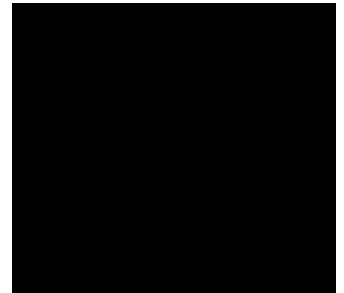


Date: 22 December 2025
Our ref: 535189



Milton Keynes City Council

BY EMAIL ONLY



Dear Sir or Madam,

Planning Consultation: Regulation 19 MK City Plan 2050

Thank you for your consultation on the above dated 07 November 2025.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England commented on the MK City Plan 2050 at the Regulation 18 stage in October 2024 (our reference 482812). Please refer to this previous comment alongside this response for further advice.

Natural England also provided advice on a Draft of the Habitats Regulations Assessment in September 2025 following a Teams meeting in July 2025.

Natural England welcomes the strong engagement we have had with Milton Keynes Council and the acceptance of our feedback.

Green and Blue Infrastructure

Natural England provided detailed comment on Green and Blue Infrastructure at the Regulation 18 stage. We welcome CEA10 as a strong policy for delivering Green and Blue Infrastructure.

Local Nature Recovery Strategy

Natural England welcomes the launch of the Buckinghamshire and Milton Keynes Local Nature Recovery Strategy (LNRS).

There is limited evidence that the LNRS has been integrated into the Local Plan and its draft policies. Relevant policies should include a requirement to consider how development is contributing to the nature recovery network and supporting the aspirations for the LNRS.

The Plan should clearly demonstrate how the LNRS evidence will be embedded in decision-making and how it will guide the location, design and environmental requirements of future growth. The approach undertaken should be detailed within the Local Plan policies.

Individual allocation policies should reflect the LNRS mapping, having full regard to the priorities and opportunities identified within the strategy. Allocation policies should aim to incorporate the potential measures set out within the LNRS into the design and layout of development so that nature is embedded from the outset and contributes to the creation of better, more resilient places.

Health and Wellbeing

The role that nature plays in supporting our health and wellbeing is increasingly well recognised across sectors and in the Government's Environmental Improvement Plan (2023). Green social prescribing is embedded within the NHS Long Term Plan, and Public Health England (now the Office for Health Improvement and Disparities) recommend that Local Authorities should consider local green and blue space to be critical assets for maintaining and supporting health and wellbeing in local communities (in their 2020 publication 'Improving access to greenspace'). The Department for Education's 'Sustainability and Climate Change Strategy' (2022) draws on learning in the natural environment for physical and mental health.

There is existing evidence that:

- Exposure to green space, particularly in urban areas, is associated with improved psychological well-being, physical activity and linked health outcomes.
- Exposure to nature increases activity levels among children and young people.
- Growing evidence shows that blue space exposure is also beneficial for psychological well-being and physical activity.

Nature-based interventions can result in psychological benefits, in particular reduced depression and improved mood. Evidence shows that access to natural green spaces can help reduce stress, fatigue, anxiety and depression, and boost immune systems and encourage physical activity. The risk of chronic diseases such as asthma may also be reduced. There is emerging evidence that a sense of connection to nature is correlated with certain wellbeing, educational outcomes, pro-environmental and pro-conservation behaviours which have important implications for society's action for climate change, the biodiversity crisis, or other environmental challenges.

A 2019 study found that people with a greater sense of connection to nature tended to have higher levels of wellbeing and higher levels of self-reported personal growth. A key finding from the 2-year 'test & learn' approach to delivering green social prescribing in Surrey Heartlands showed that nature and green space play a key role in health creation and the prevention of ill-health.

The Defra 25 Year Plan outlines nature-based actions that can be taken to help people connect to the natural environment to improve health and wellbeing. Such actions can include 'greening' our towns and cities, planting urban trees, encouraging children to access nature in and out of school and improving access for all in local green spaces.

It is estimated that the provision of parks and greenspaces across Britain saves the NHS at least £110 million a year solely through reduced visits to GPs, and their improved availability can help reduce health inequalities across society. A 2017 evidence review commissioned by Natural England found that that nature-based initiatives for people with mental health issues gave returns from £2.35 to £10.70 for every £1 invested.

The provision of enhanced green infrastructure and sites of nature conservation value can not only directly benefit individuals, but can also benefit society in other ways including improvements to local air and water quality, reducing the risk of flooding, alleviating noise levels and aiding climate change adaptation.

Green spaces also present an opportunity to improve local air quality, for example by increasing green space in built-up areas and giving access to clean air within greenspaces and parks. Natural England recommends the Local Plan sets out policy that seeks to enhance green infrastructure

and ecological connectivity across the District that is managed for people and nature. Local Plan policy could help achieve this by:

- Designing to improve access to nature; creating accessible green spaces to help everyone live within 15 minutes' walk of a green or blue space, in line with the Environment Improvement Plan target.
- Increasing access to nature-based health interventions. For example, supporting formal physical activities within green spaces, and community food growing through gardens/orchards.

Air Pollution

On the 16th October 2025 Natural England contacted all Local Planning Authorities to share our new approach to Air Quality consultations. For reference please see our updated standard advice below.

Local Plans are likely to generate increased emissions of nitrogen oxides (NOx) and ammonia, and additional nitrogen deposition as a result of increased traffic generation associated with new development. As impacts from individual development management proposals would be difficult to quantify without an overarching assessment of the cumulative impacts from Local Plan development, it is necessary for this to be considered strategically at plan level. Natural England would expect the environmental assessment of the plan including the Sustainability Appraisal (SA) and the Habitats Regulations Assessment (HRA) to consider any detrimental impacts on the natural environment from these emissions. It should also suggest appropriate avoidance or mitigation measures where applicable. Technical guidance about the ecological impacts from road transport can also be found in the Natural England research report 'The ecological effects of air pollution from road transport: an updated review' (NECR199).

Protected sites are 'sites of special scientific interest' (SSSIs) and 'habitats sites' (also called 'European sites'). For the purposes of this advice, Habitats Sites are Special Areas of Conservation (SACs), possible SACs, Special Protection Areas (SPAs), Potential SPAs, Ramsar sites, and sites identified, or required, as compensatory measures for adverse effects on Habitats Sites. Although their regulatory frameworks differ, the general principles and approach for air pollution assessment outlined for Habitats Sites are also relevant for SSSIs. Where the following advice applies to both, we use the term protected sites. Where the advice or approach differs, the individual terms are used. Habitats Sites and SSSIs at risk from local impacts are those within 200m of a road with increased traffic, which feature habitats that are vulnerable to nitrogen deposition and/or acidification.

Natural England provides the following standard advice on air pollution. This advice relates to the protection of protected sites under the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations) and the Wildlife and Countryside Act 1981 and should also be taken as Natural England's formal representation under the Town & Country Planning (Local Planning) Regulations 2012. This standard advice is applicable to all stages of the Local Plan process. This includes advice on information that is required to assess air quality and how to interpret the results of air quality modelling for your LPA to conclude whether air quality impacts would have an adverse effect on the integrity of a Habitat site or a SSSI. Detailed guidance on how to undertake a Habitats Regulations Assessment for air pollution impacts generated from traffic can be found here [Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations - NEA001](#).

You should also consider any relevant caselaw that could affect how you carry out any air quality assessments.

Air pollutants

This advice covers the following air pollutants:

- ammonia (NH₃)

- nitrogen oxides (NO, NO₂ or NO_x)
- nitrogen deposition
- acid deposition
- sulphur dioxide (SO₂)

Standing advice on air pollution and development is also available here: [Air pollution and development: advice for local authorities - GOV.UK](#)

Whilst the standing advice does not cover Local Plans, it does include additional technical advice which may prove useful. However, in summary, Table 1 in **Annex A** provides the steps that we advise should be taken by local planning authorities.

Strategic Allocations

We would strongly encourage that the LPA and developers consider how the strategic allocations can help to deliver nature's recovery at a landscape scale ensuring that connected green infrastructure links are embedded into the strategic allocations to connect people with nature in addition to creating a more resilient natural environment.

We would strongly advise that all strategic allocation policies create opportunities to deliver nature recovery and/or enhancement priorities identified in the LNRS.

We would welcome early engagement on strategic Green and Blue Infrastructure strategies and other associated environmental strategies as strategic allocations come forward.

Sustainability Appraisal (SA)

Natural England welcomes the adoption of our previous advice at the Regulation 18 stage into the Regulation 19 Sustainability Appraisal. Considering biodiversity, landscape, air quality, climate change mitigation and climate change adaptation as separate objectives is an effective means of assessing the proposed growth scenarios.

Your appraisal concludes that the Preferred Option would have a "moderate or uncertain negative" effect on climate change adaptation and landscape and a "neutral" effect on biodiversity, air quality and climate change mitigation.

Ideally, the Sustainability Appraisal should conclude that the Preferred Option has at least a neutral effect on biodiversity, landscape, air quality, climate change mitigation and climate change adaptation, and ideally a positive effect. Natural England notes that the likely effects on biodiversity, air quality, climate change mitigation and adaptation are similar under the other growth scenarios.

We note however, that the chosen growth scenario is one of the least favourable options for landscape and therefore Milton Keynes Council should work to ensure that any negative impact on landscape from the Local Plan's allocations are kept to a minimum. Natural England is aware that the most favourable option for landscape is the lowest growth scenario and as such may not be the most favourable option for the other Plan objectives.

Habitats Regulations Assessment (HRA)

Natural England provided advice on a Draft of the Habitats Regulations Assessment in September 2025 following a Teams meeting in July 2025.

Natural England notes that the Habitats Regulations Assessment (HRA) has not been produced by your authority, but by Lepus Consulting. As competent authority, it is your responsibility to produce the

HRA and be accountable for its conclusions. We are providing our advice on the assumption that your authority intends to adopt this HRA to fulfil your duty as competent authority.

Natural England concurs with the conclusion of this appropriate assessment that the plan will not result in adverse effects on the integrity of any statutory designated sites.

Upper Nene Valley Gravel Pits SPA/Ramsar

As outlined within Policies CEA9 and CEA10 of the draft Local Plan, Natural England would expect a project level Habitats Regulations Assessment to be conducted for proposals within 10km of the Upper Nene Valley Gravel Pits SPA and Ramsar.

We also welcome the commitment within Policy CEA10 that proposals that could potentially comprise functionally linked land associated with the Upper Nene Valley Gravel Pits SPA and Ramsar would need to undertake overwintering bird surveys early in the planning process ahead of submitting an application.

Yours faithfully,

Benjamin Leigh
Higher Officer - Sustainable Development
Thames Solent Team

Annex A – Air Pollution

Table 1: Sequential approach to air quality assessments

Stage	Step	Supplemental evidence/ basis for judgment
<p>Initial screening for credible risk of an effect</p>	<p>1</p> <p>Check Distance criteria - could significant emissions reach a protected site? Yes = move to Step 2 No = no further HRA required</p>	<p>The Air Pollution Information System (APIS) includes an introduction to air pollution.</p> <p>APIS provides site specific information on the interest features of individual protected sites and the sensitivity to air quality impacts of those features.</p> <p>For road traffic impacts, roads on the affected road network that lie within 200m of a designated site should be considered.</p> <p>Use Magic Map to check the location of designated sites. Search for the location then select the ‘Designations’ option.</p>
	<p>2</p> <p>Check if the qualifying habitats or supporting habitat of qualifying species are sensitive to air quality impacts. Yes = move to Step 3 No = no further HRA required</p> <p>APIS Site relevant Critical Loads and Levels (based on literature and professional judgement) http://www.apis.ac.uk/src/</p>	<p>The qualifying features of Habitats Sites can be identified in the relevant Site Conservation Objectives and Supplementary advice packages, which include a definitive list of legally qualifying features. These objectives are available here. Alternatively, a list of qualifying features can also be found by searching for the Habitats Site and SSSIs on Designated Sites View , alongside Conservation Objectives and Supplementary Advice for Habitats Sites.</p> <p>The above links will also show whether any of the qualifying features for Habitats Sites have a Restore or Maintain Conservation Objective in relation to air quality thresholds (critical levels or loads).</p> <p>If the site is a SPA or a SAC/SSSI designated for an</p>

			animal species (as opposed to a habitat), determine whether the predicted pollution effects on the supporting habitat will have a negative effect on the notified species.
Detailed AQ modelling	3	Undertake detailed modelling using a recognised dispersal model – i.e. Atmospheric Dispersion Modelling System (ADMS) - Roads Unless robust site-specific evidence is provided, we advise the lower range of the critical load should be used in modelling. If there are site specific reasons why it is more appropriate to use the higher end of the range, then this should be clearly evidenced.	Air Quality modelling for Local Plans should include relevant scenarios that are clearly identified. One such example of scenarios is a baseline plus future forecasts as follows: Baseline, future baseline (at end of plan period taking into account background trends for each pollutant), do nothing (without plan), do something (with plan). The Institute of Air Quality Management (IAQM) has produced the following document to assist its members in the assessment of the air quality impacts of development on designated nature conservation sites: air-quality-impacts-on-nature-sites-2020.pdf
Applying screening thresholds	4a	Apply Screening Threshold Alone If below threshold alone, move to step 4b. If above = move straight to step 5	Ascertain the Process Contribution (PC) from the plan or project (emissions and predicted deposition). Apply Screening threshold (1% of critical level or load) alone using the <u>annual averages</u> . If the process contribution is less than 1% of the relevant long-term benchmark (Environmental Assessment Level, Critical Level or Critical Load), the emission is not likely to have a significant effect <u>alone</u> irrespective of the background levels.
	4b	Apply Screening Threshold In-combination. If below threshold in-combination = no LSE/significant risk of damage etc and no further assessment required. If above = move straight to step 5	Use information from competent authorities (Planning Portal or Environmental Permitting register) to determine if there are plans or projects in the pipeline (not included in the current baseline) that should be considered in-combination for

			<p>emission from roads/ increase in traffic.</p> <p>For example, add emissions & deposition from other Local Plans together and apply 1% to that sum. If the process contribution is less than 1% of the relevant long-term benchmark (Environmental Assessment Level, Critical Level or Critical Load), the emission is not likely to have a significant effect <u>in-combination</u> irrespective of background levels.</p>
Detailed Assessment of ecological impacts	5	<p>This step is to consider the ecological impacts of AQ on the interest features of the designated site and is not based only on numerical figures.</p> <p>If it is not certain whether sensitive features are located within the areas to be impacted, a site visit may be helpful to determine this.</p> <p>For SSSIs, this step should provide all the information necessary, including any required mitigation, for the LPA to determine if there would be damage to a SSSI. Should damage to an SSSI not be ruled out, this will need consideration within the Local Plan Sustainability Appraisal and consideration of the tests of the NPPF (para 193b).</p> <p>If Habitats Sites are impacted by the proposals, move to Step 6.</p>	<p>The following information is likely to be helpful for the LPA:</p> <p>Is the sensitive feature(s) located within the pollution footprint? Should it be there for the site to meet its Conservation Objectives or is there some other, natural reason (e.g. hydrology), why the sensitive feature(s) would not be expected to occur there?</p> <p>Check APIS Trends Tab for reasonable expectation on whether background pollution may be decreasing or not.</p> <p>Assess likely scale and duration of impacts on habitats from emissions.</p> <p>Check whether any strategic initiatives in the area (such as shared nitrogen action plans) would be compromised by the proposals.</p>
Appropriate Assessment (AA) for habitats sites	6	<p>LPA to undertake their AA to conclude whether or not there will be an adverse effect on integrity (AEOI) of habitats sites. Any mitigation proposed by the applicant should also be assessed at this point.</p> <p>Should the AA conclude that the Local Plan would have an AEOI that cannot be excluded with mitigation measures, consider derogation route of the HRA process.</p>	<p>Where mitigation is required to enable a conclusion of no adverse effect on integrity to be reached the AA must be able to show that mitigation measures can be relied upon to avoid adverse effects over the full lifetime of the plan. To be viable, such measures should be effective, reliable, timely, guaranteed and of sufficient</p>

	<p>Should compensation measures be required under derogation, please contact Natural England for specific advice.</p> <p>Note: If an AA has been undertaken of the proposals <u>alone</u> and concluded that there will not be an adverse effect on integrity, if there are residual impacts that are not fully mitigated, these will need to be considered in combination with other plans or projects</p>	<p>duration. The assessment of such measures should be supported by evidence.</p> <p>When deciding on whether the proposals set out in the plan will have an adverse effect on Integrity on a Habitats Site, the Conservation Objectives and any supplementary advice should be taken into account. Including whether the site is already exceeding the environmental thresholds for ammonia, nitrogen oxides and nitrogen deposition and has a restore conservation objective.</p>
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Additional advice on air quality

For many protected sites, the current background pollution may already be exceeding the relevant critical load/level from a different source type to the project being assessed (e.g. the main source of background exceedance is due to agriculture, but the proposal is a road scheme). Proposals must consider their own impacts against the relevant environmental thresholds. There are many reasons why background levels are high, but the conservation objective is to ‘maintain or restore’ air pollutants to within these benchmarks. The objective would be undermined by proposals that add further emissions, including if it compromises any strategic initiatives to reduce air pollution levels.

Where an air quality report concludes that only a very small area of the site will be impacted, the assessment of effects on integrity or damage to the site, should take into account the interest features of the site, their distribution and how they will be impacted by proposals rather than on specific percentages of site. Dependent on features being present in the area to be impacted, this could have a disproportionate impact on the site if an area of a rare habitat type were lost rather than a judgement just on the percentages of habitat.

Improvements in vehicle technology and a move to further electrification of the vehicle fleet will, over time, result in lower background levels of nitrogen deposition and Nitrogen Oxide pollution near to roads. As most sites are currently over the relevant thresholds and have a “restore” objective, this should be noted as a “retardation” of the restore objective and expressed in months and years. Retardation of less than one year is acceptable as air quality is considered against an annual average. Please note that ammonia impacts cannot be assessed in this manner as there is no certainty of a declining trend.

Common Standards Monitoring¹ is used to define the ecological condition of a protected site. It is undertaken on a broader level and does not currently consider air quality impacts. The relevant benchmark for assessing impacts is the critical thresholds. Therefore, the existing status of a designated site should not be the sole reason for judgement on potential impact.

Defra Emissions Factor Toolkit

The Defra Emission Factor Toolkit (EFT) allows for gradual introduction of electric vehicles into the fleet (cars and LGVs) up to 2050. These are the emission factors we advise that Local Plans should be using (which we advise should also consider ammonia emissions as well as NOx – using one of three sets of emission factors available). However, the User Guide to the EFT highlights that calculation tools only support assessment years 2018 up to 2030, reflecting that predictions and assumptions beyond then become less certain. Where EFT calculated emissions are to be used after 2030 to inform air quality assessments, the EFT indicates that appropriate caveats around the limitations of the analysis

must be included to accompany the assessment.

We therefore advise that emission factors no later than 2030 are used for HRAs– which would mean percentages of EVs are at predicted 2030 levels. A key concern is that, although EVs themselves have no tailpipe emissions, and the percentage of them will increase, the remaining combustion engine vehicles on the road may become more polluting as they age as selective catalytic reduction technology may create ‘ammonia slip’ over time. Ammonia slip is the unreacted ammonia (NH₃) that escapes from a selective catalytic reduction (SCR) or selective non-catalytic reduction (SNCR) system used to reduce NO_x in exhaust gases.

Motorways within the affected road network

There is potentially an added complexity to the need for in-combination assessments when considering traffic on motorways, as including these roads can mean that the assessment takes account of traffic growth related to strategic factors or long range (external) trips that are independent of the specific plan or project and neighbouring plans or projects. These roads are strategically important and tend to have high volumes of traffic as well as being well represented in traffic models. The air quality assessment should therefore include traffic flows on these roads, but the external trips can be excluded from the initial screening assessment. A justification and explanation of which journeys are included and excluded in the traffic model should be provided. The conclusions reached on the air pollution impacts of the HRA must be incorporated into the wider HRA conclusions for other impact pathways identified for the local plan.