is defined in the context of the plan (taken as a whole). A focus on key diagram RAs (‘growth scenarios’) guarantees that this will be the case and so negates the need for a process of screening what should and should not then be a focus of subsequent work to explore (i.e. define, appraise and consult upon) RAs. It is also important to note that appraising a draft proposal versus the ‘do nothing’ option does not equate to an appraisal of RAs, because do nothing is the baseline and there is a separate requirement, as part of the SA process, to appraise the draft plan against the baseline.

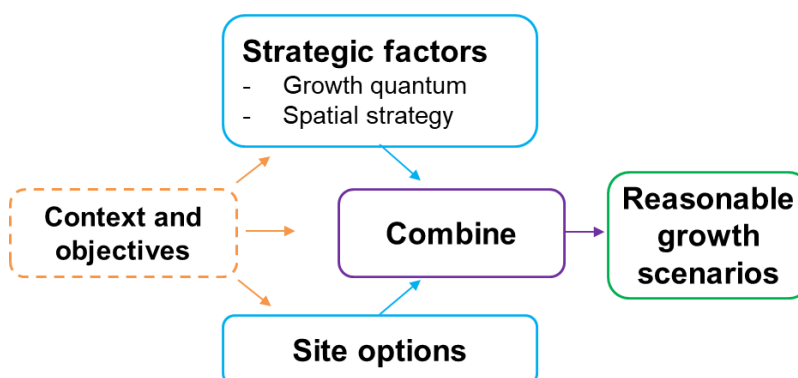
⁶ This is important in light of the regulatory requirement, when read at face value, suggests a need to appraise and consult upon alternative plans; specifically, the requirement is to appraise and consult upon: “... the plan and reasonable alternatives”.

5. Defining growth scenarios

5.1. Introduction

- 5.1.1. The aim here is to discuss the process that led to the definition of reasonable growth scenarios in 2025. To reiterate, growth scenarios equate to **reasonable alternatives**.

Figure 5.1: A standard broad process to define growth scenarios



- 5.1.2. This process is described across the following sub-sections:
- **Section 5.2** – considers strategic factors ('top down').
 - **Section 5.3** – considers individual site options ('bottom up').
 - **Section 5.4** – draws matters together to conclude on reasonable growth scenarios.

A note on limitations

- 5.1.3. This section does not present an appraisal of reasonable alternatives but rather describes the process that led to the *definition* of reasonable alternatives. The work reported here is a means to an end (reasonable alternatives) which, in turn, has a bearing on the extent of work that is proportionate, also recalling the legal requirement, which is to present an “**outline of the reasons for selecting alternatives...**” [emphasis]

5.2. Strategic factors

Introduction

- 5.2.1. The aim of this section is to explore strategic factors (issues and options) with a bearing on the definition of growth scenarios. Specifically, this section of the report explores:
- Quantum – how much development is needed (regardless of capacity)?
 - Broad spatial strategy – broadly where is more/less suited to growth; also, what growth typologies are supported, e.g. large ('strategic') sites versus smaller sites?

Quantum

- 5.2.2. A key starting point is Local Housing Need (LHN), as understood from the Government's standard method, which currently stands at 1,799 dpa or 50,372 homes in total over the plan period. Most local authorities respond to LHN by setting a housing requirement that equates precisely to LHN (where the housing requirement is the number of homes that the local authority commits to delivering, as discussed). However, under certain circumstances it can be appropriate to set a housing requirement that departs from LHN.
- 5.2.3. In practice, for Milton Keynes, there is no case for a housing requirement set below LHN, e.g. given that recent delivery rates are higher than LHN (a rarity nationally).

- 5.2.4. However, there is a need to remain open to the possibility of a housing requirement set above LHN, primarily on the basis of NPPF paragraph 69, which states:

“The [housing] requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment.”

- 5.2.5. Beginning with the latter part of this sentence, it is clear that Milton Keynes is an example of a city where there are “*growth ambitions linked to economic development*”.
- 5.2.6. With regards to making “provision for neighbouring areas”, there is no strongly evidenced case for doing so; however, the possibility cannot be entirely discounted. In particular, it can be noted that Buckinghamshire Council recently published a local plan ‘direction of travel’ that indicates the possibility of not being able to provide for LHN in full. This is evidence that must feed in to defining growth scenarios; however, the Buckinghamshire consultation is also clear that the Council is at an early stage of the process of identifying housing land supply, and a strong case for ‘exporting’ unmet need can only be made once detailed work has been completed to demonstrate ‘no stone left unturned’ (although, on the other hand, NPPF para 28 explains that effective cooperation can mean not “waiting for a full set of evidence from other authorities”). Furthermore, even if Buckinghamshire were to evidence the need for a housing requirement set below LHN it does not automatically follow that the resulting unmet need must flow to Milton Keynes (in whole or in part); rather, there would be a need for work to consider where the unmet need should be provided for (and any such work is highly challenging in practice, in the absence of an established subregional strategy).
- 5.2.7. Finally, a high level case for setting a housing requirement “higher than identified need” can occasionally be made on the basis of seeking to provide more fully for affordable housing needs, in light of the Government’s Planning Practice Guidance (PPG), which states: “*An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.*” However, it is not clear that there is a strong case for taking this step in the Milton Keynes context, where affordable housing need is understood to stand at 18,061 homes over the plan period, or ~36% of LHN. Competing costs including relating to infrastructure delivery can and do impact the ability for some sites to deliver affordable housing (e.g. complex urban sites and strategic sites requiring major infrastructure) but it may be possible to deliver affordable housing as a component of market housing-led schemes at an average rate of circa 36% (N.B. there is also a need to factor in tenure split, i.e. the case for a high proportion of affordable housing to be social rented / social housing). Taking Q1 2025-26 as an example (see data [here](#)), of 622 completions were affordable and 8% of 190 starts were affordable.
- 5.2.8. In **conclusion**, in addition to focusing on the option of setting the housing requirement at LHN, a housing requirement set above LHN remains a possibility to reflect growth ambitions, unmet need (risk) and/or affordable housing need. Whilst in 2024 the growth scenarios at the time all involved supply sufficient to enable the housing requirement to be set at LHN, the case for ‘higher growth’ has now perhaps increased somewhat.
- 5.2.9. Final points to note regarding growth quantum are as follows:
- Employment land – this is also a key issue for the MK City Plan 2050, with a need for 433 hectares over the plan period, mainly for warehousing. This is a *residual* need figure that accounts for (deducts) supply from completions and *planning permissions*.
 - Gypsy and Traveller accommodation needs – this has emerged as a pressing issue since the 2024 consultation stage, with a new ‘accommodation assessment’ finding there to be a need for 75 pitches by 2050, including a need for 38 pitches by 2030.
 - Requirement versus supply – to ensure that the housing requirement is delivered year on year (N.B. the requirement should ideally be set at a flat rate across the plan period but alternatively might be ‘stepped’) there is typically a need to ensure that identified supply exceeds the requirement (at least in the early years of the plan period) as a contingency for unforeseen delivery issues and aimed at avoiding ‘the presumption’.

Broad spatial strategy

- 5.2.10. Section 2.3 has already introduced a range of broad spatial strategy issues and opportunities. One of the key messages is that there is a near unique opportunity to take bold steps to deliver on a long term vision, including with a focus on an ‘infrastructure first’ strategy. The plan document explains:
- “A feature of the approach to development and growth in Milton Keynes has always been the concept of ‘infrastructure before expansion’... This approach has led to the creation of several features unique to Milton Keynes, such as the system of grid roads and linear parks stretching across the city...”*
- 5.2.11. The recent local plans for Milton Keynes have not been perfect in this regard, and nor will the MK City Plan 2050 in the absence of a sub-regional strategy (the Government recently legislated for this) but the opportunity to take bold steps to deliver on a long term vision far exceeds that for many other areas nationally. Specifically, that is because the new MK City Plan benefits from:
- a plan period to 2050;
 - strategic direction from MK Strategy 2050;
 - a good degree of shared goals / vision within neighbouring areas;
 - a solid foundation in the form of Plan:MK with strategic allocations set to deliver over the early years of the new plan period; and
 - the heritage of Milton Keynes as somewhere ambitious to deliver good growth.
- 5.2.12. In practice, this all means that there is a clear case for focusing attention on strategic growth locations that can be masterplanned to ensure a good mix of new homes, a good mix of uses (including employment land and potentially Gypsy and Traveller pitches) and timely delivery of strategic infrastructure (e.g. transport, community, green, blue, grey).
- 5.2.13. This was a central pillar of the strategy underpinning Plan:MK and was similarly central to the Draft MK City Plan 2050 (2024), which was broadly well received (albeit there are a range of specific and broad strategic issues and constraints to explore further).
- 5.2.14. This is in contrast to many local plans that can struggle to justify allocating strategic growth locations that will deliver in the longer term, which can lead to a perpetual cycle of opportunities missed to secure targeted investment and the wider benefits of growth.
- 5.2.15. In **conclusion**, this discussion of broad spatial strategy serves to frame the subsequent discussion of site options and, in turn, the conclusion on RA growth scenarios.

5.3. Site options

Introduction

- 5.3.1. This is the second broad step in the process of defining RA growth scenarios (see Figure 5.1). The aim is to introduce the specific site / supply options that are the building blocks for growth scenarios. This section considers:
- The Milton Keynes urban area
 - Strategic greenfield site options
 - Smaller greenfield site options
 - Non-residential site options

The Milton Keynes urban area

- 5.3.2. Maximising urban supply is a key strategic focus of the MK City Plan 2050, and the current plan document explains:

*“In stark contrast to the Core Strategy and Plan:MK, this represents a **significant shift** in how the city will grow.” [emphasis added]*

5.3.3. The plan document further explains:

“Directing growth to locations within the existing city will help us tackle climate change and support residents in accessing opportunities that enable them to lead healthy lives. Our Carbon and Climate Study indicates that growth centred around the city, which is also linked to a new Metro system, will enable us to limit carbon emissions quicker...”

Growth in these locations would support our aims for investment in and renewal of Central Bletchley and deliver transformational growth in Central Milton Keynes to make the city centre a more vibrant, exciting and liveable place. Aligned with our work on exploring a new Metro system, we have undertaken some initial work to identify what potential there may be for growth located in and around potential new Metro stops or hubs... While further work is needed to understand this potential better, we are confident that there is significant scope for growth aligned to the Metro...

Given the unique way in which Milton Keynes has evolved as a city, there are few significant brownfield sites or opportunities within the existing built-up area. However, we have identified two opportunities which do represent strategic brownfield opportunities that together could provide around 850 new homes – Wolverton Railway Works and Walton Hall. Wolverton Railway Works has long been established as a prime brownfield redevelopment opportunity and already has local support...

We are aware that there may be other significant opportunities for renewal and regeneration associated with some of the original estates in Milton Keynes, such as Netherfield and Beanhill. These could also be locations for new homes as part of any future regeneration programmes and in connection with the new Metro system. However, these opportunities need to be explored with the local communities... This means we cannot, at this time, indicate how many new homes could come forward....”

5.3.4. The current proposal involves 16,000 homes in CMK (to 2050), 1,184 homes in Bletchley, 2,500 homes along Metro Corridors and 850 homes from the two large brownfield sites, leading to a total urban supply of 20,534 homes.

5.3.5. This figure includes CMK commitments (a difference from 2024) but excludes a windfall assumption. The main substantive difference to the proposal in 2024 is reduced supply from the two large brownfield sites.

5.3.6. There is no reasonable need to question this strategy, for the purposes of defining RA growth scenarios. If the investment will be in place to successfully deliver the ambition, then there is a clear case for backing it strongly. The 20,534 homes figure reflects a range of detailed assumptions regarding density, use mix, design and the types of site that will be developed, but there is no strategic case for questioning these assumptions.

5.3.7. However, there is a need for scrutiny of the assumed 20,534 home urban supply figure from a delivery perspective. This figure is considered by officers to be suitably conservative (e.g. note discussion above regarding certain downward adjustments since 2024; also the cautious approach to assumed supply from estate regeneration) but there remain uncertainties (e.g. note the CMK supply boost and Metro Corridor uncertainties).

5.3.8. Overall, there is an element of delivery risk – both in terms of delivery in the plan period and timely delivery within the plan period (i.e. in line with anticipated ‘trajectory’) – and, as such, there is a case for exploring a lower urban supply figure. However, this approach is not favoured, because it would not be possible to draw meaningful conclusions regarding the merits of two alternative supply figures based solely on alternative delivery assumptions. Rather, delivery risk must factor into subsequent consideration of non-urban supply options with a view to a healthy ‘supply buffer’.

5.3.9. In **conclusion**, the new urban growth strategy is strongly supported but there is delivery risk, which must feed into discussion below regarding the necessary ‘supply buffer’.

Figure 5.2: Elements of the strategy for CMK

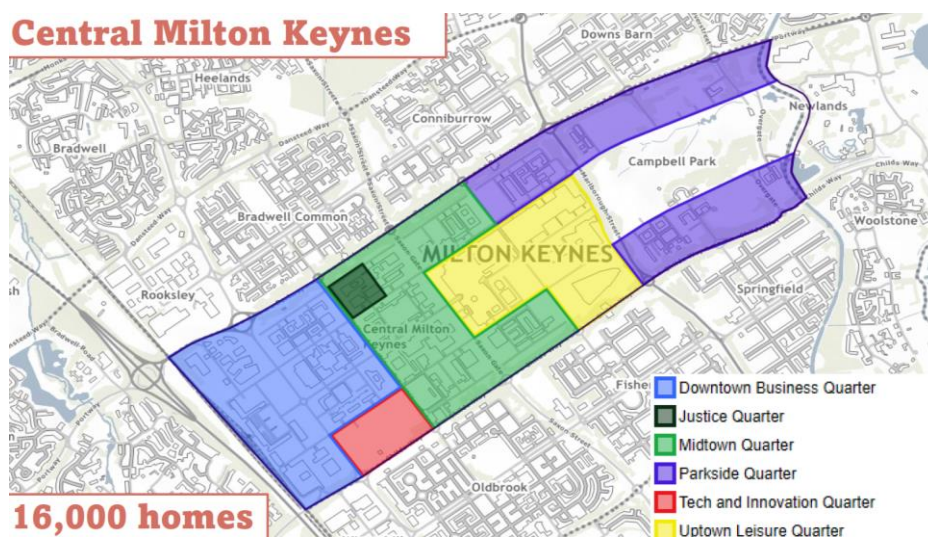


Figure 5.3: Elements of the strategy for Metro Corridor growth

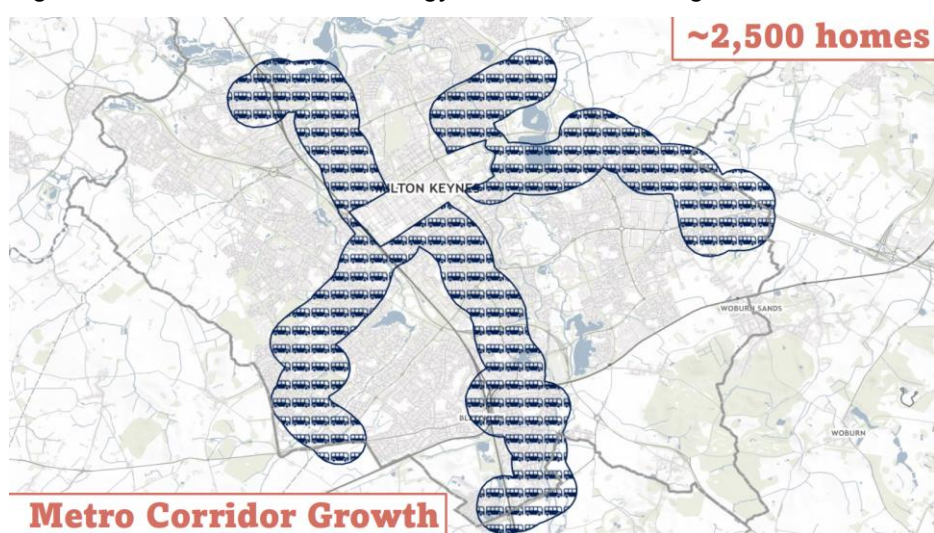
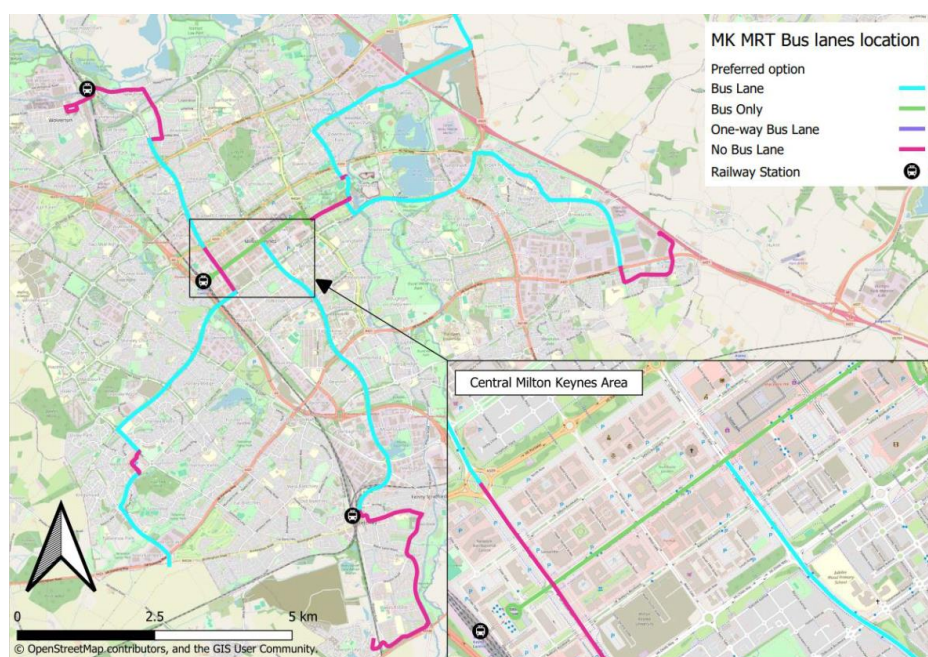


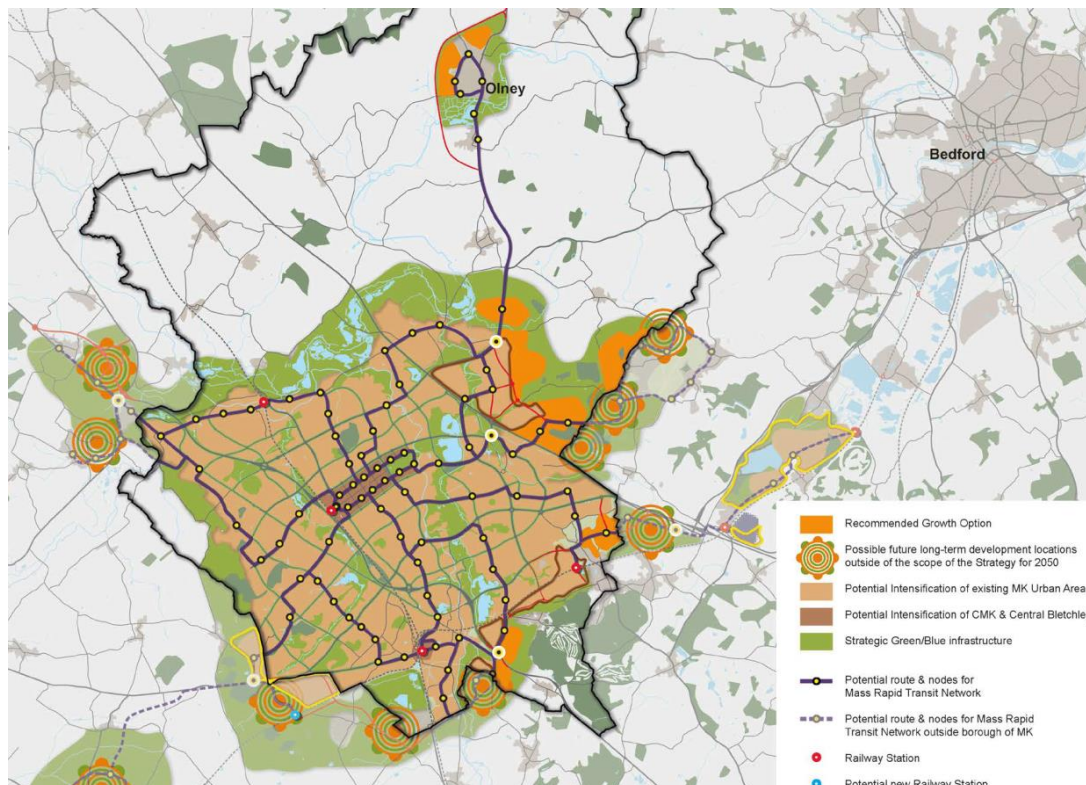
Figure 5.4: Preferred option for bus lanes within identified Metro Corridors



Strategic greenfield site options

- 5.3.10. Exploring available strategic greenfield site options is clearly a key step in the process of defining growth scenarios, and a starting point is the recommended growth option (RGO) within MK Strategy 2050 – see Figure 5.5.

Figure 5.5: The MK Strategy 2050 recommended growth option



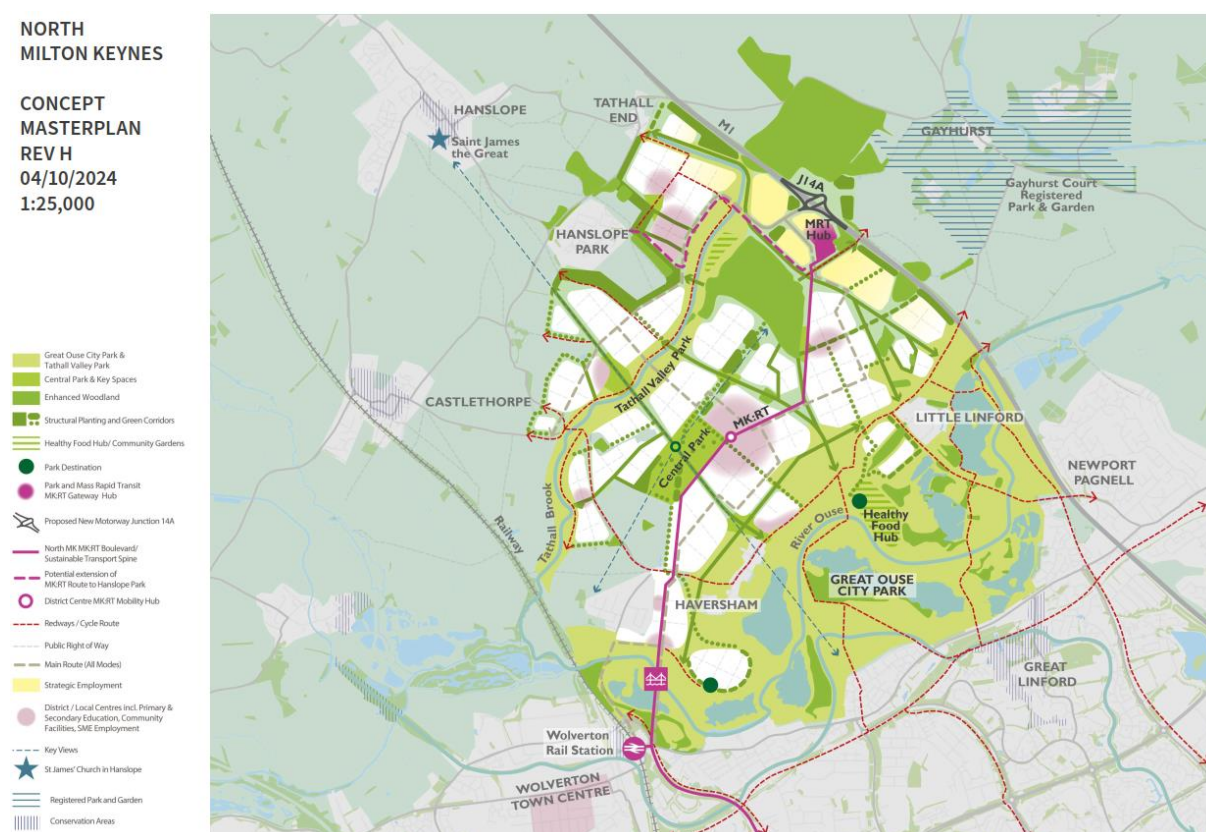
- 5.3.11. The RGO was informed by evidence but was still only indicative and so needed to be tested in detail alongside wider potential growth locations in 2021-24.
- 5.3.12. In particular, the Interim SA Report (2024) discussed the following strategic greenfield site options in turn:
- **Eastern Strategic City Extension** – would expand an existing strategic allocation from Plan:MK (MK East) that is now under construction, taking the edge of Milton Keynes to the western edge of Cranfield. Total capacity is envisaged to be around 16,000 homes with 7,750 homes by 2050. The vision has evolved since Figure 5.5 and, as part of this, it is important to be clear that no assumptions are made regarding possible long term expansion into Central Beds. A final consideration is that the site can deliver early (highly unusual for a site of this scale) because it can ‘tap into’ infrastructure within the adjacent MK East site that is under construction. Specifically, it is envisaged that it will from 2030/31 and will deliver 275 homes in this monitoring year, which is very important from a perspective of being able to demonstrate a five year housing land supply (5YHLS) at the point of plan adoption and then maintain a 5YHLS.
 - **East of Wavendon City Extension (ESCE)** – is shown in Figure 5.5. It would complete the expansion of Milton Keynes to the east within the Council’s boundary, to the south of the recently delivered Strategic Land Allocation (SLA) and to the northeast of the Plan:MK South East MK strategic allocation (see Figure 2.1). As shown in Figure 5.5, there may be potential for further growth adjacent to this site within Central Beds.
 - **South of Bow Brickhill City Extension** – is shown in Figure 5.5. It would complete expansion in this sector as far as the Greensand Ridge and would be adjacent to the east of the Plan:MK South Caldecotte strategic employment allocation (Figure 2.1).

- Levante Gate City Extension – is shown in Figure 5.5. It is located adjacent to South of Bow Brickhill (separated by the A5) and would again expand the city as far as the Greensand Ridge. It would be adjacent to the east of the Eaton Leys Plan:MK strategic allocation and Figure 5.5 indicates possible growth within Buckinghamshire (again, this is only highlighted as a possibility, and no assumptions are made).
- Shenley Dens City Extension – is not shown in Figure 5.5. The site is at the western edge of the city adjacent to Oakhill Wood, Grange Farm (delivered in the early 2000s) and the Western Expansion Area (WEA; under construction following a Development Framework SPD adopted in 2005). The site was excluded from the WEA (shown [here](#)) but was then explored in detail when preparing Plan:MK. It would take the city edge west as far as, or beyond, the 'Shenley Ridge' which marks the edge of the Calverton Brook / Whaddon Valley; see Landscape Character Area 3b [here](#).
- West of Olney – is shown in Figure 5.5, which also highlights that the option is tied to new a bypass. However, financial viability is a barrier to delivering a bypass if growth is focused only to the west of the town, whilst the option of supporting additional growth to the north (as per Figure 5.5) is challenging from a suitability perspective, including as: the community would be separated from the town by a sewage works and industrial area; there would be a risk of uncontained sprawl; and there would be further traffic through the town. Also, a bypass is challenging on account of the River Great Ouse. Finally, there is also little no existing secondary school capacity and if growth must deliver a new secondary school this would act as a further burden on viability.
- North of Newport Pagnell – is shown in Figure 5.5 (focusing on land west of the A509). It would relate closely to a committed site known as Tickford Fields, which was identified for 400 homes in the Core Strategy (2013) before being allocated through a Neighbourhood Plan (2016) for 1,200 homes and then gaining permission for ~1,000 homes (it is discussed in the second [Newport Pagnell Neighbourhood Plan](#), 2024).
- MK North New Settlement – is not shown on Figure 5.5. It is a large scale growth option and was previously closely considered when preparing Plan:MK but was ultimately not supported. In turn, it was not supported by MK Strategy 2050. Whilst close to MK, it is referred to here as a new settlement recognising that the River Great Ouse Valley is a major barrier to linking with the city. It is distant from East West Rail / the main growth corridor and would require a costly new junction onto the M1 and/or significant highway infrastructure (including bridge structures) to cross the river valley.
- Hardmead New Settlement – is not shown on Figure 5.5 but is located on the A422 equidistant between Milton Keynes and Bedford. It was not previously considered when preparing Plan:MK and very little work has been undertaken around vision, proof of concept etc, let alone detailed work to explore viability etc. The A422 is not a strategic road corridor and there is overall no clear alignment with transport strategy.

- 5.3.13. The Interim SA Report (2024) considered these 9 strategic greenfield options in turn before concluding that the final three options listed above perform relatively poorly. In turn these three options were ruled out, recognising that total combined capacity of the first six options listed above is more than sufficient to allow the housing requirement to be set at LHN (with a healthy supply buffer), once account is taken of supply from completions, commitments, the urban area and a windfall assumption.
- 5.3.14. The situation is unchanged, with Hardmead New Settlement performing particularly poorly, followed by North of Newport Pagnell (it was an employment land option when preparing Plan:MK and any housing led option would likely need to follow significant progress having been made on ESCE). MK North warrants ongoing consideration, but ESCE is the preferable option, both from a suitability perspective and from a deliverability perspective, and it is difficult to envisage allocating both sites.

- 5.3.15. Focusing on MK North, in addition to the aforementioned issues of connectivity to MK and the lack of an M1 junction, a further key issue is that the site significantly intersects the River Great Ouse Special Landscape Area (SLA), with specific sensitivities including the small village of Haversham, Little Linford Wood (locally designated) and a network of public rights of way. Rising land and other landscape features could helpfully provide an element of containment within the landscape (minimising concerns regarding sprawl), but overall ESCE is the clear preferable option from a landscape perspective on the basis that it does not intersect an SLA (albeit there are landscape and wider environmental sensitivities, as discussed further below).
- 5.3.16. In **conclusion**, the first six sites listed above warrant being taken forward to the RA growth scenarios at the current time, as per the decision reached in 2024.

Figure 5.6: Site promoter's concept masterplan for MK North (2024)



Small greenfield site options

- 5.3.17. This is an important category of supply with a view to a good mix of sites / supply, both in terms of type and location. In particular, smaller greenfield sites benefit from: being able to deliver early; low delivery risk; strong development viability (supportive of affordable housing delivery); and being suited to smaller housebuilders. Also, smaller sites can deliver on strategic objectives for smaller settlements.
- 5.3.18. At Milton Keynes there are smaller site options that would extend the WEA, but these have been considered in the past and been judged not to perform well, with a concern around piecemeal expansion with opportunities missed, e.g. in terms of planning for the Calverton Brook Valley. There is a clear case for a strategic approach to any further growth in this sector of the MK edge, including working with neighbouring authorities.
- 5.3.19. At Olney there are constraints, including in terms of transport connectivity and infrastructure capacity, and there is overall no clear case for non-strategic growth. A Neighbourhood Plan was 'made' in 2017 that allocated several sites to deliver significant growth, and the Town Council could be well placed to prepare a further similar plan.

5.3.20. Hence attention focuses on the villages, but there is not considered to be a strong case for smaller allocations at villages because:

- Parish councils are encouraged and supported to prepare neighbourhood plans that allocate sites to address local needs and any specific growth related issues / opportunities, plus there is scope for non-allocated 'windfall sites' where appropriate, e.g. where they would deliver clear benefits to a village. There is good evidence of neighbourhood plans allocating sites although the task is now more challenging because there is reduced national funding available for neighbourhood plans.
- The housing land supply position in the early years of the plan period is considered suitably robust, on the assumption that the housing requirement is set at LHN.
- Whilst there are reasonable site options at villages, as identified through the Strategic Housing Land Availability Assessment (SHLAA), it is difficult to pinpoint specific better performing sites that would be front-runners for allocation. Site selection would be a major exercise, including working in collaboration with parish councils and, in practice, attention has focused on exploring urban and strategic greenfield options including with a focus on sites that can achieve 'Infrastructure First' objectives.
- There are no clear and pressing village specific growth related issues / opportunities, e.g. in terms of new or improved infrastructure such as a primary school extension, nor is maintaining primary school rolls known to be a pressing issue anywhere. However, it is acknowledged there are clear arguments for rural growth to meet local needs (e.g. homes for younger people and families) and generally maintain village vitality.
- There is considered to be a clear decarbonisation / net zero case for focusing growth within and on the edge of Milton Keynes rather than in the rural area – see Box 5.1.

5.3.21. In **conclusion**, the option of smaller greenfield allocations is ruled out as per 2024.

Box 5.1: Discussion from 2024 regarding decarbonisation and growth options

The following text from the Interim SA Report (2024) still broadly holds true:

"The Preferred Growth Option would avoid piecemeal development in the rural area, growth which would produce higher cumulative carbon emissions [compared to the preferred option], and growth in locations that have significant infrastructure or site constraints that question the deliverability of infrastructure. The Preferred Growth Strategy and its focus on strategic scale options would enable an 'infrastructure first' approach to be taken so that key community amenities and other infrastructure can be provided viably and in a timely way.

... A key [objective] is reducing cumulative carbon emissions from growth and creating new communities that are resilient to a changing climate. The Carbon and Climate Study shows that concentrating growth in the city is the best option for reducing cumulative carbon emissions, principally due to reduced emissions from transport. In contrast, growth dispersed across the rural area tends to result in much higher cumulative carbon emissions over the long term due to reliance on the car to get around. Conversely, new growth in the city... is potentially less resilient to climate change than other options, namely due to urban heat island effects.

... our Preferred Growth Strategy would result in a further 16,500 homes located in the city. This represents around 48% of the additional growth under the Preferred Growth Strategy, or 68% of our Local Housing Need, being in locations that would mutually benefit from Mass Rapid Transit and greater public transport services and are the most carbon efficient. Most of the remaining growth in the Preferred Growth Strategy would be within Strategic City Extensions. Whilst these are not as carbon efficient as growth in the city, they are more efficient than piecemeal growth in the rural area. They also provide greater opportunities for creating climate resilient communities than growth in the city, given the greater opportunity to provide large scale green and blue open spaces. Overall, the Preferred Growth Strategy strikes the most optimal balance...

... Together with the redevelopment of our city centre, Bletchley and brownfield sites, the Preferred Growth Strategy would support opportunities for renewal and regeneration, support the creation of walkable, people-friendly and healthy places, and produce a lower cumulative carbon emission profile than other options delivering this quantum of growth."

Non-residential site options

- 5.3.22. Beginning with **employment land**, as discussed in Section 5.2, the total identified residual need is for 433 ha (N.B. this is the mid-range estimate from the Housing and Economic Development Needs Assessment, HEDNA), whilst total identified supply is 210 ha (N.B. the new supply includes existing allocated sites).
- 5.3.23. The identified supply broadly aligns with that previously proposed at the Regulation 18 stage. ESCE can deliver around 40ha of new employment land, but otherwise new supply does not involve any new strategic city extensions. Other than ESCE (discussed further in Section 5.4), there is no clear basis for questioning the identified new supply.
- 5.3.24. With regards to omission sites (i.e. site options that do not form part of the identified supply), there is clear 'top down' pressure to consider the possibility of additional allocations given the technical shortfall in respect of employment land supply as measured against identified need (433 ha – 210 ha = 223 ha).
- 5.3.25. However, the shortfall is in respect of land for warehousing and distribution / logistics, and it is important to note that the industry is somewhat footloose such that there will be good potential for unmet needs to be provided for elsewhere in the subregion to good effect. This could well include locations outside of the City Council's boundary on the wider Strategic Road Network, and potentially in close proximity.
- 5.3.26. The HEDNA explains this matter as follows:
- "Whilst this analysis shows a potential shortfall of land for industrial and warehouse development, it is important to note that there is an element of circularity in such analysis. Demand will only emerge where suitable sites are available. For logistics uses in particular, the necessity for large flat sites with excellent strategic transport access is typically more important than immediate location. Occupiers will consider an area of search much larger than a single local authority area. If suitable sites do not exist the selection of alternatives will likely involve looking farther afield for sites which meet the requisite criteria, rather than considering a site in a specific location..."*
- 5.3.27. With regards to specific sites that could feasibly boost logistics supply, it is very difficult to identify realistic options, given the paucity of remaining large and relatively flat sites well connected to the Strategic Road Network. Attention focuses on South of Bow Brickhill and Levante Gate but both sites are discussed above as residential options and both sites are considered to be more suitable for residential (and are available / being promoted for residential) including noting landscape sensitivity. Another feasible possibility is North of Newport Pagnell, which again is discussed above as a residential growth option, but land adjacent to the A509 / A422 is raised and sloping land and within an SLA; also, generally (as discussed) it is difficult to consider this site ahead of ESCE.
- 5.3.28. The other theoretical possibility is supporting MK North as a mixed use new settlement on the basis that (amongst other things) it could deliver significant new logistics floorspace. However, this would require a new motorway junction and, as discussed, it is not clear that MK North is deliverable on this basis (plus there are wider deliverability and suitability challenges, as discussed). Also, the land identified for 'strategic employment' within MK North (Figure 5.6) is somewhat sloping.
- 5.3.29. In summary, there are no clear options for significantly boosting logistics floorspace supply. It can be noted that this position is unchanged from 2024, at which time the Interim SA Report explained:
- "What we do not have are any new options to accommodate large-scale warehousing and logistics. This is most likely because land in the most preferred locations (close to junctions on the strategic road network) has already been exhausted for warehousing and logistics or other development. Land or sites further afield from junctions on the strategic road network are not seemingly attractive enough to the market for landowners to promote their land for these uses."*

- 5.3.30. With regards to providing for **Gypsy and Traveller accommodation needs**, total identified need is 75 pitches, and the identified supply is 69 pitches plus a further six pitches are expected to become available over the plan period through household dissolution. This suggests that needs may be met over the plan period; however, the identified supply is associated with timing issues and delivery risks given a reliance on new supply within strategic allocations (strategic city extensions).
- 5.3.31. In turn, there is a case for seeking to boost supply. However, there are no identified omission sites feasibly in contention for allocation, nor any further clear options for regularisation, intensification or extension of existing sites. Therefore, and in summary, there are no clear options for significantly boosting Gypsy and Traveller pitch supply.

5.4. Combine to form RA growth scenarios

- 5.4.1. Having discussed 'top down' strategic and 'bottom up' site specific issues and options, the final task is to combine these factors to arrive at RA growth scenarios.
- 5.4.2. As discussed in Section 2.4, a starting point is supply from **completions** since 2022 and **commitments** (i.e. sites with planning permission or an existing allocation), which is 22,705 homes (less than in 2024 because CMK commitments are now included in the 16,000 CMK supply discussed below).
- 5.4.3. The next port of call is a **windfall assumption**, i.e. assumed supply from small non-allocated sites. This is calculated to be ~2,990 homes, as per 2024. N.B. no assumption made regarding larger windfall sites but, in practice, additional supply from larger windfall sites is likely, e.g. estate regeneration and sites at villages.
- 5.4.4. Next is the 20,534 home **urban supply** figure introduced above, including 16,000 homes from CMK. As discussed, this supply can reasonably be held constant across the RA growth scenarios but there is a need to account for delivery uncertainties / risk. This leads to a *minimum* residual need for $50,372 - 22,705 - 2,990 - 20,534 = 4,143$ homes to be delivered through greenfield allocations *if* the housing requirement is to be set at LHN, and where this is a minimum figure due to the need for a supply buffer.
- 5.4.5. Total supply in the plan period from the six **strategic greenfield sites** shortlisted above is currently understood to stand at 14,550 homes. This is a modest reduction from the equivalent figure in 2024 because two sites are now expected to yield fewer homes in the plan period (primarily due to heritage and landscape sensitivities) although ESCE is now expected to yield slightly more homes (7,750). Allocating all six was seen as unreasonable in 2024, but it is now considered a reasonable scenario. Total supply would be 60,745 homes such supply would be 21% above LHN over the plan period.
- 5.4.6. With regards to other select combinations of the six greenfield strategic site options, there are obviously many such combinations and so there is a need for pragmatism.⁷ A clear starting point is an understanding that five of the six were proposed allocations in 2024, namely all bar **West of Olney**. This approach remains a clear reasonable scenario to test at the current time and, indeed, remains the preferred approach.
- 5.4.7. Next is an understanding that three of the six sites are sensitive in landscape terms (as introduced above), namely **South of Bow Brickhill**, **Levante Gate** and **Shenley Dens**. As per 2024 it is reasonable to explore a scenario involving non-allocation of these sites.
- 5.4.8. Moving on to **East of Wavendon**, whilst in many respects this is a logical location for an urban extension, including noting that Central Bedfordshire previously considered land to the east as a growth location when preparing their current adopted plan, there are a range of challenges. The possibility of not allocating this site was tested through the RA growth scenarios in 2024 and, on balance, it remains reasonable to test this possibility.

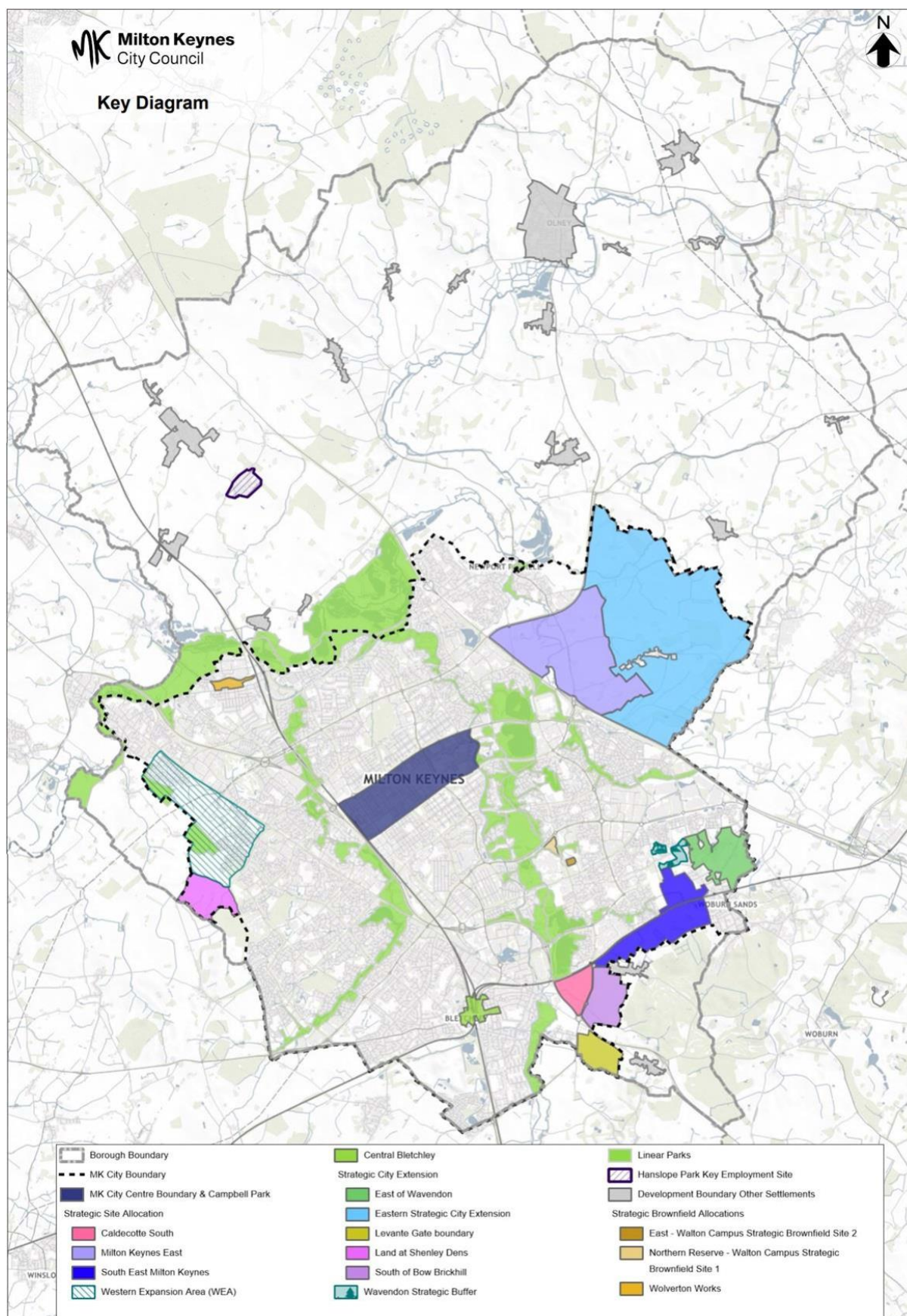
⁷ As stated within the Inspectors Report for the Vale of Aylesbury Local Plan (2021): "The phrase 'all reasonable alternatives' does not equate to all conceivable alternatives." It is appropriate to keep the number of growth scenarios to a suitably low number aimed at ensuring an appraisal that is accessible and engaging to the widest audience; and a key test is whether the number and range of scenarios is sufficient to enable the full range of key issues/opportunities and impacts to explored.

- 5.4.9. Finally, with regards to **ESCE** (Eastern City Strategy Extension), in 2024 it was considered to be the strongest performing of the six shortlisted strategic greenfield site options and so was held constant across the RA growth scenarios (i.e. allocation was assumed under all scenarios), and this approach remains reasonable at the current time. Key points to note include: A) the site has been a focus of detailed work since 2024 including in respect of strategic infrastructure planning in collaboration with landowners and key partner organisations; B) ESCE is key for delivering employment land and providing for Gypsy and Traveller accommodation needs; and C) the site can deliver significant numbers of homes relatively early in the plan period.
- 5.4.10. Final considerations are then:
- Non-strategic greenfield sites – no allocations are proposed nor is there an assumption regarding supply from neighbourhood plans. The Interim SA Report (2024) explained: “... Our recommended approach to rural areas is to allow housing allocations to be decided by Neighbourhood Plans. Therefore, growth in rural areas has not been factored in to overall or affordable housing totals in the preferred approach.”
 - Employment land – supply is held constant across the scenarios. Specifically, there is supply from: A) a range of existing allocations without permission; and B) an assumption of around 40ha new employment land as part of ESCE.
 - Gypsy and traveller pitches – supply from ESCE (31 pitches by 2035) is a constant whilst supply from Shenley Dens (15 pitches by 2035) is a variable.
- 5.4.11. The above discussion leads to **six RA growth scenarios**, which are set out in the table below. They can also be described in summary with reference to Scenario 5, which is the emerging preferred approach, or ‘preferred option’ (PO), as follows:
1. The PO **minus** South Bow Brickhill, Levante Gate and Shenley Dens
 2. The PO **minus** East Wavendon
 3. The PO **minus** S. Bow Brickhill, Levante Gate and Shenley Dens **plus** West Olney
 4. The PO **minus** East Wavendon **plus** West Olney
 5. The preferred option (**PO**)
 6. The PO **plus** West Olney
- 5.4.12. Figure 5.7 is the City Plan 2050 Key Diagram and therefore shows Option 5, i.e. it shows all constant and variable growth locations other than West of Olney.

Table 5.1: The RA growth scenarios (with constants greyed-out)

Source of supply	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6
Completions/commitments	22,705	22,705	22,705	22,705	22,705	22,705
Windfall	2,990	2,990	2,990	2,990	2,990	2,990
Urban supply inc. CMK	20,534	20,534	20,534	20,534	20,534	20,534
ESCE	7,750	7,750	7,750	7,750	7,750	7,750
East of Wavendon	2,250	-	2,250	-	2,250	2,250
South of Bow Brickhill	-	1,300	-	1,300	1,300	1,300
Levante Gate	-	1,250	-	1,250	1,250	1,250
Shenley Dens	-	1,000	-	1,000	1,000	1,000
West of Olney	-	-	1,000	1,000	-	1,000
Total supply 2022-2050	56,229	57,529	57,229	58,529	59,779	60,779
% over LHN (50,372)	12%	14%	14%	16%	19%	21%

Figure 5.7: Growth scenario 5



N.B. this figure shows committed as well as new proposed growth locations. Specifically, the committed growth locations are those shown in the figure as a 'Strategic Site Allocation'.

6. Growth scenarios appraisal

6.1. Introduction

6.1.1. The aim here is to appraise the reasonable alternative (RA) growth scenarios introduced above under the SA framework (Section 3). To reiterate, the scenarios can be described as follows with reference to the preferred option (PO), which is Scenario 5:

1. The PO **minus** South Bow Brickhill, Levante Gate and Shenley Dens
2. The PO **minus** East Wavendon
3. The PO **minus** S. Bow Brickhill, Levante Gate and Shenley Dens **plus** West Olney
4. The PO **minus** East Wavendon **plus** West Olney
5. The preferred option (**PO**)
6. The PO **plus** West Olney

Appraisal methodology

6.1.2. Under each sustainability topic the aim is to: **1)** rank the scenarios in order of performance (with a star indicating best performing); and then **2)** categorise the performance in terms of 'significant effects' using red / amber / light green / green:

- **Red** indicates a significant negative effect
- **Amber** indicates a negative effect of limited or uncertain significance
- **Light green** indicates a positive effect of limited or uncertain significance
- **Green** indicates a significant positive effect
- **No colour** indicates a neutral effect

6.1.3. There is a need to draw upon wide ranging sources of evidence and make significant assumptions, e.g. around scheme masterplanning, infrastructure delivery, etc. Sources of evidence and assumptions are explained as appropriate, but there is also a need to balance explanation of evidence base and assumptions with a need for conciseness.

6.1.4. Another key assumption is in respect of the future baseline, i.e. the situation without an adopted plan with a robust land supply. Specifically, the assumption is that there would be a risk of sub-optimal growth under the presumption in favour of sustainable development. This is an important assumption, because a predicted significant effect is, by definition, a significant effect are *on the baseline*.

6.1.5. Finally, there is a need to factor in unknowns regarding growth elsewhere, including recognising that the local plans for neighbouring Buckinghamshire, Central Bedfordshire and Bedfordshire are all at a relatively early stage of preparation, plus work around growth strategy is ongoing and will likely increase over coming years at the sub-regional scale. As part of this, there is a need to acknowledge an 'unknown' regarding whether Buckinghamshire can provide for housing need in full and, if it transpires that this is not the case, where the resulting unmet need will need to be provided for.

6.2. Accessibility (to community infrastructure)

1) PO minus S. Bow Brickhill, L. Gate, S. Dens	2) PO minus E. Wavendon	3) PO minus S. Bow Brickhill, L. Gate, S. Dens plus W. Olney	4) PO minus E. Wavendon plus W. Olney	5) Preferred option (PO)	6) PO plus W. Olney
3	3	3	3	1	2

- 6.2.1. Higher growth scenarios direct homes to strategic sites able to deliver community infrastructure alongside new homes. As such, **lower growth** is not supported.
- 6.2.2. **Levante Gate** and **South of Bow Brickhill** can be planned in combination including to complement the adjacent Eaton Leys site under construction and mindful of possible further growth south in Buckinghamshire; delivering a secondary school is an important option to explore. What can be delivered at **Shenley Dens** is less clear, and it is noted that a variety of capacity/scheme options have been explored over the years (e.g. there was a refused planning application for 2,055 homes in 2004, before the option of 1,500 homes was explored ahead of Plan:MK; also, the proposal to deliver Gypsy and Traveller pitches is recent, and will have implications for masterplanning and viability), but a primary school is likely an option and the site relates well to existing community infrastructure (e.g. a recently delivered secondary school is nearby) and CMK is in relative proximity (c.4.5km). A benefit of the site is that there is a single landowner.
- 6.2.3. Finally, in respect of all three of the above sites it is noted that these sites have relatively strong development viability. Specifically, it is known that they have stronger viability than East of Wavendon (a variable across the scenarios) and ESCE (a constant) and far stronger than urban sites (a constant), although it isn't known how West of Olney compares. Strong development viability suggests good potential to deliver community infrastructure onsite and make a full Section 106 (S106) contribution whilst also delivering on wider policy objectives with cost implications, e.g. affordable housing.
- 6.2.4. **East of Wavendon** is supported on the basis that it is now a clear strategic growth option, including one that is able to deliver a District Park (minimum of 15ha). This is in contrast to the situation when preparing Plan:MK when the concern was piecemeal growth with opportunities missed. However, there is a need for further work to confirm what can be delivered given heritage sensitivities (potentially linked to ecological constraints) within the northern half of the site, and how opportunities can be maximised working in collaboration with Central Bedfordshire, including accounting for the need to minimise impacts to / secure benefits for Woburn Sands. There are numerous landowners, which creates a delivery challenge, e.g. with a need for 'land equalisation'.
- N.B. Figure 6.1 (below) shows school / potential school locations in the area.
- 6.2.5. Finally, at **Olney** secondary school capacity is understood to be an issue and it is not clear what could be achieved (a modern campus of the Ousedale Academy is adjacent) although a bypass could support the town centre.
- 6.2.6. In **conclusion**, the preferred approach (Scenario 5) is considered to be highly proactive and is well considered in terms of addressing locational issues and opportunities. It is also recognised that a large amount of work has been undertaken regarding infrastructure strategy and planning. Focusing on the four sites that are a variable across the scenarios, all have the potential to deliver a primary school and there is the potential to deliver two secondary schools across these four sites. Also, two of the sites are located in close proximity to existing secondary schools (albeit not necessarily with spare capacity). Furthermore, ESCE, which is a constant across the scenarios, clearly has potential to deliver extensive strategic community infrastructure. However, the ambitious urban growth strategy, which is a constant across the scenarios, gives rise to challenges in terms of delivering new community infrastructure alongside new homes. Overall, there is a case for predicting a 'significant' positive effect for Scenario 5 but, on balance, a 'moderate or uncertain' positive effect is predicted ahead of further work on masterplanning, viability etc.

6.3. Air and wider environmental quality

1) PO minus S. Bow Brickhill, L. Gate, S. Dens	2) PO minus E. Wavendon	3) PO minus S. Bow Brickhill, L. Gate, S. Dens plus W. Olney	4) PO minus E. Wavendon plus W. Olney	5) Preferred option (PO)	6) PO plus W. Olney
3	4	2	2	2	 1

- 6.3.1. The appraisal aims to flag the potential opportunity at **Olney** where a town centre Air Quality Management Area (AQMA) was recently revoked, but where traffic through the town centre is understood to remain an environmental quality issue. Specifically, growth might assist with delivering a bypass (see Figure 5.5) albeit this is highly uncertain.
- 6.3.2. Also, the appraisal reflects a view that **expansion of Milton Keynes** is supported from an air quality perspective, given good potential for growth to be 'vision-led' in transport terms and, in this regard, there is particular support for East of Wavendon, which can link to one of the identified Metro Corridors. Expansion of Milton Keynes can be compared to expansion of most other towns in the sub-region, where there is typically at least one AQMA (e.g. there is an extensive AQMA affecting the centre of Bedford).
- 6.3.3. In **conclusion**, there is support for the higher growth scenarios, but it is not possible to predict effects of any significance, recognising that air quality is improving nationally, albeit pollution from particulate matter (PM) is set to increase as an issue.

6.4. Biodiversity

1) PO minus S. Bow Brickhill, L. Gate, S. Dens	2) PO minus E. Wavendon	3) PO minus S. Bow Brickhill, L. Gate, S. Dens plus W. Olney	4) PO minus E. Wavendon plus W. Olney	5) Preferred option (PO)	6) PO plus W. Olney
=	=	=	=	=	=

- 6.4.1. All of the variable growth locations are subject to a degree of onsite, adjacent or nearby constraint, perhaps most notably at **Olney**, where there is a need to factor-in the impacts of a bypass on River Great Ouse corridor. Also, **Shenley Dens** is closely associated with an important ancient woodland, and the proposed concept masterplan (shown below as Figure 6.2) does propose housing in close proximity to the woodland.⁸
- 6.4.2. However, in each case biodiversity concerns are of limited significance, with no clear concerns regarding locally designated Local Wildlife Sites (LWSs) let alone nationally designated Sites of Special Scientific Interest (SSSIs).
- 6.4.3. Broadly speaking, expansion of Milton Keynes does give rise to biodiversity concerns relative to potential strategic growth locations elsewhere in the sub-region, e.g. the north of Buckinghamshire is less sensitive, but it is nonetheless difficult to suggest a preference for **lower growth** scenarios.
- 6.4.4. In **conclusion**, it is not possible to differentiate between the growth scenarios with any confidence, nor to predict significant effects. The new emphasis on a high urban growth strategy is supported (albeit there are also some tensions with biodiversity objectives in respect of the Metro Corridors), and it is recognised that there will be much potential for the proposed greenfield strategic growth locations to deliver targeted green / blue infrastructure in line with an established strategy (a Local Nature Recovery Strategy is in preparation), but there is uncertainty regarding the significance of what can be achieved.

⁸ Oakhill Wood is a large ancient woodland that likely forms part of a wider ecological network when viewed at a landscape scale, including noting the key woodland cluster of Whaddon Chase to the south and woodlands to the east now enveloped within the urban area (there are two nationally designated SSSIs nearby within the urban area). However, it is mostly a replanted ancient woodland and is not designated as a Local Wildlife Site.

6.5. Climate change adaptation

1) PO minus S. Bow Brickhill, L. Gate, S. Dens	2) PO minus E. Wavendon	3) PO minus S. Bow Brickhill, L. Gate, S. Dens plus W. Olney	4) PO minus E. Wavendon plus W. Olney	5) Preferred option (PO)	6) PO plus W. Olney
=	=	=	=	=	=

- 6.5.1. Flood risk is the focus here and, by way of context, it is important to note that there is quite a high density of flood zones in and around Milton Keynes associated with the River Great Ouse and its tributaries. None of the variable growth locations intersect fluvial flood risk zones but most are associated with surface water flood risk (SWFR) channels/zones. The Environment Agency's consultation response in 2024 concluded "no major concerns" because risk could be "avoided through site design" but stated a residual concern ahead of concept masterplanning.
- 6.5.2. **Shenley Dens** appears to be least constrained, with only narrow SWFR zones that would not pose a challenge for effective masterplanning. West of **Olney** is then entirely unconstrained in and of itself, but there is a need to factor in the impacts of a bypass on the River Great Ouse corridor to the south. **Levante Gate** and **South of Bow Brickhill** are then associated with notable SWFR channels and areas of SWFR pooling adjacent to roads infrastructure, such that there could be a challenge for masterplanning, and downstream flood risk is a consideration, but it is not clear there are major concerns.
- 6.5.3. **East of Wavendon** is then constrained by a significant SWFR channel (and other areas of SWFR), and it is recognised that there are a range of competing masterplanning objectives. However, it seems likely that SWFR can be avoided as part of a green and blue infrastructure strategy, noting the proposed 15 ha District Park.
- 6.5.4. In **conclusion**, whilst it would not be appropriate to differentiate between the scenarios on the basis of modest flood risk concerns/challenges, it is fair to flag a 'moderate or uncertain' negative effect ahead of further consultation and masterplanning.
- 6.5.5. Finally, risk of urban overheating during heatwaves (likely to become more frequent) is a further climate change adaptation consideration, as is dealing with storm water in urban areas given a likely increase in the frequency and severity of storm events. It is not possible to differentiate between the growth scenarios in this regard, but it fair to suggest that high density growth in the urban area (particularly CMK) will create challenges. There is good potential to address issues through masterplanning (including green and blue infrastructure), design and construction measures. For example, best practice is being explored through the emerging the New London Plan.

6.6. Climate change mitigation

1) PO minus S. Bow Brickhill, L. Gate, S. Dens	2) PO minus E. Wavendon	3) PO minus S. Bow Brickhill, L. Gate, S. Dens plus W. Olney	4) PO minus E. Wavendon plus W. Olney	5) Preferred option (PO)	6) PO plus W. Olney
=	=	=	=	=	=

- 6.6.1. The focus of discussion here is the objective of minimising per capita greenhouse gas emissions from the built environment, recognising that transport is a focus of stand-alone discussion below. In this regard, there is support for **strategic growth locations**, which can be masterplanned to deliver on decarbonisation objectives. Masterplanning for renewable heat and power generation and storage can enable new communities that are not a net draw from the national grid over the course of a year (and minimise net peaks of demand on the grid during winter), and perhaps even generate a net surplus.

- 6.6.2. However, it is also the case that there will be competing masterplanning and wider policy priorities with major cost implications, for example transport infrastructure and affordable housing. This can and likely will limit the potential to masterplan for energy infrastructure and also the potential to design and construct houses to the highest standards in terms of heat efficiency (alongside internal comfort accounting for increasing risk of overheating risk due to likely increased frequency of heatwaves) and building level heat and power generation, which likely primarily means high efficiency heat pumps (e.g. ground sourced) and rooftop solar panels. Opportunities can and do go missed in practice, even at major sites that are a focus of detailed scrutiny.
- 6.6.3. It is noted that a strong development management (DM) policy framework is set to be applied, including: A) developments designed to achieve emissions standards over-and-above the requirements set out in Buildings Regulations (see further discussion in Part 2); and B) all strategic allocations are set to be required to: *“Provide an integrated network of low- and zero-carbon energy infrastructure from building scale to neighbourhood or district scale.”* However, uncertainties remain, ahead of further work including in respect of viability, and it is important not to place false comfort in policy. Matters are discussed further in Part 2 of this report.
- 6.6.4. A final consideration is methods aimed at minimising the ‘whole lifecycle greenhouse gas emissions’ of development, including the embodied emissions in construction materials. Large scale strategic growth locations can represent an opportunity for innovative methods, including potentially an element of modular construction. Given the scale of growth at MK to 2050, and also likely elsewhere nearby in the sub-region, there is a clear opportunity to consider a strategic approach to local supply chains.
- 6.6.5. In **conclusion**, whilst all scenarios would lead to a significant improvement on the baseline situation in respect of per capita emissions, which is one whereby growth continues to come forward but in a less well planned way with decarbonisation opportunities missed, there is also a need to factor in whether this improvement is *significant enough* given the urgency of the issue, as encapsulated in the commitment for the plan area to be net zero by 2030 and carbon negative by 2050. In this context there is a very high bar to predicting a positive effect under this topic heading and, on balance, a neutral effect is predicted. Finally, it is important to reiterate that transport decarbonisation – a key issue – is discussed below.

6.7. Communities

1) PO minus S. Bow Brickhill, L. Gate, S. Dens	2) PO minus E. Wavendon	3) PO minus S. Bow Brickhill, L. Gate, S. Dens plus W. Olney	4) PO minus E. Wavendon plus W. Olney	5) Preferred option (PO)	6) PO plus W. Olney
				2	2

- 6.7.1. There are many wide-ranging issues and opportunities that could be explored under this heading, building upon the discussion above in respect of accessibility to community infrastructure. However, on balance it is considered appropriate to focus on the risks of MK expansion being perceived as ‘unchecked sprawl’ with impacts to nearby communities. Whilst the expansion of MK has been strategically planned to a high degree over recent years and decades, and has largely been successful, the situation in this regard is not perfect, which can lead to community concerns regarding issues failing to be addressed and opportunities not being fully realised.
- 6.7.2. As part of this, a key matter that can be a focus here is the value placed by communities on green infrastructure and accessible landscapes around the edge of MK. In this regard, it is important to recognise that whilst there are no nationally designated landscapes, and relatively little in the way of wider national designations, landscapes around the edge of MK are highly diverse and sensitive at least in the sub-regional context. This varying sensitivity has factored strongly into spatial strategy / site selection, but concerns do remain across the variable options for **MK expansion**.

- 6.7.3. This is perhaps least the case for **Levante Gate** and **South of Bow Brickhill** because: A) these locations are strongly on the periphery of MK, separated from the current urban edge by industry and major infrastructure; B) there are limited concerns regarding impacts to nearby historic villages, assuming avoiding impacts factors in as a masterplanning priority; and C) there is a low density of public rights of way through / adjacent to these two sites. However, the effect of developing these two sites will be to dramatically change the relationship between the MK edge and the Greensand Ridge, which is a key feature and asset within the Oxford to Cambridge growth corridor.
- 6.7.4. In this light, it is considered appropriate to flag a possible preference for **lower growth** scenarios, mindful that there could feasibly be new settlement options to explore as a means of reducing pressure for MK expansion. Finally, with regards to **Olney**, an overall neutral position is taken, with it clear that there would be some communities / health opportunities to explore and it not being clear that there are any major concerns, but there would be a need for further work and consultation (which would mean a delay to the plan, which could then give rise to issues including for communities).
- 6.7.5. In **conclusion**, there is support for lower growth from a communities perspective, but this is tentative and concerns with the higher growth are not of any clear significance. It is important to note that the current preferred approach is more or less unchanged from that previously consulted upon in 2024, at which time communities were given an opportunity to comment on a full draft version of the local plan (i.e. a best practice approach). Over 600 representations were received, which is significantly more than for other recent local plan consultations, and this serves to generate confidence that communities have had the opportunity to input effectively to and influence the plan.

6.8. Economy and employment

1) PO minus S. Bow Brickhill, L. Gate, S. Dens	2) PO minus E. Wavendon	3) PO minus S. Bow Brickhill, L. Gate, S. Dens plus W. Olney	4) PO minus E. Wavendon plus W. Olney	5) Preferred option (PO)	6) PO plus W. Olney
=	=	=	=	=	=

- 6.8.1. The current plan document explains: *“Our focus is on supporting the **technology, digital and creative industries**, and we recently adopted the Milton Keynes City Technology Smart City Digital and Creative Industries Strategy 2024–2029.”* In this light, it is overall considered that there would be proactive approach to delivering new employment land under all scenarios. Further evidence is as follows:
- “One in every three jobs in the city is estimated to be in technology, and the creative industries sector has experienced strong growth in the past 10 years. Our strategy sets an ambition for a tech, design, and innovation quarter within Central Milton Keynes to establish a physical home for the tech sector. The city is already recognised as a leading UK Smart City, with its unique urban design allowing it to be used as a testbed for new technologies, including connected and autonomous vehicles... [and more].*
- A study by the Oxford to Cambridge pan -Regional Partnership in 2024 investigating the requirements of rapidly growing sectors of the local economy within the Oxford to Cambridge region... concluded that Milton Keynes had the highest proportion of regional digital technology jobs with jobs clustered in CMK and Linford Wood. Milton Keynes had also seen the biggest increase in employment in digital technology of any local authority area and in the period 2012/13 to 2022/23... the greatest amount of office floorspace was completed in Milton Keynes (35.9%). Milton Keynes has some life science employment but the focus for this in the region is Oxford and Cambridge.”*
- 6.8.2. As discussed in Section 5.3, there is a very significant unmet need for **warehousing and distribution** ('logistics') floorspace, which precludes the potential to predict significant positive effects here, but there are no reasonable options for boosting supply, at least through new allocations (as discussed in Section 5.3). A further possibility is policy support for redeveloping existing sites for logistics (see discussion in Part 2).

6.8.3. The plan document further explains:

“The logistics industry has exhibited strong growth in recent years, with many large warehouses constructed. In 2023, it employed 17,000 workers, 9.1% of all jobs in Milton Keynes City, significantly higher than the Great Britain average of 5%, indicating that Milton Keynes City has been a good location for this sector due to the M1 corridor and proximity to large markets in London and Birmingham. While demand in this sector remains strong, opportunities for further growth are diminishing due to the lack of suitable sites to accommodate the specific needs of this sector.”

6.8.4. Having made these introductory remarks, the key point to note is that none of the variable growth locations would be likely to deliver significant new employment land.

6.8.5. However, the growth strategy may help to deliver transport infrastructure upgrades that could help to unlock employment land options in Central Bedfordshire, with this notably the case for **East of Wavendon**. This is an important consideration, albeit one associated with wide ranging uncertainties, recognising that the Central Bedfordshire Local Plan is at an early stage of preparation and given the inherent challenges of long term strategic planning for major infrastructure upgrades (including planning for challenging Junction 13, e.g. with a need to factor in the Universal Studios proposal).

6.8.6. In **conclusion**, there is no clear basis for differentiating between the growth scenarios, albeit there is support for East of Wavendon and there is also support for providing for housing needs (with a view to ensuring a skilled local workforce) and a growth strategy that delivers on vision-led transport planning objectives. With regards to significant effects, whilst the strategy is considered proactive there is technically an unmet need.

6.9. Historic environment

1) PO minus S. Bow Brickhill, L. Gate, S. Dens	2) PO minus E. Wavendon	3) PO minus S. Bow Brickhill, L. Gate, S. Dens plus W. Olney	4) PO minus E. Wavendon plus W. Olney	5) Preferred option (PO)	6) PO plus W. Olney
4	2	3	1	4	3

6.9.1. Historic England did not raise any specific concerns with any of the variable growth locations through consultation in 2024, but commented:

“The plan is proposing significant expansion of the city over the coming decades via a high-level strategic approach. We infer much of the guiding detail will be established through the forthcoming supplementary planning documents (SPD). Noting policy GS11 (Principles for extensions to the city) supports continuation of the grid road system, redways and linear parks, clearly, a key challenge will be how best to expand this network into long-established rural areas, especially where there are historic settlements such as Moulsoe. The existing framework is largely very readable, but this readability is increasingly challenged as the city expands.... Of course, much of this detail will be developed over the years ahead. At this stage, our focus centres on the high-level heritage implications of these challenges. Some of these considerations have been picked up in... Landscape Character Assessment, but not all. We would welcome discussing plans for focused heritage assessment...”

6.9.2. This is a helpful statement that ties in with concerns discussed above under the ‘communities and health’ heading. However, it is important to be clear that the plan is proposing allocations that once in place will be ‘committed’, as opposed to a “high level strategic approach” and so the historic environment must factor in *now*.

6.9.3. In this light, it is appropriate to flag a concern with **East of Wavendon**, as there is a significant density of historic environment assets in this area, notwithstanding: A) this area is heavily influenced by modern MK edge and B) firm proposals to avoid and mitigate impacts including through a ‘Wavendon Strategic Buffer’ and a new District Park within the site. Much of this land was historically parkland (see [historic mapping](#)).

- 6.9.4. **Shenley Dens** is also constrained by a single listed farmhouse associated with a distinct position in the landscape, namely marking the transition from the Shenley Ridge to the Calverton Brook Valley, as experienced from public rights of way. However, it is noted that the farmhouse was substantially damaged by fire in 2024. **Levante Gate** and **South of Bow Brickhill** are then quite unconstrained in historic environment terms (although there are not-unrelated landscape sensitivities, discussed below), whilst **Olney** potentially represents an opportunity in terms of relieving traffic through the historic town centre, where there is a very high density of listed buildings.
- 6.9.5. In **conclusion**, there is support for higher growth, but it is fair to flag a concern with scenarios with East of Wavendon, particularly noting the Registered Park and Garden. Figures 6.1 and 6.2 show concept masterplans for the two more constrained sites.

Figure 6.1: Concept masterplan for East of Wavendon

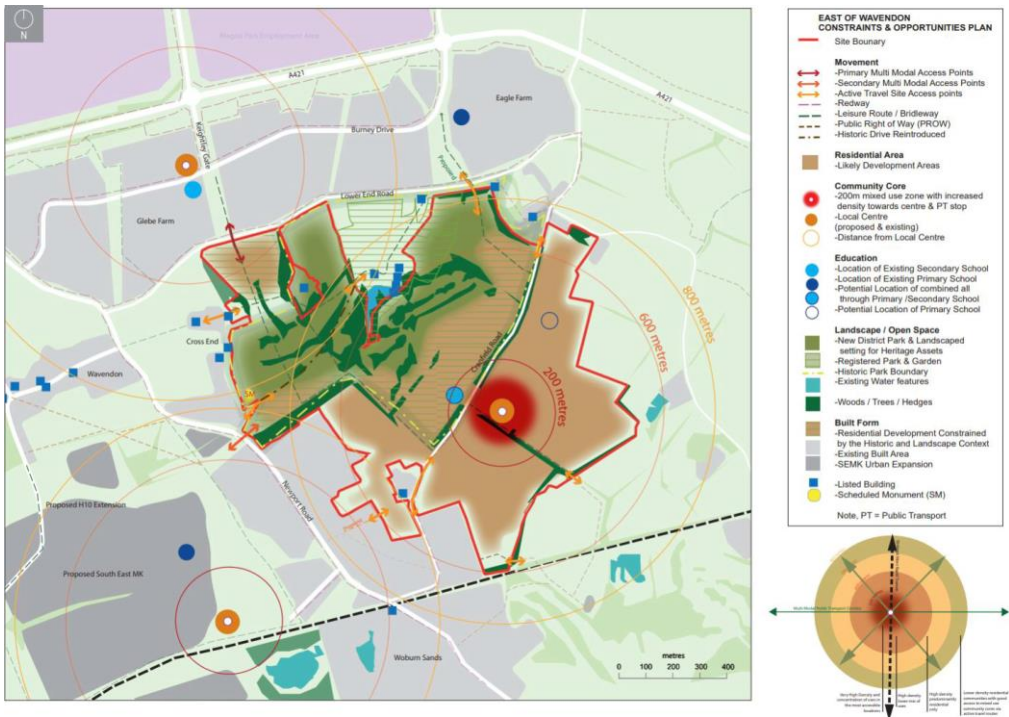
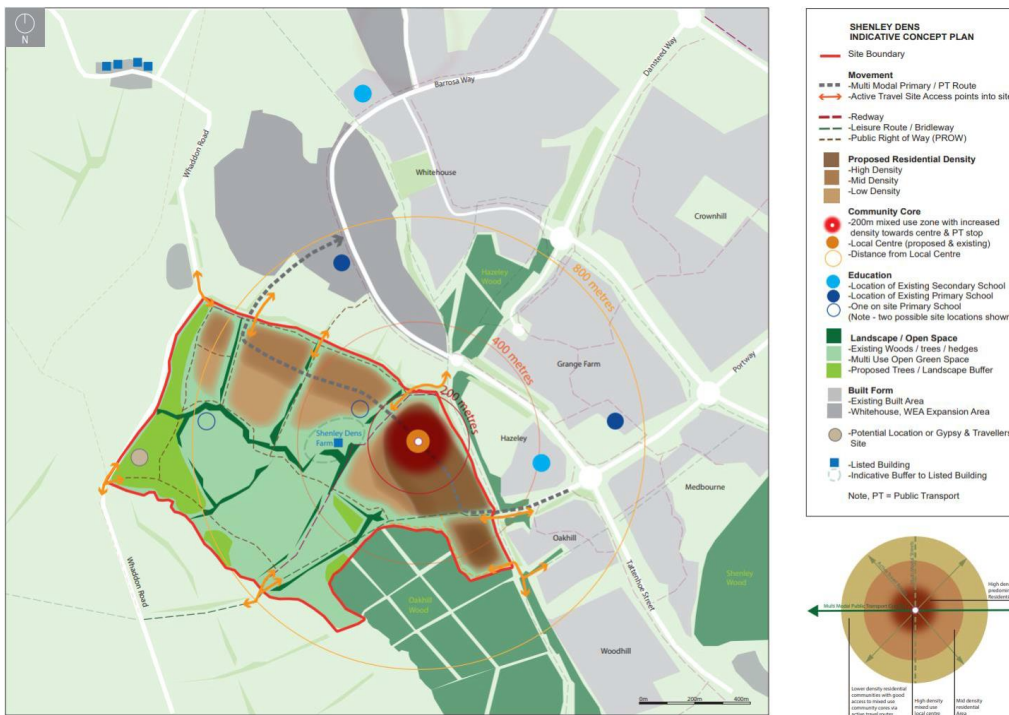


Figure 6.2: Concept masterplan for Shenley Dens



6.10. Homes

1) PO minus S. Bow Brickhill, L. Gate, S. Dens	2) PO minus E. Wavendon	3) PO minus S. Bow Brickhill, L. Gate, S. Dens plus W. Olney	4) PO minus E. Wavendon plus W. Olney	5) Preferred option (PO)	6) PO plus W. Olney
6	5	4	3	2	1 

- 6.10.1. Under all scenarios total plan period supply comfortably exceeds Local Housing Need (LHN), but there is still support for **higher growth** scenarios because: A) delivery risks suggest a possible need for a large supply buffer; B) there is a need to consider the requirement/supply balance not only across the plan period but also year on year across the plan period (avoiding the need for a stepped requirement); and C) higher growth scenarios could possibly enable some flexibility to set the housing requirement modestly above LHN to account for affordable housing needs and/or unmet need from elsewhere.
- 6.10.2. With regards to the merits of **specific variable sites**, all would be of a scale sufficient to deliver a good mix of homes, potentially to include specialist housing, and there is no reason to suggest that any would be at risk of not delivering the full policy quota of affordable housing (and a good mix of affordable housing, to include social housing).
- 6.10.3. **Levante Gate** is considered to be an important site from a housing perspective because it is expected to see its first completions in the 2028/29 monitoring year, such that it will contribute to 'five year housing land supply' at the point of plan adoption. Also, along with South of Bow Brickhill and Shenley Dens, Levante Gate benefits from strong development viability and therefore good potential to deliver affordable housing, as shown by Table 6.1. Specifically, the table shows that (on the basis of assumptions made regarding a range of policy asks, e.g. net zero development) South of Bow Brickhill, Levante Gate and Shenley Dens could deliver 40% affordable housing and also still make a £60,000 S106 contribution for each house delivered.

Table 6.1: Affordable housing v S106 contributions (Whole Plan Viability Study; HDH, 2025)

Affordable %	Walton Campus	Wolverton Works	ESCE	East of Wavendon	South of Bow Brickhill	Levante Gate	Shenley Dens
0%	£75,000	£70,000	£75,000	£75,000	£75,000	£75,000	£75,000
5%	£75,000	£60,000	£75,000	£75,000	£75,000	£75,000	£75,000
10%	£75,000	£55,000	£75,000	£75,000	£75,000	£75,000	£75,000
15%	£75,000	£45,000	£75,000	£75,000	£75,000	£75,000	£75,000
20%	£75,000	£35,000	£75,000	£75,000	£75,000	£75,000	£75,000
25%	£65,000	£25,000	£60,000	£70,000	£75,000	£75,000	£75,000
30%	£55,000	£15,000	£50,000	£60,000	£75,000	£75,000	£75,000
35%	£45,000	£5,000	£45,000	£50,000	£70,000	£70,000	£70,000
40%	£35,000	Unviable	£30,000	£40,000	£60,000	£60,000	£60,000

- 6.10.4. A further consideration is the possibility of local housing needs at **Olney**, although there is no reason to suggest that this is a particular issue plus (as discussed) there is the potential for the Town Council to allocate sites through a neighbourhood plan.
- 6.10.5. A final consideration is then **Gypsy and Traveller accommodation needs** (a key issue for many local plans) and, in this regard, a key point to note is that Shenley Dens can deliver 15 pitches. None of the other variable sites are known to have potential to deliver pitches, but this could be explored further. Strategic sites can be masterplanned to deliver pitches, but delivery is often delayed and there can be a risk of non-delivery.
- 6.10.6. In **conclusion**, there is clear support for higher growth scenarios, and there is a particular concern with the lowest growth scenario because: Levante Gate can deliver early; Shenley Dens can deliver pitches; and all three sites have strong viability. With regards to the highest growth scenario, this would be highly proactive in terms of housing supply but there would be residual concerns regarding pitch provision.

6.11. Landscape

1) PO minus S. Bow Brickhill, L. Gate, S. Dens	2) PO minus E. Wavendon	3) PO minus S. Bow Brickhill, L. Gate, S. Dens plus W. Olney	4) PO minus E. Wavendon plus W. Olney	5) Preferred option (PO)	6) PO plus W. Olney
	3	2	3	3	3

- 6.11.1. There is a clear need to flag a concern with scenarios involving the three MK urban extension options that would impact a Special Landscape Area (**SLA**). Most of these sites have a planning history as part of which concerns have been raised in the past; most notably Shenley Dens, where the 2005 the Local Plan Inspector concluded that a similar proposal: “... *would be visible from large parts of the Whaddon Valley. The Shenley Ridge is a significant feature in the landscape and I agree with the Llewelyn-Davies assessment that it is a feature that would form a logical and obvious boundary to development... I do not see the logic of regarding the Whaddon Valley as a possible long-term development area. To do so disregards the qualities of the valley landscape and the merits of the Shenley Ridge as a logical and clear long-term boundary.*” Work has been ongoing to consider capacity, development management policy and masterplanning principles for these sites, and the capacity of all three sites has been reduced significantly to account for landscape constraints, but concerns do remain.
- 6.11.2. **East of Wavendon** also has a degree of sensitivity, including noting the MK Boundary Walk, plus there is a need to factor in the position of historic settlements in the landscape (Wavendon, Woburn Sands and Apsley Guise); whilst at **Olney** avoiding the risk of ‘sprawl’ could be a concern, plus a bypass would impact the Ouse Valley SLA.
- 6.11.3. Finally, there is an opportunity to consider the concept masterplans for four of the five variable sites, namely all bar Olney. Two of these are presented above as Figures 6.1 and 6.2, and two are presented below as Figures 6.3 and 6.4. Taking each in turn:
- East of Wavendon – there is strong support for the strategic green infrastructure and a sensitive response to the setting of heritage assets. However, there is a clear need to consider a cross-border approach to green / blue infrastructure and landscape-led growth with a long term perspective, noting the proximity of Apsley Guise station and also the proposed location for a local centre towards the east of the site.
 - Shenley Dens – the proposed layout is supported from a landscape perspective, but it is noted that a corollary is growth focused in proximity to an ancient woodland.
 - South of Bow Brickhill – there is support for focusing higher densities on lower slopes and also the aspirational connections to the Brickhill Woods to the east. It is noted that land to the south is not proposed for allocation and this is rising / raised land.
 - Levante Gate – there is a need to carefully consider the southern / southeastern boundary, with a view to minimising concerns around further encroachment on the Greensand Ridge and/or sprawl to the south along the river corridor.
- 6.11.4. In **conclusion**, it is fair to flag a preference for the lowest growth scenario under this topic and to conclude a ‘moderate or uncertain’ negative effect under those scenarios that would see significant growth directed to an SLA. However, it is recognised that the lowest growth scenario could mean that the plan struggles to progress to adoption without additional allocations and any other allocation options could well be associated with landscape constraint (see discussion of other site options in Section 5.3).
- 6.11.5. Finally, it can be noted that landscape constraints were similarly acknowledged in 2024:
- “The Preferred Growth Strategy does entail growth in locations that are more landscape-sensitive, with growth directed to areas in the Brickhills and Calverton [SLAs]. Whilst this has been assessed as a potential negative against the SA objectives, landscape-led development in these locations could still occur without fundamentally undermining the landscape qualities that have led to their proposed designation as [SLA]....”*

Figure 6.3: Concept masterplan for South of Bow Brickhill

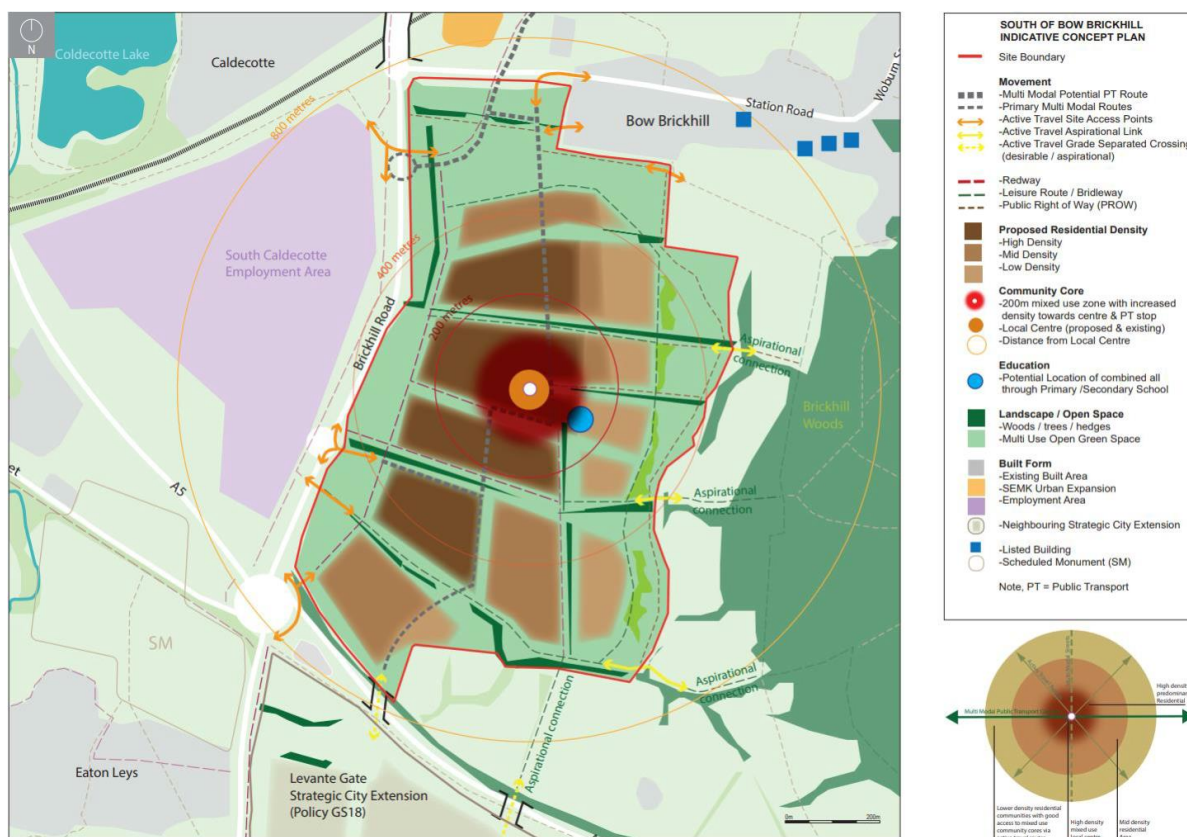
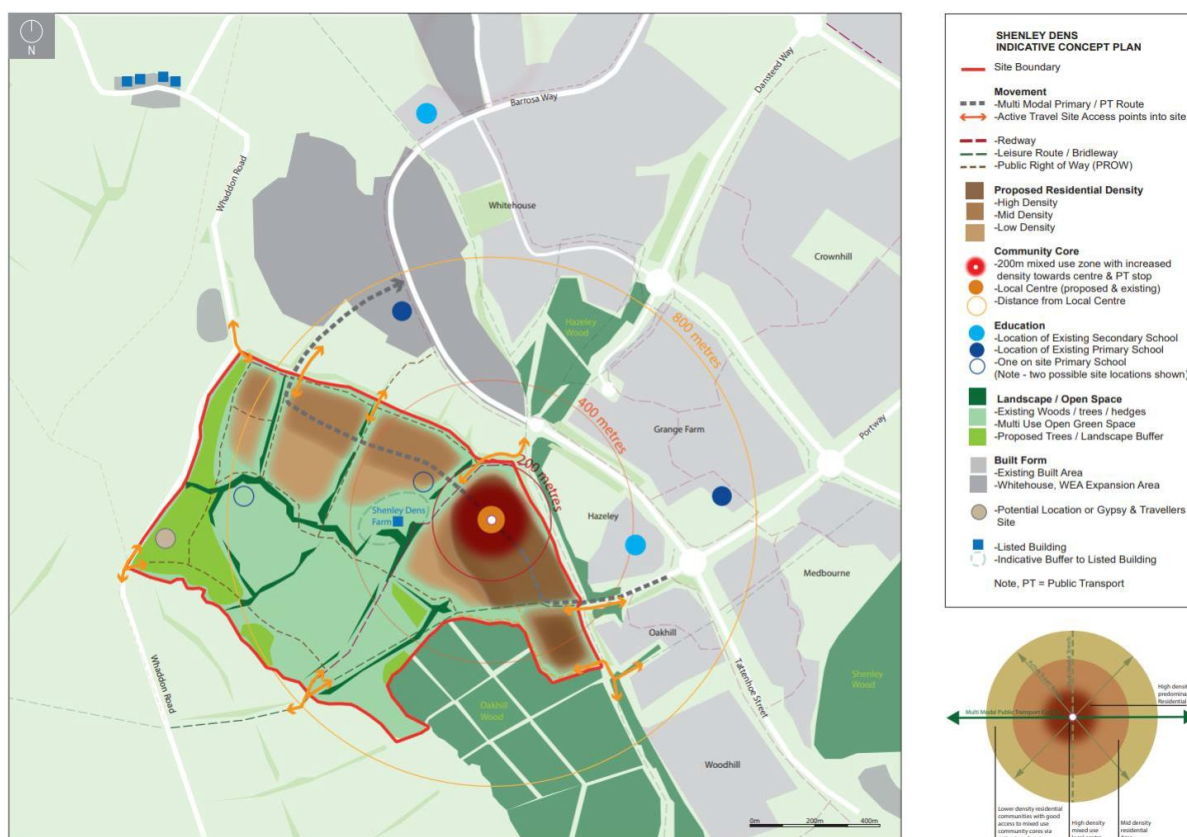


Figure 6.4: Concept masterplan for Shenley Dens



6.12. Resources

1) PO minus S. Bow Brickhill, L. Gate, S. Dens	2) PO minus E. Wavendon	3) PO minus S. Bow Brickhill, L. Gate, S. Dens plus W. Olney	4) PO minus E. Wavendon plus W. Olney	5) Preferred option (PO)	6) PO plus W. Olney
=	=	=	=	=	=

- 6.12.1. Whilst the previous Interim SA Report focused on the matter of supporting ‘sustainable waste management’, it is now considered appropriate to focus on the matter of avoiding/minimising loss of best and most versatile (BMV) agricultural land, which the NPPF classifies as that which is grade 1, grade 2 or grade 3a.
- 6.12.2. A first point to note is that the plan area is not particularly constrained in the sub-regional context, with Central Bedfordshire associated with a higher concentration of BMV land (including significant grade 1). Focusing on the edge of MK, agricultural land quality is higher to the **north** and **east** than it is to the **south** and **west**, whilst **Olney** is potentially associated with agricultural land quality that is similar to north/east MK (the available dataset is low resolution and low accuracy).
- 6.12.3. Unfortunately none of the variable sites have been surveyed in detail but adjacent land has been surveyed in several cases (surveying typically happens as part of the planning application process), and this generally suggests some potential for grade 3a quality land, but this is less the case for Shenley Dens (adjacent land is mostly grade 3b).
- 6.12.4. In **conclusion**, it is not possible to differentiate the scenarios with any confidence nor suggest that there are significant concerns with higher growth accounting for the sub-regional context and feasible alternative locations for growth (e.g. North MK). There is little if any guidance nationally regarding how to account for agricultural land quality as part of local plan-making, i.e. guidance on what constitutes a significant effect.
- 6.12.5. A final consideration under this topic heading is often avoiding the undue sterilisation of known minerals resources, but this is not known to be a key issue for the current plan.

6.13. Transport

1) PO minus S. Bow Brickhill, L. Gate, S. Dens	2) PO minus E. Wavendon	3) PO minus S. Bow Brickhill, L. Gate, S. Dens plus W. Olney	4) PO minus E. Wavendon plus W. Olney	5) Preferred option (PO)	6) PO plus W. Olney
2	3	2	3	1	2

- 6.13.1. Nationally there has been a recent shift to ‘vision-led’ transport planning that involves directing growth in order to minimise the need to travel and support modal shift away from the private car, and it is clear that this is a priority locally.
- 6.13.2. The **preferred approach** (Scenario 5) represents a strongly vision-led strategy in transport terms, with positive implications for wide ranging objectives, including decarbonisation (discussed above in Box 5.1).
- 6.13.3. Most notably, supporting a new MRT / Metro system is central to the growth strategy, as is significantly expanding and improving the Redways network, plus strategic growth locations can be masterplanned with transport as a central pillar (including potentially with a focus on driverless cars and delivery robots / drones).
- 6.13.4. However, there remain uncertainties in the absence of a sub-regional spatial strategy, particularly accounting for potential growth between MK and Bedford and the Universal Studios proposal south of Bedford, but also potential growth locations in Buckinghamshire, e.g. the challenging A421 linking to Buckingham and the M40.

- 6.13.5. On this basis it is appropriate to flag a ‘moderate or uncertain’ negative effect under all scenarios at this stage in the process, given evidence limitations (albeit this is inevitable in the context of local plan-making in the absence of sub-regional strategy).
- 6.13.6. With regards to specific growth locations, **East of Wavendon** is strongly supported in transport terms given proximity to East West Rail (EWR) and alignment with Metro Corridor ambitions (with potential to extend into Central Beds), and **South of Bow Brickhill** benefits from proximity to an EWR station and a location on the strategic road network such that there is alignment with bus strategy. **Shenley Dens** benefits from proximity to existing community infrastructure and also relative proximity to CMK. Finally, growth at **Olney** cannot be said to align well with vision-led transport strategy.
- 6.13.7. In **conclusion**, a ‘moderate or uncertain’ negative effect is predicted across all growth scenarios recognising the inherent challenge of strategic transport planning in the absence of an established sub-regional growth strategy. Most of the variable growth locations are supported in transport terms, such that there is not support for lower growth, but growth at Olney does not align well with a vision-led transport strategy.

6.14. Water

1) PO minus S. Bow Brickhill, L. Gate, S. Dens	2) PO minus E. Wavendon	3) PO minus S. Bow Brickhill, L. Gate, S. Dens plus W. Olney	4) PO minus E. Wavendon plus W. Olney	5) Preferred option (PO)	6) PO plus W. Olney
=	=	=	=	=	=

- 6.14.1. A key issue for local plan spatial strategy / site selection is typically strategic planning for wastewater treatment capacity, i.e. directing growth to locations with existing capacity or where growth might deliver or facilitate a capacity upgrade. However, the Environment Agency’s consultation response in 2024 touched upon this issue only briefly and instead focused more on water supply matters, i.e. supplying water without impacting the environment. On wastewater the EA commented:

“We were pleased to see... the detail around the locations and capacity of the [Wastewater Recycling Centres, WRCs], and storm overflows... We would also encourage discussion with Anglian Water to facilitate any necessary improvements to WRCs and the network to ensure there is sufficient capacity... It was good to see the understanding of Water Framework Directive legislation in relation to the local water environment and WRC effluent... We would encourage further development of mitigation measures to protect or improve the WFD status...”

- 6.14.2. Focusing on water supply, there is no clear case to suggest this is a barrier to higher growth, but sub-regional challenges warrant ongoing consideration. Strategic growth locations are well placed to achieve high water efficiency, although this is another policy objective with cost implications that must be balanced with competing priorities.
- 6.14.3. In **conclusion**, it is not possible to differentiate between the growth scenarios with any certainty and there are not known to be any major issues or opportunities to be realised such that a conclusion of ‘neutral effects’ is reached for all growth scenarios.

6.15. Appraisal summary

- 6.15.1. Table 6.2 presents a summary of the growth scenarios appraisal, with a column for each of the scenarios and a row for each element of the SA framework. Within each row, the aim is to **1)** rank the scenarios in order of performance (with a star indicating best performing and “=” used where it is not possible to differentiate with confidence); and then **2)** categorise performance in terms of significant effects using **red** (significant negative) / **amber** (moderate or uncertain negative) / **light green** (moderate or uncertain positive) / **green** (significant positive) / **no colour** (neutral).
- 6.15.2. There are three further introductory points to note:

- It is important to be clear that the appraisal is not undertaken with any assumptions made regarding the degree of importance ('weight') that should be assigned to each of the topics, such that the intention is not that the matrix should be used to calculate a total score for each of the scenarios (and, in any case, any attempt to do so is complicated by a need to account for both order of preference and significant effects).
- The appraisal discussion below focuses on the variables across the scenarios, but the two key constants – urban supply (including CMK) and ESCE – feed in to conclusions on significant effects. The constants are discussed further Part 2 of this report.
- The appraisal is an evolution from that in 2024, in that: the scenarios are adjusted, the appraisal framework is adjusted; there is new evidence to draw upon; and appraisal conclusions can differ on the basis of professional judgement.

Table 6.2: The reasonable growth scenarios – summary appraisal findings

	1) PO minus S. Bow Brickhill, L. Gate, S. Dens	2) PO minus E. Wavendon	3) PO minus S. Bow Brickhill, L. Gate, S. Dens plus W. Olney	4) PO minus E. Wavendon plus W. Olney	5) Preferred option (PO)	6) PO plus W. Olney
Accessibility	3	3	3	3	★1	2
Air / env quality	3	4	2	2	2	★1
Biodiversity	=	=	=	=	=	=
CC adaptation	=	=	=	=	=	=
CC mitigation	=	=	=	=	=	=
Communities and health	★1	★1	★1	★1	2	2
Economy & employment	=	=	=	=	=	=
Historic env	4	2	3	★1	4	3
Homes	6	5	4	3	2	★1
Landscape	★1	3	2	3	3	3
Resources	=	=	=	=	=	=
Transport	2	3	2	3	★1	2
Water	=	=	=	=	=	=

- 6.15.3. The appraisal shows a mixed picture, but it is immediately apparent that **Scenario 2** *potentially* performs poorly overall, as indicated by the fact that it is predicted to have equal fewest positive effects and equal most negative effects. East of Wavendon is a logical location for growth, most notably in transport terms including noting the possibility of future growth in Central Bedfordshire (subject to their own plan-making), but there are delivery challenges and uncertainties. The situation has improved (e.g. since the time of preparing Plan:MK, when the land was being promoted in a piecemeal fashion), but the remaining challenges / uncertainties mean that growth is not anticipated until post 2038.
- 6.15.4. It can also be noted that **Scenario 6** is the preferable scenario under the greatest number of topics (three), which is an indication of merit although, and to reiterate, it does not necessarily follow that it is best performing / best represents sustainable development. There is support for Scenario 6 as a higher growth scenario that would allow for a large 'supply buffer' and/or a modest boost to the housing requirement, and there is support for a bypass at Olney in several respects, but deliverability is uncertain.
- 6.15.5. Finally, with regards to **Scenario 1**, it is important to be clear that whilst the appraisal does not predict a negative effect under the 'housing heading', because total housing supply would still be above local housing need (LHN), this is marginal, because all three of the sites omitted from this scenario are of considerable importance, specifically: Levante Gate can deliver early (which is a key consideration, given the need to demonstrate a five year housing land supply at the point of adoption and then maintain this over the early years of the plan period ahead of a local plan review); Shenley Dens can deliver Gypsy and Traveller pitches (again, this is a key consideration as otherwise there would be a clear concern regarding providing for needs); and all three of the sites have strong development viability such they are well placed to deliver the full policy quota of affordable housing alongside delivering on wider policy asks.

7. The preferred growth scenario

- 7.1.1. The following text was prepared by MKC officers in response to the appraisal above:

The preferred approach is **Scenario 5**, which is considered to be justified, i.e. an appropriate strategy on the basis of proportionate evidence including the evidence provided by the appraisal of RA growth scenarios presented above.

Scenario 5 is shown to broadly perform well through the appraisal, striking a balance between boosting housing supply and responding to constraints and delivery risks. Scenario 5 is shown to be best performing with regard to 'accessibility' and 'transport', which are instrumental to responding to climate change through land use and creating people-friendly healthy places, and so considerable weight is given to these topics.

The appraisal of Scenario 5 highlights challenges and drawbacks, both in absolute terms and relative to alternatives, and these are all acknowledged and accepted, but Scenario 5 is considered to represent sustainable development on balance.

Scenario 6 is clearly shown by the appraisal to have a good degree of merit, and the broad case for remaining open to higher growth scenarios is acknowledged. However, there are deliverability uncertainties in respect of West of Olney (primarily infrastructure) and growth here would not align well with the vision-led transport strategy. Even if a bypass could be delivered for Olney, it would be challenging for this relatively modest scale of growth to deliver the wider necessary infrastructure, including a new secondary school and health provision

The landscape and/or historic environment case for lower growth scenarios is also acknowledged, but all of the sites in question (South of Bow Brickhill, Levante Gate, Shenley Dens, East of Wavendon) have considerable merit when viewed in isolation and as part of an overall strategy. The following statement from the Interim SA Report (2024) still holds true: *"Taken with the positive effects of these options, and on balance with other considerations, they represent sustainable options for growth..."*

Part 2: SA findings at this stage?

8. Introducing Part 2

8.1. Overview

- 8.1.1. The aim here is to present an appraisal of the current City Plan 2050 as a whole.
- 8.1.2. In practice, the appraisal builds upon the appraisal of Growth Scenario 5 presented in Section 6, specifically with added consideration given to:
- site allocations that are a 'constant' across the growth scenarios; and
 - thematic and site specific policies.
- 8.1.3. The appraisal here should be read in conjunction with that presented above in Section 6.

8.2. Introducing the plan

- 8.2.1. The plan document presents policies under the following headings:
- Growth strategy
 - Spatial strategy
 - Infrastructure first
 - Central Milton Keynes
 - Central Bletchley
 - People friendly and healthy places
 - High quality homes
 - Climate and environmental action
 - Economic and cultural prosperity
 - Heritage
- 8.2.2. The appraisal aims to focus on the proposed housing requirement and the proposed approach to spatial strategy, site selection and the supply of land for development over the plan period, whilst also considering how other policies will serve to mitigate the impacts of growth and ensure that growth-related opportunities are realised. This approach is taken because of the need to focus the appraisal on significant effects.
- 8.2.3. The key diagram has already been shown above (Figure 5.7), and the table below provides a further summary of the strategy for housing. A key point is that whilst 39% of existing supply (completions and commitments) comes from the urban area, 63% of the proposed new supply comes from the urban area.

Figure 8.1: Summary of the spatial strategy (also see Figure 5.7, above)

Existing supply	New urban growth locations	New Strategic City Extension (SCE)
Around 22,700 from completions and commitments (excl. CMK commitments)	16,000 in CMK and Campbell Park	7,750 Eastern SCE
	~ 3,000 Windfall sites within settlement boundaries (e.g. brownfield opportunity sites)	2,250 East of Wavendon SCE
	~2,500 in Metro route corridors	1,300 South of Bow Brickhill SCE
	~1,200 in Central Bletchley	1,250 Levante Gate SCE
	400 Wolverton Railway Works	1,000 Shenley Dens SCE
	400 Walton Hall	
~22,700 homes (38%)	~23,500 homes (39%, 63%)	13,550 homes (23%, 37%)

8.3. Appraisal methodology

- 8.3.1. Appraisal findings are presented across 13 sections below, with each section dealing with a specific sustainability topic. For each sustainability topic the aim is to discuss the merits of the City Plan 2050, as a whole, before concluding on significant effects.
- 8.3.2. Specifically, the regulatory requirement is to “identify, describe and evaluate” the significant effects of “the plan” taking into account the available evidence and also mindful of wide-ranging effect characteristics, e.g. effects can be short or long term, direct or indirect, and where an “effect” is a predicted change to the baseline situation, which is not simply a snap shot of the current situation, but also a projection of the current situation in the absence of the plan. As part of this, there is a need to recognise that housing growth locally would continue in the absence of the plan. The significance of any given effect is judged taking into account not only the magnitude of the predicted change to the baseline situation but also established objectives and targets (e.g. in respect of net zero). Every effort is made to predict effects accurately; however, this is inherently challenging given the strategic nature of the plan. The ability to predict effects accurately is also limited by knowledge gaps in respect of the baseline (both now and in the future). In light of this, there is a need to make considerable assumptions regarding how the plan will be implemented and the effect on particular ‘receptors’.
- 8.3.3. The appraisal aims to be systematic and to explain evidence/assumptions. However, there is also a need for conciseness and accessibility, for example noting that a Government Committee in 2022 emphasised a need to: “*streamline the current bureaucracy and overcomplication associated with... assessments.*” Also, in 2023 SA was described within a Government consultation as “... a nightmare... unintelligible...”

9. Appraisal of the MK City Plan 2050

9.1. Introduction

- 9.1.1. The appraisal is presented below as a series of narrative discussions under the SA framework / with reference to the SA scope (Section 3). Each narrative begins by recapping the preferred growth scenario (Scenario 5) appraised in Part 1 (Section 6).

9.2. Accessibility

- 9.2.1. The appraisal in Part 1 predicts a **‘moderate or uncertain’ positive effect** for Scenario 5 but acknowledges that there is a case for reaching a more positive conclusion (i.e. a ‘significant’ positive effect). In summary: A) the proposed strategic city extensions are strongly supported in terms of delivering new community infrastructure alongside homes (as most clearly evidenced by proposals / potential to deliver new schools including two secondary schools) but there remains a significant element of uncertainty; B) there are some inherent challenges associated with the high urban growth strategy, e.g. in terms of planning for schools capacity and also wider community and green/blue infrastructure; and C) there are no clear concerns with not allocating any sites in the rural area.
- 9.2.2. Overall, there is support for a plan that takes a strongly ‘infrastructure first’ approach, which the plan document describes as follows:

“... an ‘infrastructure first’ approach that ensures the necessary facilities (e.g. health, education and community) are provided for our residents as part of development. This includes reflecting the original design principles of the city in delivering new high-quality and accessible green spaces and play areas. We have prepared an Infrastructure Study and Strategy, including an Infrastructure Delivery Plan alongside the plan, which is a major element of the evidence base underpinning the strategy. We are also exploring alternative mechanisms which will create new ways of funding and delivering the infrastructure needed to support our city’s growth.”

- 9.2.3. An infrastructure first approach does not only relate to community infrastructure, but clearly this is a key broad category of infrastructure for any local plan, and the City Plan 2050 is no exception. Elaborating further, the plan document explains:

“To support growth in Milton Keynes City, we’ve identified a wide range of infrastructure types... These are backed by a detailed Infrastructure Study and Infrastructure Delivery Plan (IDP), developed with input from infrastructure and service providers. Our policies demonstrate the link between our strategic allocations and the infrastructure needs they will create. Our IDP shows these needs as a project pipeline.

We’ve also created an Investment Strategy, which sets out... how we will prioritise what infrastructure gets funded by development... This helps us keep infrastructure delivery viable, on track, fit for the future, and aligned with the pace of growth...

While the types of infrastructure we need are unlikely to change significantly, we know that priorities, funding sources and delivery methods may evolve. Our IDP provides a clear starting point for assessing each development and what needs to be provided. We will then assess each site against our delivery and funding priorities...”

- 9.2.4. These principles are then translated into Policy INF1 and INF2 in the plan, where INF1 applies to all developments and INF2 applies to strategic allocations. This is an important distinction, as there are some residual uncertainties and risks associated with non-strategic allocations in the urban area, including in light of Table 6.1 (above), which shows that viability challenges can limit the Section 106 (S106) contributions that can be made by challenging urban sites. On the one hand urban sites can draw upon existing infrastructure (where there is capacity); however, on the other hand, concentrated urban growth can give rise to a need for major upgrades to infrastructure which can be challenging and costly to deliver. At this point it can be noted that CMK has been shortlisted as a Government ‘New Town’ which could lead to major new funding streams. The New Towns Taskforce Report (2025) explains (emphasis added):

“Milton Keynes is known for its distinctive design identity, which has led to a perception of domination by the car, with ample, low-cost parking in the city centre being a particular feature. The low-density nature of the city centre has also contributed to a lack of vibrancy and activity, including in the night-time economy. Despite this, there has been a credible shift away from the city’s initial 1970s vision and now there is a population of almost 300,000 people, with renewed city standards for modern living. The initial sites will be well-served by a proposed mass rapid transit system.

*The **city centre inclusion** will create an engine to facilitate peripheral growth, providing the economic heart for the expanded city. **Government investment in infrastructure** could bring the transformational change required to give Milton Keynes a stronger sense of place and completely reshape the way people travel in the city by building a Mass Rapid Transit system. The city’s position in the Oxford-Cambridge Growth Corridor and its rail connection within the region through the East West Rail route will further enhance the local job market and the government’s growth strategy for the area.”*

- 9.2.5. Figures 9.1 and 9.2 seek to elaborate further, including with a prioritisation framework prepared in the knowledge that there are clear limitations to what can be funded.
- 9.2.6. With regards to specific strategic allocations, the site specific policies are considered strong in terms of setting out clear requirements, and the approach of including concept masterplans within the plan is strongly supported. This all serves to generate confidence that the sites can deliver in line with policy aspirations. There is also then further confidence on account of area-wide thematic policies including Policy GS4 (Strategy for people-friendly and healthy places), which notably presents clear requirements in respect of community facilities that are expected (see Figure 9.3).
- 9.2.7. With regards to CMK, confidence is generated by Policy CMK1 Central Milton Keynes Development Framework Area, including its approach of planning for distinct ‘quarters’ but it is noted that there is no discussion of planning for schools capacity.
- 9.2.8. In **conclusion**, the conclusion reached for Scenario 5 holds true for the plan as a whole.

Figure 9.1: Infrastructure Delivery Plan – breakdown of c.490 projects



Figure 9.2: Infrastructure Prioritisation – a framework approach

	Category A (Unlocking Sites)	Category B (Mitigation from early occupation)	Category C (Longer term policy priority)	Category D (Making a better place to live)
Description of Category	'We can't unlock / get development on site without it' - must happen to enable growth 'blockers' or 'showstoppers' - most common in relation to strategic (often city-scale or sub regional) transport and utilities infrastructure also includes Essential Services required to facilitate growth or be delivered in advance of residential / commercial development, i.e. connection to the potable water and wastewater network	'We can't get residents living on site without this' - required to mitigate impact arising from operation of development (i.e. from the point at which residents arrive) - unlikely to prevent development being built in short term - failure to invest could result in delays in development / occupation in medium term as capacity in facilities and networks is constrained - most common in relation to trip and population generated by the development - largely secondary infrastructure, after Category A	'We can't meet City Plan Priorities without this, and the site won't be sustainable longer term' - required to support wider strategic or site-specific objectives set out in planning policy or subject to statutory duty (unless already included in Categories A or B) - typically, not directly related to additional population (i.e. adding need per new person) - would not necessarily prevent development from occurring if not provided	'The site won't be a good place to live without this' - required for sustainable growth - unlikely to prevent development in short to medium term - often aligned to placemaking objectives - does not require previous enabling

Figure 9.3: Table presented within Policy GS4 Strategy for people-friendly and healthy places

Table 5. Framework of community facilities and catchment distances

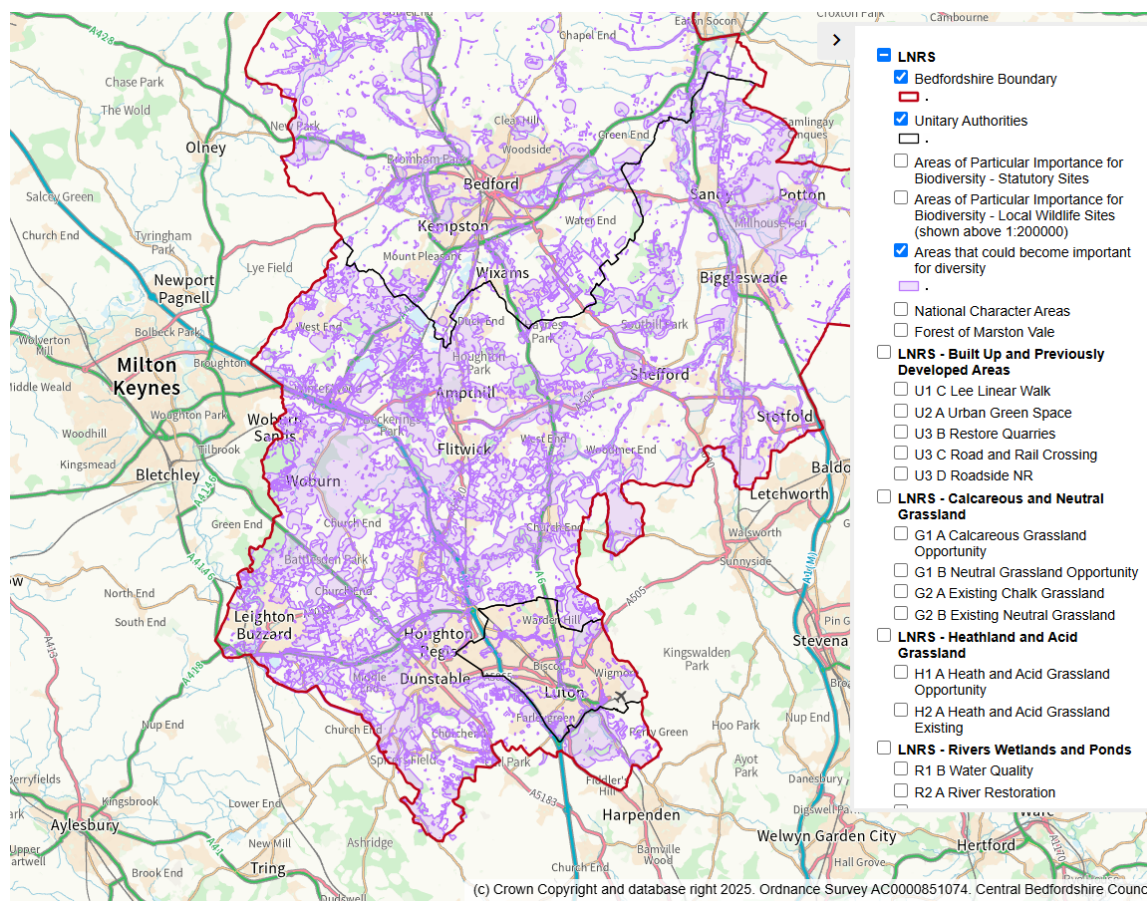
Community facility	Catchment distance from facility for majority of new homes (metres)
Bus stop and active travel stands	400 m
Open space	Various based on type (see Open Space Standards in Annex C)
Grocery shop	800 m
Primary health care facility/pharmacy	800 m
Nursery/Pre-school/Primary school	800 m
Allotments or other community food growing area	800 m
Community meeting places/multi-functional buildings (including meeting places/halls, cultural buildings, places of worship, libraries)	1,000 m
Indoor/outdoor recreation centre	1,000 m
Cafe	1,000 m
Public House	1,000 m
Local services (such as hairdressers, barbers, salon, launderette, post office).	1,000 m

9.3. Air and wider environmental quality

- 9.3.1. The appraisal in Part 1 predicts a **neutral effect** for Scenario 5 and there is limited potential to meaningfully elaborate. The proposed high urban growth strategy for Milton Keynes, both in terms of growth within the urban area and growth through strategic urban extensions, could feasibly give rise to some challenges, but there are not known to be any significant concerns. Whilst there are potential traffic congestion hotspots (subject to ongoing work), none are known to translate into a concern regarding air quality. It is recognised that air quality concerns nationally will persist into the future because electric vehicles generate particulate matter pollution on account of their weight, but as discussed there is clear potential to take a vision-led approach to growth from a transport planning perspective, namely one that serves to minimise car trips.
- 9.3.2. With regards to thematic policies within the plan, the key policy of note is Policy CEA7 (Mitigating wider environmental pollution), which sets out what is required of planning applicants and, as part of this, differentiates between applications for major development (10 more homes) and minor applications. The policy is locally tailored (recalling that the Government has committed to bringing forward National Development Management Policies, NDMPs) and considered suitably stringent, recognising that all such policy requirements can result in a degree of burden on applicants, potentially with implications for development viability and, in turn, ability to deliver on wider policy objectives including around infrastructure and affordable housing. Finally, it is noted that there is a strong focus on indoor air quality within the plan, which is an important factor in the context of proposals for net zero development with high standards of air tightness.
- 9.3.3. In **conclusion**, the conclusion reached for Scenario 5 holds true for the plan as a whole.

9.4. Biodiversity

- 9.4.1. The appraisal in Part 1 predicts a **neutral effect** for Scenario 5 but does flag some concerns/challenges, perhaps most notably in respect of Shenley Dens.
- 9.4.2. Focusing on ESCE – as the proposed strategic allocation that is less a focus of the appraisal in Part 1 because it is held constant across the scenarios appraised – there is a degree of concern around encroaching on ancient woodlands, and generally a landscape to the east of Milton Keynes associated with a notable density of woodland, including recognising the possibility of future expansion into Central Bedfordshire. However, not all of the woodland in this broad area is ancient woodland and none is locally designated as a Local Wildlife Site. It can also be noted that Moulsoe Old Wood is mainly replanted ancient woodland (which is not to suggest that it is not a significant and potentially sensitive ancient woodland). Moving forward, it will be important to consider alignment with the Bedfordshire Local Nature Recovery Strategy (LNRS), which identifies a high proportion of land east of Milton Keynes as a priority area.
- 9.4.3. With regards to the proposed high growth strategy for the urban area, this is broadly supported from a biodiversity perspective, particularly the very high growth strategy for CMK, but major intensification along Metro Corridors gives rise to degree of tension.
- 9.4.4. Finally, with regards to thematic policies, the key point to note is the proposal to require only the nationally standard approach to Biodiversity Net Gain (BNG), specifically 10% net gain (as measured using a national metric) as required under the Environment Act. In a number of parts of the Country local plans are requiring 20% (for example within Essex, informed by the Essex Design Guide) but there is a need to evidence/justify any such approach (including with evidence of available sites to deliver new or enhanced habitat to compensate for instances of development sites failing to achieve the requisite gain onsite) and there are cost implications and, in turn, implications for development viability. Moving forward, consideration could possibly be given to use of the Urban Greening Factor, which is widely applied across London and is also being taken up by some local plans outside of London; for example, the current Draft Southend Local Plan. There can also be benefits for wider green and blue infrastructure objectives.
- 9.4.5. In **conclusion**, the conclusion reached for Scenario 5 holds true for the plan as a whole.

Figure 9.4: Priority areas for biodiversity from the Bedfordshire LNRS⁹

9.5. Climate change adaptation

- 9.5.1. The appraisal in Part 1 predicts a **'moderate or uncertain' negative effect** for Scenario 5 but notes that this is a precautionary approach ahead of further consultation with the Environment Agency. The issue that is a focus of discussion above is significant surface water flood risk channels within certain of the strategic allocations, most notably East of Wavendon, but there is also a need to note here the challenges of a high urban growth strategy in terms of drainage and flood risk under climate change scenarios. Also, clearly overheating risk is a significant challenge for high urban growth, as discussed.
- 9.5.2. Focusing on ESCE – as the proposed strategic allocation that is less a focus of the appraisal in Part 1 because it is held constant across the scenarios appraised – there is an element of flood risk constraint, noting a network of tributaries of the River Ouzel that flow westwards through the site and then through the MK urban area. However, there will be excellent potential to mitigate risk through masterplanning and high quality sustainable drainage systems (albeit acknowledging there will be competing masterplanning and cost priorities). The scale of growth could suggest an opportunity to consider strategic flood storage and so a betterment to the flood risk situation.
- 9.5.3. None of the proposed site specific policies reference flood risk (it is noted that there are two references within policies for existing strategic allocations, including one requirement to achieve a flood risk betterment), but there are area-wide thematic policies, namely policies CEA13, 14 and 15. The requirements under these policies are mostly fairly standard (in the context of forthcoming National Development Management Policies, NDMPs), but there is a degree of local tailoring in respect of specifying which planning applications are required to include submission of a Flood Risk Assessment.

⁹ Screenshot taken from the Bedfordshire LNRS Habitat Map: <https://bedslocalnaturerecoverystrategy.commonplace.is/en-GB/proposals/local-habitat-map/start>

- 9.5.4. Finally, Policy CEA3 (Resilient design) is supported in terms of minimising overheating risk, but the policy is potentially fairly nationally standard. One option is to require the achievement of specific design standards (there are a number available to choose from) but it is acknowledged that any such policy risks overly constraining applicants.
- 9.5.5. In **conclusion**, the conclusion reached for Scenario 5 holds true for the plan as a whole.

9.6. Climate change mitigation

- 9.6.1. The appraisal in Part 1 predicts a **neutral effect** for Scenario 5. However, there is an argument for concluding a negative effect on the basis that decarbonisation is a national and local priority, and the Council has committed to achieving net zero by 2030.
- 9.6.2. Focusing on built environment decarbonisation, whilst spatial strategy and site selection is the most important consideration (as discussed in Part 1), there is also a crucially important need to consider development management (DM) policy, both area-wide and site specific. In particular, CEA1 (Sustainable buildings) is a key policy that requires scrutiny, as there are significant choices to be made regarding the degree to which built environment decarbonisation is seen as a policy priority in the context of competing priorities (e.g. infrastructure and affordable housing). In this regard, it is important to note significant changes to Policy CEA1. Specifically, whilst at the Regulation 18 stage there was clarity on the need to deliver net zero developments with performance measured using the Energy Use Intensity (EUI) approach that is widely favoured by industry specialists, the new proposal is to measure performance using Target Emissions Rate (TER) method that is employed under the Building Regulations. Overall there is perhaps now reduced confidence regarding delivery of net zero developments.
- 9.6.3. Finally, there is a need to consider ‘whole lifecycle’ carbon emissions, which includes ‘embodied’ emissions as distinct from the ‘operational’ emissions that are a focus of Building Regulations. Minimising embodied carbon is extremely important, but again there is a need to proceed with caution to avoid affecting site viability and delivery (including placing a particular burden on smaller developers / housebuilders). In this regard Policy CEA1 does include a set of principles but does not include any clear requirements. One possibility is to apply the approach advocated by the Essex Design Guide, which is to require “no demolition unless justified to the satisfaction of the LPA.”
- 9.6.4. In **conclusion**, the conclusion reached for Scenario 5 holds true for the plan as a whole. It is recognised that the previous appraisal in 2024 reached more positive conclusions, but the DM policy approach to requiring net zero developments has evolved significantly including in response to new evidence regarding development viability challenges.

9.7. Communities

- 9.7.1. The appraisal in Part 1 predicts a **neutral effect** for Scenario 5. It flags a potential case for lower growth, but this quite marginal, including recognising that if the plan does not take a sufficiently proactive approach to growth, then the risk could be that growth comes forward anyway but in a less well-planned / more piecemeal manner.
- 9.7.2. Focusing on DM policies – both area wide and site specific – there is overall strong support for the policy framework proposed (building on the discussion above under ‘Accessibility’), with it clear that “people-friendly and healthy places” is at the heart of the City Plan 2050, i.e. this is a matter that is being prioritised (in the context of competing priorities with cost and therefore viability implications). Key policies cover:
- Health Impact Assessment
 - Land uses that can detrimentally affect physical and mental health (hot food takeaways, betting shops, shisha cafes, etc.)
 - Provision of social infrastructure and community facilities in walkable distances
 - Food growing
 - Healthy building and street design

- Managing environmental impacts on health (e.g. air and noise pollution)

9.7.3. However, there are inevitably some residual tensions with communities objectives, including in respect of the proposed high growth strategy along Metro Corridors; specifically, the proposal is to take a cautious approach to growth with 2,500 homes assumed to 2050 but with potential for significantly higher growth in the fullness of time. There is clear support from an accessibility and transport perspective, but the loss of distinctive greenspace along grid roads does generate some concerns amongst nearby communities, plus there will be an element of ecological impact. A policy approach is set out to mitigate against some of these impacts (Policy GS9).

9.7.4. In **conclusion**, the conclusion reached for Scenario 5 holds true for the plan as a whole.

Figure 9.5: Proposed healthy place principles



9.8. Economy/employment

9.8.1. The appraisal in Part 1 predicts a '**moderate or uncertain**' positive effect for Scenario 5, but this is with much uncertainty as it is difficult to know what weight to put on the significant technical undersupply in respect of warehousing and distribution floorspace.

9.8.2. Given the challenges that existing in respect of finding new sites for warehousing and distribution, the proposed policy approach to supporting the redevelopment of existing employment sites takes on considerable importance. Options include policy support for:

- Redeveloping older industrial/warehouse sites with taller buildings to increase the amount of warehouse floorspace.
- Amalgamation of sites and replacement of older existing industrial /warehouse buildings to create a warehouse on a bigger site.
- Refurbishment of older existing buildings for warehousing, but I think the scope for that would be limited because of the need to accommodate new technology.

9.8.3. In **conclusion**, the conclusion reached for Scenario 5 holds true for the plan as a whole.

9.9. Historic environment

9.9.1. The appraisal in Part 1 predicts a '**moderate or uncertain**' negative effect for Scenario 5, particularly on account of the proposed allocation of East of Wavendon, which will involve some development within the registered park and garden (grade 2 listed). However, this conclusion reflects a precautionary approach given the proposed concept masterplan (Figure 6.1) and specifically the proposal for a new District Park.

9.9.2. Focusing on ESCE – as the proposed strategic allocation that is less a focus of the appraisal in Part 1 because it is held constant across the scenarios appraised – there are historic environment constraints, including noting the possibility of future growth within Central Bedfordshire – but overall there is confidence in the ability to masterplan with a view to avoiding and minimising impacts. This is evident from the Historic England quote presented above in Section 6.9.

9.9.3. The other key consideration for discussion here is then the proposed very high growth strategy for CMK, recognising that this was the primary focus of Historic England's consultation response from 2024, including the following:

“The city's origins lie in low density development, generous in scale, yet relatively low rise. This is well articulated in the Council's Statement of Significance for the New Town Register....: “The conventional wisdom of the time was for a modern city to have high-rise buildings, but MKDC deliberately chose a different model, that of low-rise buildings set in a spacious public realm and unified by infrastructure on a grand scale”. We are keen to support plans... while maintaining the city's distinctive grandeur.”

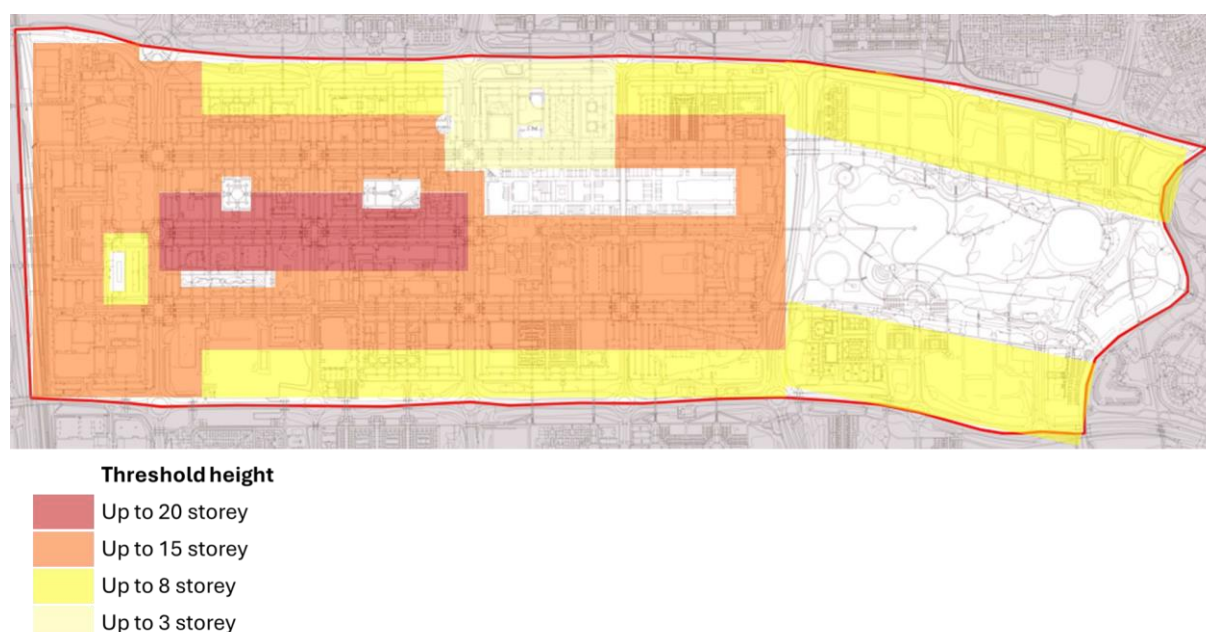
9.9.4. Work has been ongoing since 2024 and, amongst other things, there is now greater clarity regarding the strategy for tall buildings. Also, policy requirements include:

- Major planning applications, including tall buildings in CMK, are expected to undergo a design review process agreed through a Planning Performance Agreement (PPA).
- All proposals in CMK are expected to be of a high-quality design. However, proposals seeking to exceed height thresholds set out in the Central Milton Keynes Tall Building Strategy and/or those on gateway/key sites must meet a higher threshold and demonstrate an exceptional standard of design. This includes outstanding architectural form, quality and appearance that significantly enhances the city's identity and skyline.

9.9.5. There is also further confidence regarding the potential to avoid and minimise impacts on the basis of Policy HE1 (Heritage). However, there is little evidence of policy requirements being tailored to the specific MK context and, again, it is important to recall that National Development Management Policies (NDPMs) are forthcoming.

9.9.6. In **conclusion**, the conclusion reached for Scenario 5 holds true for the plan as a whole. Historic England will wish to comment further and then there will be the potential to make adjustments to the strategy through the Examination in Public.

Figure 9.6: Proposed CMK building heights



9.10. Homes

- 9.10.1. The appraisal in Part 1 predicts a **significant positive effect** for Scenario 5, because total identified supply over the (extended) plan period is 19% higher than local housing need (LHN). Also, in some regards the identified supply can be said to be conservative, e.g. with on assumed supply from large/major sites in the rural area (e.g. from neighbourhood plans prepared by town or parish councils). However, other than the headline matter of total supply over the plan period it is recognised that there are a range of further detailed matters to consider, including in respect of providing for affordable housing needs and Gypsy and Traveller accommodation needs.
- 9.10.2. Elaborating on the discussion in Part 1, matters to discuss here are as follows:
- CMK – it is important to recognise that there will be limited potential to deliver affordable housing and also family housing.
 - Affordable housing –
 - Requirements have been adjusted since the Regulation 18 stage, and the headline requirement is now: 40% in Housing Viability Area 1; 20% in Housing Viability Area 2; and 10% in Housing Viability Area 3. Specifically, there is now a reduced requirement for affordable housing in the lower viability areas including CMK.
 - However, the policy requirement in respect of tenure split has been made more stringent: 67% Social Rent; 20% Affordable Rent; 13% Affordable Home Ownership;
 - Overall, this should deliver around 15,000 affordable homes, which compares to the identified need for around 18,000, with around 85% for social or affordable rent.
 - Specialist housing – site specific policy for two of the strategic allocations reference a requirement to deliver specialist housing and then area-wide DM policies are proposed that are suitably supportive of windfall applications. Overall there is an element of uncertainty regarding the potential to meet established needs to 2050, namely:
 - 2,500 bedspaces for residential institutions (C2) such as care homes;
 - Around 5,800 sheltered homes for older people (4,500 owned and 1,300 rented);
 - Around 2,100 extra care homes for older people (1,500 owned and 600 rented);
 - Around 500 adults with severe mental illness at risk of requiring supported housing or housing with support;
 - Around 700 people with a learning disability who are at risk of requiring supported housing or housing with support; and
 - Around 1,450 places for young people leaving care.
 - Providing for Gypsy and Traveller accommodation needs – this matter has been a focus of discussion above, and overall there do remain some residual concerns particularly around the timing of pitch provision and delivery risks. There will be a need for further work to confirm that ESCE can deliver pitches by 2035 as proposed.
- 9.10.3. In **conclusion**, the conclusion reached for Scenario 5 holds true for the plan as a whole. However, it is important to reiterate that there are a range of issues and uncertainties including relating to the high urban growth strategy. There has been a need to make some compromises in the context of development viability limitations. However, it is worth noting again that the situation may improve if Milton Keynes is confirmed as a Government New Town.

9.11. Landscape

- 9.11.1. The appraisal in Part 1 predicts a predicts a **'moderate or uncertain' negative effect** for Scenario 5, and this conclusion is clear cut. There is a clear tension with landscape objectives given the proposal to support three strategic urban extensions that intersect an SLA, but concerns are of limited significance because SLAs are a local designation.

- 9.11.2. Focusing on ESCE, whilst this direction for MK's expansion gives rise to least concerns from a landscape perspective, there are nonetheless significant sensitivities, including relating to river/stream corridors, a network of ancient woodlands, historic settlements and generally a highly rural landscape. There will be excellent potential to avoid and mitigate concerns through masterplanning, and there will be major environmental planning opportunities to be realised (indeed there are likely cross-border / sub-regional scale opportunities to explore), but there are unavoidably some residual concerns. There is also a need to consider the extremities of the scheme from a perspective of avoiding sprawl, with a clear need for ongoing collaboration with Central Bedfordshire.
- 9.11.3. Finally, there is clear support for Policy CEA12 (Conserving and enhancing landscape character/Special Landscape Areas) and specifically the targeted policy criteria to guide future consideration of planning applications within the identified SLAs.
- 9.11.4. In **conclusion**, the conclusion reached for Scenario 5 holds true for the plan as a whole.

9.12. Resources

- 9.12.1. The appraisal in Part 1 predicts a **neutral effect** for Scenario 5 and there is limited potential to meaningfully elaborate. Clearly there is very strong support for the proposed high urban growth strategy in terms of minimising loss of greenfield land, although there is also a need for ongoing scrutiny of the proposed approach to making best use of existing buildings ahead of demolition where possible (as discussed above).
- 9.12.2. Focusing on ESCE – as the proposed strategic allocation that is less a focus of the appraisal in Part 1 because it is held constant across the scenarios appraised – whilst unfortunately none of the land has been surveyed to confirm agricultural land quality, the low resolution / low accuracy nationally available dataset shows the land here to be mostly grade 3 quality, such that it may or may not be best and most versatile (BMV), which the NPPF defines as land that is grade 1, grade 2 or grade 3a quality. Either way, there is a degree of support for ESCE in the knowledge that neighbouring areas within the sub-region are associated with extensive grade 2 quality land, most notably large parts of Bedfordshire and Cambridgeshire but also parts of Oxfordshire.
- 9.12.3. A further consideration is that ESCE does not intersect a Minerals Safeguarding Area.
- 9.12.4. In **conclusion**, the conclusion reached for Scenario 5 holds true for the plan as a whole.

9.13. Transport

- 9.13.1. The appraisal in Part 1 predicts a **'moderate or uncertain' negative effect** for Scenario 5 because, whilst there are a range of highly significant 'positives' there are also significant uncertainties (albeit this is inevitable in the absence of sub-regional strategy).
- 9.13.2. With regards to the key aspects of the spatial strategy that are less a focus of the appraisal in Part 1 because they are held constant across the scenarios appraised:
- CMK – the key requirements are: *“Development proposals should make provision for, and/or enhance, sustainable public transport, including Metro, and active travel to prioritise the use of the public realm for active modes of travel over private vehicles through: 1. Supporting the delivery of the Metro along Midsummer Boulevard; 2. Supporting the creation of a Greenway along Midsummer Boulevard... 3. Promoting inclusive and safe pedestrian links and routes through Central Milton Keynes Blocks and Blocklets; and 4. Supporting the creation of more inclusive and safe pedestrian links and routes to Campbell Park, including... a 'green bridge' from Midsummer Boulevard.”* This is a highly tailored approach and is strongly supported; however, it is important to strike a note of caution regarding cost and therefore viability implications.

- Metro Corridors – this strategy is overall highly supported in transport terms. There is a clear expectation that: *“Major development proposals within 600 m of existing or proposed interchange hubs within the Metro Corridors will only be supported where they: 1. Make efficient use of land within these highly accessible locations through higher-density development of up to 80 dwellings per hectare; and 2. Make provision for improvements to Metro infrastructure.”*
- ESCE – key requirements include:
 - Provision of, or planning obligations to help fund the delivery of, Metro-related infrastructure within the site and to facilitate Metro connections to the site.
 - Phased introduction of a comprehensive transport network that prioritises active travel and public transit modes including new and/or upgraded active travel and vehicular crossings of the M1.

9.13.3. Finally, key thematic policies to discuss are as follows:

- Policy GS10 (Movement and access) – one key requirement to note is the following: *“Development proposals that would introduce new crossovers or seek to remove sections of the Redway will be refused unless the proposal would create an alternate route and/or create a new crossover in a manner that would prioritise the active travel route and would not compromise the safety of the network.”*
- Policy GS11 (Adjacent and cross-boundary growth) – this is crucially important in respect of strategic transport planning. The policy presents the following high level principle: *“The local authorities will work jointly, and with infrastructure and service providers within Milton Keynes City as relevant, to achieve a coordinated and well-designed development, with engagement beginning as early as possible”*. It is recommended that ongoing consideration is given to future proofing ESCE in terms of avoiding strategic transport planning issues and realising opportunities sub-regionally.

9.13.4. In **conclusion**, the conclusion reached for Scenario 5 holds true for the plan as a whole. It is important to be clear that there are many highly positive aspects of the plan, including its focus on urban growth and large-scale strategic urban extensions at locations able to support Metro Corridors. However, there remain some significant uncertainties and risks, including recognising that such large scale growth to 2050 would ideally be undertaken in the context of a clear sub-regional growth strategy.

9.14. Water

9.14.1. The appraisal in Part 1 predicts a **neutral effect** for Scenario 5 and there is limited potential to meaningfully elaborate. Two points to note are:

- Proposals for fewer than 10 dwellings must achieve a 100 litres per person per day water efficiency standard for mains supplied water/potable water and proposals for 10 or more dwellings must achieve 93 litres per person per day.

This is a change from the Regulation 18 stage, when the proposal was that proposals for 10 or more dwellings must achieve 80 litres per person per day. This is a notable change recognising that the Environment Agency’s consultation response received in 2024 did focus on the matter of / water resource availability (as discussed in Part 1).

- Policy GS11 (Adjacent and cross-boundary growth) – states the following as a key principle: *“A strategic, integrated and sustainable approach to water resource management, including flood controls, drainage, water supply, foul sewerage and sewage treatment capacity shall be taken.”*

9.14.2. In **conclusion**, the conclusion reached for Scenario 5 holds true for the plan as a whole.

9.15. Appraisal conclusion

- 9.15.1. The conclusion of the 'whole plan' appraisal is as per the conclusion reached for Scenario 5 in Part 1. On balance it is not considered appropriate to 'boost' any of the appraisal conclusions reached for Scenario 5 on account of DM policies.
- 9.15.2. Specifically, the appraisal concludes: a significant **positive effect** under one heading (homes); a 'moderate or uncertain' **positive effect** under two headings (accessibility and economy); a neutral effect under six headings; and a 'moderate or uncertain' **negative effects** under four headings (climate change adaptation, historic environment, landscape and transport). No significant negative effects are predicted.
- 9.15.3. There will be the potential to make adjustments to the plan through the examination in public in order to improve the performance of the plan, albeit the remit/role of the Planning Inspector(s) will be limited. The appraisal highlights a number of specific matters that might be given further consideration; however, it is difficult to make specific recommendations, because any recommendation made with a view to improving the performance of the plan under one sustainability topic heading could have knock-on implications for performance under another heading. For example, it would be easy to recommend more stringent requirements in respect of affordable housing within the urban area, but there would be implications for wider objectives with cost implications.
- 9.15.4. Focusing on DM policy, moving forward it will be important to consider policy requirements in the round where they are associated with a cost for developers, with a view to striking the right balance between policy priorities (e.g. affordable housing versus infrastructure versus wider policy asks) in the context of development viability. It is important to be clear what is being prioritised and what compromises are being made / trade-offs accepted with a view to a 'whole plan' with good viability credentials and, in turn, minimal delivery risk (albeit delivery risk is reduced by a healthy supply buffer).
- 9.15.5. Finally, as part of SA there is a requirement to consider '**cumulative effects**', i.e. the effects of a local plan in combination with other local plans and other strategies. This has already been a focus of considerable discussion above, particularly the matter of close collaboration with Central Bedfordshire, Bedfordshire and Buckinghamshire.
- 9.15.6. This is both in terms of: A) detailed cross-border considerations, perhaps most notably in respect of ESCE; and B) broad strategy relating to housing, employment land, strategic transport, water resources and green and blue infrastructure (e.g. a 'Waterways Park' to Bedfordshire and/or a Calverton Valley Park). In respect of (B), one key matter for ongoing consideration is planning for strategic warehousing / distribution.
- 9.15.7. Planning to 2050 means that careful consideration must be given to not foreclosing or hindering future consideration of growth options in response evolving evidence and understanding. However, overall the MK City Plan 2050 is considered to represent a highly proactive approach to plan-making within a key nationally significant sub-region.

Part 3: Next steps

10. Plan finalisation

- 10.1.1. Once the period for representations on the Regulation 19 MK City Plan 2050 / SA Report has finished the aim is to submit the plan for examination in public alongside a summary of the issues raised through the Regulation 19 publication period.
- 10.1.2. Once found to be sound following examination the Local Plan will be adopted, at which time an SA 'Statement' will present prescribed information including "measures decided concerning monitoring".

11. Monitoring

- 11.1.1. As a nationally significant growth location it will be important to monitor and evaluate progress to inform both ongoing decision-making locally (including a future decision on reviewing the local plan) and national planning practice / strategy.
- 11.1.2. The Council already demonstrates good practice in a number of regards, e.g. housing delivery, and moving forward there should be a clear means of monitoring progress on new communities, employment land and strategic infrastructure.
- 11.1.3. There should also be a focus on gathering data to inform future local plan-making, including data on employment land needs, school capacity, Gypsy and Traveller accommodation needs and matters relating to water supply, wastewater treatment and the water environment. As part of this, there will be a need for ongoing consideration of sub-regional needs in respect of floorspace for strategic warehousing and distribution.
- 11.1.4. A bespoke framework for monitoring progress towards delivery of green and blue infrastructure / biodiversity net gain objectives could also be called for, aligning with the emerging Buckinghamshire and Milton Keynes Local Nature Recovery Strategy.

Appendix I: Regulatory requirements

As discussed in Section 1, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report. However, interpretation of Schedule 2 is not straightforward. Table A links the structure of this report to an interpretation of Schedule 2, whilst Table B explains this interpretation. Table C then presents a discussion of more precisely how the information in this report reflects the requirements for the SA Report.

Table A: Questions answered by this SA Report, in-line with an interpretation of regulations

Questions answered		As per regulations... the SA Report must include...
Introduction	What's the plan seeking to achieve?	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
	What's the sustainability 'context'?	- Relevant environmental protection objectives, established at international or national level - Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
	What's the SA scope?	- Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan - The environmental characteristics of areas likely to be significantly affected - Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
	What are the key issues and objectives that should be a focus?	Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
Part 1	What has plan-making / SA involved up to this point?	- Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) - The likely significant effects associated with alternatives - Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan
Part 2	What are the SA findings at this current stage?	- The likely significant effects associated with the draft plan - The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan
Part 3	What happens next?	A description of the monitoring measures envisaged

Table B: Interpreting Schedule 2 and linking the interpretation to the report structure

<u>Schedule 2</u>	<u>Interpretation of Schedule 2</u>
<i>The report must include...</i>	<i>The report must include...</i>
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes i.e. answer - <i>What's the plan seeking to achieve?</i>
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	<div data-bbox="774 459 1101 593">Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance</div> <div data-bbox="1117 459 1340 593">i.e. answer - <i>What's the 'context'?</i></div> <div data-bbox="774 593 1101 672">The relevant environmental protection objectives, established at international or national level</div> <div data-bbox="774 672 1101 761">The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'</div> <div data-bbox="774 761 1101 840">The environmental characteristics of areas likely to be significantly affected</div> <div data-bbox="774 840 1101 929">Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance</div> <div data-bbox="1117 672 1340 840">i.e. answer - <i>What's the 'baseline'?</i></div> <div data-bbox="774 929 1101 1041">Key environmental problems / issues and objectives that should be a focus of appraisal</div> <div data-bbox="1117 929 1340 1041">i.e. answer - <i>What are the key issues & objectives?</i></div> <div data-bbox="1340 459 1388 1041" data-kind="parent" data-rs="5">i.e. answer - <i>What's the scope of the SA?</i></div>
(c) the environmental characteristics of areas likely to be significantly affected;	
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	
(f) 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;	
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	<div data-bbox="774 1075 1101 1176">An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach')</div> <div data-bbox="1117 1075 1388 1176" data-kind="parent" data-rs="3"> i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report] </div>
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.
(i) a description of the measures envisaged concerning monitoring.	The likely significant effects associated with the draft plan i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan
	A description of the measures envisaged concerning monitoring i.e. answer - <i>What happens next?</i> [Part 3 of the Report]

Table C: ‘Checklist’ of how and where (within this report) regulatory requirements are reflected.

Regulatory requirement	Information presented in this report
Schedule 2 of the regulations lists the information to be provided within the SA Report	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 2 (‘What’s the plan seeking to achieve’) presents this information.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report. The outcome of scoping was an ‘SA framework’, which is presented within Section 3.
c) The environmental characteristics of areas likely to be significantly affected;	The SA scope – in terms of key sustainability issues and objectives, including accounting for evolution of the baseline without the plan – is then discussed within the appraisal sections as appropriate, i.e. in light of the options and proposals that are a focus of the appraisal.
d) ... environmental problems which are relevant... ...areas of a particular environmental importance...;	
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	The Scoping Report presented a detailed context review and explained how key messages from this (and baseline review) fed into the ‘SA framework’, which is presented within Section 3. Also, information on the SA scope is presented as part of appraisal work in Sections 6 and 9. With regards to explaining “ <i>how... considerations have been taken into account</i> ”, Section 7 explains reasons for supporting the preferred option, i.e. how/why the preferred option is justified in-light of alternatives appraisal.
f) 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.	Section 6 presents alternatives appraisal findings in respect of reasonable growth scenarios, whilst Section 9 presents an appraisal of the City Plan 2050 as a whole. All appraisal work naturally involved giving consideration to the SA scope and the various effect characteristics.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan...	Section 9 presents recommendations but perhaps more importantly flags ‘tensions’ that can be a focus of further work ahead of plan finalisation.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Sections 4 and 5 deal with ‘reasons for selecting the alternatives dealt with’, with an explanation of reasons for focusing on growth scenarios / certain growth scenarios. Section 7 explains ‘reasons for supporting the preferred approach’, i.e. explains how/why the preferred approach is justified in-light of the alternatives / scenarios appraisal. Methodology is discussed at various places, ahead of presenting appraisal findings.
i) ... measures envisaged concerning monitoring;	Section 11 presents this information.
j) a non-technical summary... under the above headings	The NTS is presented at the start of the report.
The SA Report must be published alongside the draft plan, in-line with the following regulations	
Authorities... 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...	This SA Report is published alongside the proposed submission City Plan 2050 in order to inform representations and then subsequent plan-making stages. Specifically, the next stage is expected to be examination in public.
The SA Report must be taken into account, alongside consultation responses, when finalising the plan.	
The environmental report prepared pursuant to Article 5 [and] the opinions expressed pursuant to Article 6... shall be taken into account during the preparation of the plan... and before its adoption or submission to the legislative procedure.	This SA Report will be taken into account when finalising the plan as part of the examination in public. It should also be noted that an Interim SA Report was published alongside the Draft City Plan 2050 in 2024 and that report, and responses received through the consultation, fed into work in 2025.

