

# Chapter B

## Scope and Methodology

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# **Milton Keynes East Environmental Statement**

## **Chapter B: Scope and Methodology**

March 2021

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## **B1.0 Introduction**

- B1.1 This chapter describes the process undertaken to identify the likely significant environmental effects giving rise to the need for Environmental Impact Assessment ('EIA'). Individual chapters (Chapters D to O, the Cumulative Impact Assessment at Chapter P and the Mitigation and Monitoring Chapter Q) then describe the specific technical methodologies adopted to identify and assess the potential environmental effects arising.
- B1.2 The structure of this chapter is as follows:
- 1 Requirement for an EIA;
  - 2 A summary of the process of scoping the EIA with Milton Keynes Council ('MKC');
  - 3 A review of some of the overall difficulties in the process of assessment that have arisen in carrying out the EIA. Further detail is provided in Chapters D to O where relevant and applicable;
  - 4 The broad methodological approach taken for the assessment of potential environmental effects as part of this EIA with more details topic specific methodologies provided in chapters D to O; and
  - 5 An overview of the process of consultation which has taken place to inform and assist in the process of EIA.
- B1.3 The chapter should be read in conjunction with the following technical appendices provided at Volume 2 to this ES:-
- 1 Appendix B1 - EIA Scoping Report (2 October 2020); and
  - 2 Appendix B2 - EIA Scoping Opinion (30 November 2020) and accompanying consultee comments.

## B2.0 Requirement for an EIA

- B2.1 As described in chapter A of this ES, EIA is a process undertaken in respect of certain types of development prior to the grant of planning permission
- B2.2 The need for EIA derived from EU Directive No 2014/52/EU <sup>Ref 4</sup> on the assessment of certain public and private projects on the environment. The EIA Directive was first produced in 1985 as 85/337/EEC and has been amended several times since. The Directive was originally incorporated into UK planning legislation in Regulations issued in 1988 with further key updates in 1999 and (for some parts of the UK including England) in 2011.
- B2.3 On 16 May 2017, the Town and Country Planning (EIA) Regulations 2017 <sup>Ref 1</sup> came into force in England to incorporate the requirements of the 2014 Directive into domestic legislation. On 1 October 2018, minor amendments to the Regulations came into force in the form of the Town and Country Planning and Infrastructure Planning (Environmental Impact Assessment) (Amendment) Regulations 2018 <sup>Ref 2</sup>. This EIA has been carried out with regard to the requirements of the 2017 EIA Regulations as updated by the 2018 Amendment Regulations (together the ‘2017 EIA Regulations’).
- B2.4 On 31 January 2020 the UK officially withdrew from the European Union (EU). On that day, known as ‘exit day’ the Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 <sup>Ref 5</sup> came into force. The Regulations mean that there is no change to the way in which the 2017 EIA Regulations (as updated) are applied in England.
- B2.5 New requirements were published under the Town and Country Planning (Development Management Procedure, Listed Buildings and Environmental Impact Assessment) (England) (Coronavirus) (Amendment) Regulations 2020 <sup>Ref 3</sup>. These presently relate to the publication of documents up to the end of 30<sup>th</sup> June 2021.
- B2.6 This ES sets out the findings of an assessment of the potential for significant environmental effects of the Proposed Development(s) on the basis that the proposed development falls within Part 10(a), (b) and (f) of Schedule 2 of the 2017 EIA Regulations <sup>Ref 1</sup>.
- B2.7 Part 10(a) includes industrial estate development projects with a site area exceeding 0.5 ha; part 10 (b) includes urban development projects with more than 150 dwellings and part 10(c) includes developments involving the construction of roads on an area of works exceeding 1ha.
- B2.8 For Schedule 2 developments, the 2017 EIA Regulations <sup>Ref 1</sup> require that an EIA is undertaken where the development is *“likely to have significant effects on the environment by virtue of factors such as its nature, size and location”*.
- B2.9 Schedule 3 of the updated 2017 Regulations <sup>Ref 1</sup> contains ‘selection criteria’ to be used in determining whether Schedule 2 development requires an EIA. It identifies the characteristics of the development, the sensitivity of the location and the characteristics of the potential impact as the key *‘Selection Criteria for screening Schedule 2 Development’*.
- B2.10 An EIA has been conducted in respect of the Proposed Development due to its scale and location and the nature of the potential effects arising. It considers the likelihood of significant effects arising during the construction of the Proposed Development and during its operation. Where significant adverse effects on the environment are identified, the assessment process establishes mitigation measures to prevent, reduce and, where possible, off-set the effects and monitoring measures to ensure their ongoing delivery.

## **B3.0 Scope of the ES**

### **Request for an EIA Scoping Opinion**

- B3.1 To assist in identifying those environmental issues requiring consideration, the 2017 EIA Regulations <sup>Ref 1</sup> make provision for an applicant to seek the local authority's formal opinion on the scope of the EIA (the 'scoping opinion'). The scoping opinion identifies those issues that the local authority considers may give rise to the most significant effects and enables the applicant to focus on the assessment on those areas.
- B3.2 On 02 October 2020 St James Group Limited formally requested that MKC forms an EIA scoping opinion with respect to the proposed development. A copy of the request is provided at Appendix B1 (Volume 2 to this ES).
- B3.3 The request was made under Regulation 15 of the 2017 Regulations <sup>Ref 1</sup> which establishes the criteria which need to be provided to assist a relevant planning authority in forming a scoping opinion. Accordingly, a summary of the likely issues, the potential effects and the proposed methodology of assessment for the identified areas of interest accompanied the request in the form of an EIA Scoping Report. This contained a range of information so as to enable MKC to form an EIA scoping opinion.
- B3.4 MKC consulted with both internal and external consultees as part of the preparation of its EIA scoping opinion. MKC internal consultee comments received were integrated into the main scoping opinion text, as appropriate. MKC has confirmed that the list of external consultees from whom it received comments from prior to forming its scoping opinion are as follows:
- Newport Pagnell Town Council
  - Central Bedfordshire Council
  - Historic England
  - Natural England
  - National Grid
  - Cadent Gas
  - Canal and River Trust
  - Anglian Water
  - Environment Agency
- B3.5 Copies of the external responses received were viewed from the MKC planning register using the reference number 20/02484/ELASCO. Consultee comments published on MKC's website are provided at Appendix B2 (Volume 2 to this ES).
- B3.6 The scoping response confirms that the following officers/ organisation were also consulted or notified, but did not provide a formal response at the time of issue of the Scoping Opinion:-
- Highways England
  - Bedford Group of Internal Drainage Boards
  - Moulsoe Parish Council
  - Great Linford Parish Council
  - Ward councillors of Newport Pagnell South ward
  - Ward councillors of Broughton ward

- Ward councillors for Olney ward

B3.7

As specified in the scoping opinion (Appendix B2, Volume 2 to this ES), the scope of the EIA has also been the subject of discussion with officers at MKC and other statutory consultees and key stakeholders. Alongside issue of the scoping opinion, this has included the following meetings:

Table B3.1 Pre-Application Meeting Schedule

Pre-Application Meeting	Topic	Date
MKC Pre-App Meeting 1	1) EIA Scoping 2) Application Scoping (to be discussed/agreed by email prior to meeting) 3) Landscape/Flooding/Ecology	Thursday 28th May 2020
MKC Pre-App Meeting 2	1) Highways/Transport Modelling (WSP) - Highways Standards Sign-off - Aecom model sign off without development - Parking - Public transport discount strategy - PROWS 2) Masterplanning/Urban Design/Land Uses (JTP)	Tuesday 11th August 2020
MKC Pre-App Meeting 3	1) Flooding/Environment Agency (WSP) - Flood Risk - LLFA - Water Framework Directive 2) Landscape Strategy (HTA) 3) LVIA (Fabrik) 4) Archaeology/Heritage (RPS)	Tuesday 25 <sup>th</sup> August 2020
MKC Pre-App Meeting 4	1) Highways/Transport Modelling (WSP) - Highway Design Sign-off 2) Masterplanning/Urban Design/Land Uses (JTP) 3) EIA Scoping Report/Response (Lichfield's)	Tuesday 8 <sup>th</sup> September 2020
MKC Pre-App Meeting 5	1) Energy and Sustainability (Hodkinson) 2) Environment Health (WSP) - Air Quality - Noise Mitigation - Lighting - M1 bridge impact	Tuesday 22 September 2020
MKC Pre-App Meeting 5b	1) St James/ MKC Case Officer	Tuesday 6 <sup>th</sup> October 2020
MKC Pre-App Meeting 6a	1) Highways/Transport Modelling (WSP) 2) Masterplanning/Urban Design/Land Uses (JTP)	Thursday 13 <sup>th</sup> October 2020
MKC Pre-App Meeting 6b	St James/ MKC Case Officer	Thursday 29 <sup>th</sup> October 2020
MKC Pre-App Meeting 7	1) Landscape (HTA) 2) Ecology (H.D.A)	Tuesday 10 <sup>th</sup> November 2020
MKC Pre-App Meeting 8a	1) Masterplanning/Urban Design/Land Uses (JTP)	Tuesday 24 <sup>th</sup> November 2020
MKC Pre-App Meeting 8b	1) Highways/Transport Modelling (WSP)	Monday 30 <sup>th</sup> November 2020
MKC Pre-App Meeting 8d	1) Affordable Housing (St James)	Friday 11 <sup>th</sup> December 2020

Pre-Application Meeting	Topic	Date
MKC Pre-App Meeting 9	1) Landscape Strategy (HTA) 2) Open Space, Play and Recreation (HTA)	Tuesday 22 <sup>nd</sup> December 2020
MKC Pre-App Meeting 10	1) Environment Health - Lighting/Air Quality (WSP) 2) Retail/Leisure and Town Centre (Lichfields) 3) Health/Education (Lichfields) 4) Public Open Space/Play Space (HTA) 5) Masterplanning/Community Hub (JTP)	Tuesday 26th January 2021
MKC Pre-App Meeting 11	1) LVIA (Fabrik) 2) Heritage (RPS)	Tuesday 2 <sup>nd</sup> February 2021
MKC Pre-App Meeting 11a	1) Affordable Housing (St James)	Thursday 4th February 2021
MKC Pre-App Meeting 12a	1) Highways - Lighting (WSP) 2) Highways - Drainage Strategy (WSP) 3) Highways - A509 Crossings (WSP)	Wednesday 3rd March 2021
MKC Pre-App Meeting 12b	1) Arboriculture (H.D.A) 2) Parameter Plans (JTP)	Tuesday 9th February 2021

## The Scope of the EIA

- B3.8 In its formal EIA scoping opinion (dated 11 July 2019) (the ‘EIA Scoping Opinion’) (Appendix B2, Volume 2 to this ES), MKC acknowledged the general acceptability of the EIA Scoping Request (dated 30 November 2020) and confirmed that the EIA Scoping Opinion should be read in conjunction with the EIA Scoping Request as MKC’s formal Scoping Opinion.
- B3.9 The EIA Scoping Opinion confirmed that the EIA should address the following within environmental aspects: -
- Transport
  - Landscape and Views
  - Ecology/ Biodiversity
  - Air Quality
  - Noise and Vibration
  - Ground Conditions
  - Historic Built Environment
  - Archaeology
  - Flood Risk Drainage
  - Socio-Economic
  - Climate Change and Resilience
  - Waste
- B3.10 The EIA Scoping Opinion prescribes information for consideration as part of the EIA. In addition, it includes various information of relevance to the wider planning submission and consideration of the application more generally. Against this background, Table B3.1 below describes how this ES responds to the EIA Scoping Opinion and identifies where and how each issue has been addressed.



B3.11

In order to keep the ES as succinct as possible, Table B3.2 Response to MKC Scoping Opinion below only repeats information from the Scoping Opinion where it requires a response within this ES. A copy of the full Scoping Opinion is included within Appendix B2 (Volume 2 to this ES).

Table B3.2 Response to MKC Scoping Opinion

<b>Summary of Information from MKC Scoping Opinion (30.11.20)</b>	<b>Response as part of ES (March 2021)</b>
Page 1 to 3 [general preamble]	Comments of MKC noted by the applicant.
<b>Transport</b>	
The cumulative impacts on traffic and transport infrastructure as part of the MKE allocation are considered to be significant	Comments noted.
Significant modelling and transport assessment work has already been undertaken, and continues to develop during the pre-application stages, which is supported by the Council's Highways Officers.	Comments noted.
It is noted that formal comments have not been received by Highways England, although it is understood that discussions between the applicants and Highways England are ongoing regarding the transport modelling and impact on the strategic highway network. Given the strategic importance and likely impact of the site, the Council will continue to seek Highways England's formal view, and will forward this on once received.	See section 3.0 of Chapter D (Transport). This details the further discussions that have taken place with Highways England. To ensure that key stakeholders, such as Highways England, were consulted on relevant Transport matters, WSP submitted the Transport Assessment Scoping Notes alongside further Technical Notes to both MKE and Highways England and has subsequently provided additional information regarding any specific comments or queries raised. The TA (Appendix D1) sets out this additional information and correspondence. Ongoing discussions have therefore taken place with Highways England throughout the progression of the application to determine the scope of assessment for the TA, as well as the supporting modelling assumption underpinning the analysis. Subsequently, Highways England have confirmed that they are happy with the use of future baseline strategic models.
Consideration should also be given to the comments received from Central Bedfordshire Council, in relation to the assessment of routes towards Cranfield.	See section 3.0 of Chapter D. This addresses comments raised by Central Bedfordshire Council in the scoping and how addressed. In relation to the routes towards Cranfield these are included as off site junction assessments in the Transport Assessment (Appendix D1).
Subject to the above the approach set out in the Scoping Report is accepted.	Points raised have been fully addressed.
<b>Landscape and Views</b>	
The cumulative and standalone introduction of 4000 homes and associated infrastructure amongst the rest of the MKE allocation within the rural area is considered likely to give rise to significant landscape and visual impacts. MKE is likely to be visible from various vantage points due to the typography of the	Acknowledged.

<b>Summary of Information from MKC Scoping Opinion (30.11.20)</b>	<b>Response as part of ES (March 2021)</b>
land either side of the M1, and have a significant impact on the character of the area.	
The Council's Landscape Architect notes that the cumulative impact of the MKE allocation must be considered as part of a Landscape Visual Impact Assessment (LVIA).	This has been addressed in the Chapter E (Landscape and Views) and Chapter P (Cumulative Impact Assessment).
Detailed discussions regarding the scope of the LVIA have been ongoing during the pre-application stage regarding the appropriate views. Subject to the above comments, and the continued discussions at the pre-application stage regarding the detail of the LVIA, the approach set out in the Scoping Report is accepted.	Points noted have been fully addressed. Table B3.1 details ongoing discussions that have taken place on LVIA as part of the series of pre-application meetings with MKC. Further details of how these discussions, and other consultation, has shaped the detail of the LVIA assessment is set out in Section 3.0 of Chapter E (LVIA).
<b>Ecology / Biodiversity</b>	
The assessments to be undertaken on the existing ecology on the site is agreed. Use of the survey work to inform the masterplanning and location-based mitigation is agreed, as is the provision of a green infrastructure strategy for the site.	Noted.
The strategy must demonstrate a biodiversity offsetting approach to show a net gain using the appropriate biodiversity impact assessment metric and follow the mitigation hierarchy.	A Biodiversity Impact Assessment Metric has been submitted as part of the wider planning application submitted for MKE. Relevant points have been considered as part of Chapter F (Ecology)
Consideration and protection of ecology and biodiversity habitats during the construction phase will also be required.	Chapter F (Ecology) considers the potential effects on ecology during construction (and operational) phase(s). It includes commentary on 'in built' mitigation that will protect ecology as well as identifying any additional mitigation.
It is recommended that you consider the advice provided by Natural England in their consultation response for additional advice on the extent of information included in the ES.	The ecology assessment has been carried out with full consideration of Natural England's response is included at Appendix B2. The response from Natural England confirmed that ecology should be considered within the ES in accordance with CIEEM guidelines. It also refers to the need to consider internationally, nationally and locally designated sites. As well as protected species and Habitats and Species of Principal Importance and Ancient Woodland.
<b>Air Quality</b>	
Approach to air quality and odour assessment for operational and construction phases of the development supported.	Chapter G (Air Quality) has been prepared in line with this approach.
<b>Noise and Vibration</b>	
Approach to noise assessment for operational and construction phases of the development supported.	Chapter H (Noise and Vibration) has been prepared in line with this approach.

Summary of Information from MKC Scoping Opinion (30.11.20)	Response as part of ES (March 2021)
<b>Ground Conditions and Contamination</b>	
Approach to assessment agreed.	Chapter I has been prepared in line with this approach.
<b>Historic Built Environment</b>	
The approach for the Heritage Assessment, in particular taking into account the listed buildings in Moulsoe and the Grade II listed Holiday Inn building, is agreed. The potential impacts on those assets should be considered as part of the LVIA work, and further discussions should continue with the Council's Conservation Officer.	The Heritage Assessment work has been carried out in line with the scoping and fully addressing comments in scoping response. See Chapter J and Appendix J1. In line with the scoping response, the LVIA work has assessed the heritage assets specified in the scoping. See Chapter E and appendices. As required by the scoping discussions with the Council's Conservation Officer has continued. Further discussions took place on 2 February 2021.
<b>Archaeology</b>	
Comments from the Council's Archaeological Officer set out some concerns with the approach proposed as part of the Scoping Report, though it is understood that discussions are ongoing between parties to agree this approach. Provided that the comments from Archaeological Officer are taken into account, it is considered that the approach to archaeology within the ES (and as part of the application submission) can be agreed.	Since the Scoping Opinion, consultation has been carried out with Milton Keynes Archaeological Officer, Mr Nick Crank, who has approved the programmes of geophysical survey, fieldwalking and watching briefs, and the results of these have been reported directly back to him, to inform the consultation process. The comments from the Archaeological Officer have been taken into account in the approach to assessing archaeology. See Chapter K (Archaeology) and Appendix K1.
<b>Flood Risk Drainage</b>	
The Lead Local Flood Authority (LLFA) and Environment Agency consider the approach to flood risk and drainage as outlined to be acceptable.	Noted.
It is recommended you consider the detailed advice provided by the LLFA, for the extent of information required as part of the ES and application submission.	The advice of the LLFA has been taken into account. This is reflected in Chapter L (Water Environment and Drainage) and appendices.
<b>Socio Economics</b>	
The approach to baseline considerations and assessment as set out in the Scoping Report is agreed. As the proposal is part of MKE which is to effectively become a separate settlement in the borough, any considerations of socio-economic factors should be considered in light of the rest of the MKE allocation, and should consider integration between the developments being brought forward by the separate landowners/developers. Planning policy should be complied with in terms of mix, tenure and type of housing, and some coordination should be had between parties on the masterplanning work. Evidence should be provided within the application that the	These comments have been incorporated into the Socio Economic assessment (Chapter C) and cumulative impacts assessment (Chapter P). The ongoing collaboration between landowners/ developers is also dealt with more fully in the Planning Statement and Design and Access Statement submitted with the application.

<b>Summary of Information from MKC Scoping Opinion (30.11.20)</b>	<b>Response as part of ES (March 2021)</b>
education/local centre and other services provision proposed is sufficient for the likely future demographic make-up of the site, with consideration of the provision proposed in the remainder of MKE.	
<b>Climate Change and Resilience</b>	
The Council has made a commitment to reducing the borough's contribution to climate change and encouraging sustainability throughout the borough. Therefore, issues of sustainability, carbon neutrality and climate change are considered important topics that should be fully assessed, and the approach outline in the Scoping Report is agreed. Further information on the Sustainability Strategy should be covered elsewhere in the application submission.	The approach taken in Chapter N reflects the scoping report agreed. A Sustainability Statement forms part of the wider planning application submission setting out additional principles of the anticipated approach.
<b>Waste</b>	
The approach to the assessment of waste impacts and potential mitigation is agreed.	The assessment has been carried out accordingly and this is detailed in Chapter O.
<b>Other Matters</b>	
Agreement given to topics listed on (pages 84-86 ) in the Scoping Report that are not to be included in the ES but to be included in application submission.	This has been reflected in the scope of wider application submission documents.
<b>Conclusion</b>	
In taking account of the information provide, considering the specific characteristics of the development and the environmental features likely to be significantly affected by the development, it is considered that the key environmental issues have been identified within the Scoping Report submitted, and that no additional topics require covering in the Environmental Statement. The approach to the Environment Statement to be submitted with the planning application is therefore considered acceptable. Further discussions regarding the other supporting information required for the application (in accordance with the Council's Local Validation List and other national validation requirements) can be discussed during pre-application discussions. You are encouraged to review the consultee comments received, which contain specific and generic advice, and are available on the Council's public access website.	The information required for the submission has been considered by the applicant in line with these comments (along with other ongoing pre-application discussions set out in Table B3.1). The comments received from consultees have also been taken fully into account. These are included at Appendix B2.

## **B4.0 EIA Processes and Difficulties**

- B4.1 The EIA has considered the likely environmental effects based on current knowledge of the Development Site and surroundings, desk top assessments, surveys and fieldwork and information available to the EIA team. Regard is given to relevant national, strategic and local planning policy and other legislation of relevance to individual topic areas. The topic-specific guidance is considered within further detail within individual chapters of the ES.
- B4.2 The EIA has been completed with reference to best practice and relevant legislation and has addressed all those matters that could reasonably be required to assess the effects of development. This includes those arising from the scheme itself as well as those temporary effects arising during the construction phase.
- B4.3 An extensive amount of the information has been available to establish the baseline position for the Development Site and for consultation and assessment of the likely impacts by the EIA team. The development of the design has emerged from an iterative process of assessment and development between the design and EIA team, also taking into account consultation responses.
- B4.4 The project for which planning permission is sought incorporates those revisions or modifications that are necessary or appropriate to avoid or minimise significant adverse effects on the environment. Where 'built in' mitigation is taken into account in the technical assessments, this is identified.
- B4.5 Following the Council's formal consultation on the planning application and associated ES, new issues may emerge, or practices identified which may affect the findings in this ES. Throughout the ES, the difficulties in compiling information and testing impacts or the assumptions that have been adopted are noted explicitly.
- B4.6 General difficulties relevant to this ES are as follows: -
- 1 Information being unavailable to the team or the necessity to rely on reasonably available data in carrying out the EIA.
  - 2 Availability of accepted methodologies (e.g. there is no generally accepted criteria for assessing the significance of impacts on socioeconomics). In these situations, professional judgement, experience and agreement of other forms of assessment have been relied as the basis of EIA.
  - 3 Issues arising from the ongoing Covid 19 pandemic in 2020/2021 which may have affected the ability to survey, ability to engage with key stakeholders, or visit locations. Where specific issues are relevant to a particular technical aspect, these are identified in Chapters D to O of this ES.
- B4.7 Where technical limitations and difficulties have arisen on individual topic areas, these are identified in each chapter as appropriate.

## B5.0 **Methodological Approach**

### **General Approach**

- B5.1 The EIA has been prepared in accordance with the requirements of the updated 2017 EIA Regulations <sup>Ref 1</sup> and with reference to best practice including that published by the Institute of Environmental Management and Assessment (“IEMA”) <sup>Refs 6, 7 & 8</sup>. All information required to identify the likely significant environmental effects of the development, as defined by Schedule 4 of the updated 2017 EIA Regulations <sup>Ref 1</sup> has been provided as part of the ES. The ES also complies with Regulation 18(3), 18(4) and 18(5) which contain requirements for environmental statements.
- B5.2 The purpose of the ES is to ensure that information on the environmental issues associated with the Proposed Development, and any mitigation or monitoring required to address adverse effects, is set out in a form to assist in decision making and for stakeholders. Consideration has been given to effects during the construction and operation of the Proposed Development and including:-
- Construction – all works, activities and processes required in the demolition of structures, earthworks, preparatory works and the construction of infrastructure and buildings; and
  - Operation – impacts arising during the operation and occupation of buildings within the site.
- B5.3 The potential environmental effects have been assessed for each relevant aspect by comprising the existing and likely future environmental conditions (in the absence of the development) with the conditions that would exist if the Proposed Development is brought forward. The ES has been informed by desk studies, surveys, consultation and other investigations as recorded in Chapters D to O of this ES.
- B5.4 Due to the nature and form of the Proposed Development, which has an anticipated lifetime beyond 100 years, decommissioning effects are not relevant and have not been considered as part of this EIA.

### **Proposed Development Assessed**

- B5.5 The development assessed (comprising both strategic infrastructure designed in detail and also other outline elements) are described in Chapter C of this ES. Chapter C also describes the establishment of a series of maximum parameters that have been established to allow a worst case scenario assessment to be conducted and also sets out the construction parameters (including the phasing assumed for the purposes of assessment).

### **Embedded Mitigation**

- B5.6 As EIA is an iterative process intended to inform the development of the project design, certain mitigation measures which will reduce potentially significant effects have been built in or ‘embedded’ into the scheme design. Chapters D to O of this ES identify specific measures arising from the assessment of each particular technical aspect that have identified any such embedded mitigation. These are then summarised in Chapter Q of this ES.
- B5.7 Best practice measures for mitigation will be followed when considering the methods for dealing with the environmental impacts of the Proposed Development. In addition to this, and where relevant, the EIA has also sought to identify opportunities for environmental enhancement.

## Assessment of Effects

- B5.8 The 2017 EIA Regulations <sup>Ref 1</sup> require the identification of the likely adverse or beneficial significant environmental effects of the Proposed Development. This is based on a consideration of the magnitude of the predicted impacts and the sensitivity of the affected receptor. The process by which effects have been identified and their significance is provided as it relates to the specific methodological approach to assess each technical aspect in Chapters D to O of this ES. However a general description is provided below.
- B5.9 Certain topics have deviated from the standard methodological approach and structure of assessment in order to adhere to relevant guidance and practice. Where this is relevant, explanation is provided in the relevant chapter.
- B5.10 The baseline conditions for each chapter comprise those which exist at present (the date of this ES). Each chapter also includes a description of a 'Future Baseline' which is what would be expected to occur in the future if the Proposed Development did not proceed. Most assessments compare the situation with the Proposed Development in place with the current baseline conditions. Certain assessments also provide an assessment against the 'Future Baseline'. Where this is the case this is described in the relevant technical aspect chapter.
- B5.11 The ES includes a clear description of the likely significant environmental effects on the environment including direct/indirect effects, secondary, cumulative, short/medium/long term, permanent/temporary and beneficial/adverse effects arising from the development. In particular, the assessment of impacts has had regard to the following:-
- The magnitude of the impact (i.e. its extent, duration, frequency and severity);
  - The sensitivity of a particular receptor to a given impact (i.e. including its adaptability or the degree to which it can avoid or adapt to an impact; how tolerant it is to accommodate a particular impact; how it can recover following an impact; and how valuable, rare or important a receptor may be); and
  - The probability or likelihood that an identified impact might occur (adopting a precautionary or worst case approach where necessary).
- B5.12 The identified effects have then been classified by reference to a common list of EIA significance criteria, comprising:-
- 1 Major/Substantial<sup>1</sup> beneficial
  - 2 Moderate<sup>2</sup> beneficial
  - 3 Minor<sup>3</sup> beneficial
  - 4 Negligible
  - 5 Minor<sup>3</sup> adverse
  - 6 Moderate<sup>2</sup> adverse
  - 7 Major/Substantial<sup>1</sup> adverse
- B5.13 Each technical chapter D to O relates the above criteria to its own specific methodological assessment approach and provides a clear statement on which are considered 'significant' in EIA

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1 Major/Substantial - considerable effects (by extent, duration or magnitude) or of more than local significance or breaching identified standards or policy

2 Moderate - limited effects which may be considered significant

3 Minor - slight, very short or highly localised effects

terms. Generally, impacts identified as major/substantial or moderate are considered significant. However where a particular aspect deviates from this, this is stated.

B5.14 Predictions of impact are based on the best available data using a combination of professional judgement, expert knowledge and modelling where needed. Assumptions or limitations made in the assessment are specifically noted in Chapters D to O; this includes an explanation of any strategies taken to address known limitations.

B5.15 Mitigation measures that are identified with specific ES Chapters, and the mechanisms for monitoring their effectiveness, are consolidated and set out in a coordinated manner in a dedicated Chapter within the ES (Chapter Q). This is provided to assist MKC in forming its reasoned conclusion on the planning application for MKE.

### **Structure of Technical Assessments**

B5.16 The assessment includes a consideration of relevant policy and legislation of relevance as well as considering comments received by consultees during the pre-submission period.

B5.17 Each technical assessment follows a consistent approach and format: -

- 1 Brief review of relevant policy and legislative context;
- 2 Confirmation of the detailed topic specific assessment methodology, consultation undertaken and confirmation on how the assessment relates to the standard significance criteria adopted for the EIA (see below);
- 3 Consideration of Baseline Conditions including an identification of sources of information, site history, current environmental conditions and future trends/anticipated changes to current conditions that could be anticipated without the scheme;
- 4 Identification of the potential effects including a summary of those resources/receptors likely to be affected, the sensitivity of those receptors to accommodate change; the degree of change resulting from the Proposed Development; the change of events or pathways linking cause to effect and a prediction of the significance of effects in terms of nature, extent and magnitude including whether it is direct/indirect, short/long term, permanent/temporary, beneficial/adverse;
- 5 The scope for incorporating mitigation measures to avoid, reduce, remedy or compensate
- 6 for any identified effects; and
- 7 Identification of any effects remaining after mitigation.

B5.18 The effects which could arise when the Proposed Development is considered as part of the wider MKE allocation (as described in Chapter A of this ES) and also alongside other developments within the wider area. These cumulative effects are described in Chapter P of this ES. A summary is also provided in Chapter P of any effects which may occur due to the inter-relationship between different impacts arising from the Proposed Development (or 'synergistic effects').



## **B6.0 Consultation and Engagement**

- B6.1 In accordance with the National Planning Policy Framework (Section 3) the detail of the Proposed Development has been subject to engagement and discussions with MKC and local stakeholders prior to the submission of the planning application. This consultation has influenced the emerging design proposals and informed the application.
- B6.2 Detailed engagement with key stakeholders with the ability to inform the process of EIA has been undertaken in the context of each technical area and is described in Chapters D to O of this ES. This section outlines how consultation has also influenced the form of development alongside the process of EIA as part of an iterative process.

### **Engagement with MKC and other Key Stakeholders**

- B6.3 The proposed redevelopment of the site has been the subject of a constructive, inclusive and responsive pre-application design and development process since 2014. Details of the process are also provided within a Statement of Community Involvement which has been submitted in support of the planning application to assist MKC in its consideration of the Proposed Development.
- B6.4 The process of engagement with MKC and other key stakeholders started with the preparation of the Plan:MK 2019. This has involved ongoing consultation from 2014 - 2018. The principle of a Sustainable Urban Extension of around 5,000 homes, 105ha of employment uses, and strategic highways infrastructure at MKE was extensively consulted upon as part of the development of the Local Plan.
- B6.5 MKC also undertook extensive consultation in relation to the MKE Development Framework SPD (2020). This included Statutory Consultees and members of the public.
- B6.6 A series of pre-application planning performance agreement ('PPA') meetings have taken place between May 2020 and February 2021, these are detailed in Table B3.1. These covered a range of departments and disciplines, focusing on different masterplanning, design, placemaking, highways and other issues relating to the hybrid application.
- B6.7 Meetings/correspondence has also taken place with the following key stakeholders and statutory consultees:
- 1 Milton Keynes Parks Trust
  - 2 Highways England
  - 3 Milton Keynes Clinical Commissioning Group
  - 4 Environment Agency
  - 5 Anglian Water
  - 6 Historic England

### **Response to Process of Engagement**

- B6.8 The applicant and the project team have sought to ensure that issues raised during the process of consultation relating to the EIA have been incorporated into the scheme as part of the iterative process. Key changes to the design which have taken place prior to submission are summarised at Chapter C (Site and Scheme Description) of this ES and more detailed consideration is provided in individual technical aspect chapters of the ES (Section 3.0 of each chapter).

- B6.9 In terms of engagement with the local community, the public consultation involved a 20 page consultation brochure that as delivered to over 26,600 residential and business addresses, a dedicated consultation website, with an online comments form, contact details and an introductory film show St James' vision and ambition for the new neighbourhood at MKE.
- B6.10 Given the COVID-19 restrictions and the Housing Infrastructure Funding timescale challenges, the applicants MKE consultation is being run via its website (<https://miltonkeyneseast.co.uk/>). It was launched on 22<sup>nd</sup> February 2021 and will remain open for comment until September 2021. Local residents and stakeholders will still have the opportunity to engage with detailed proposals as they come forward in the future.
- B6.11 During the pre-application engagement, presentations were also given to local councillors, parishes, the local community, local stakeholder groups and forums and the MK Development Review Forum.

## **B7.0 Abbreviations & Definitions**

- 1 EIA - Environmental Impact Assessment
- 2 ES - Environmental Statement
- 3 MKE - Milton Keynes East
- 4 MKC - Milton Keynes Council
- 5 PROW – Public Right of Way
- 6 LLFA – Local Lead Flood Authority
- 7 LVIA – Landscape and Visual Impact Assessment
- 8 TA – Transport Assessment
- 9 IEMA - Institute of Environmental Management and Assessment

## **B8.o**      **References**

- 1    Town and Country Planning (EIA) Regulations 2017
- 2    Town and Country Planning and Infrastructure Planning (Environmental Impact Assessment) (Amendment) Regulations 2018
- 3    Town and Country Planning (Development Management Procedure, Listed Buildings and Environmental Impact Assessment) (England) (Coronavirus) (Amendment) Regulations 2020
- 4    EU Directive No 2014/52/EU on the assessment of certain public and private projects on the environment
- 5    Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018
- 6    Environmental Impact Assessment Guide to: Shaping Quality Development (IEMA, November 2015)
- 7    Environmental Impact Assessment Guide to: Delivering Quality Development (IEMA, July 2016)
- 8    Delivering Proportionate EIA: A Collaborative Strategy for Enhancing UK Environmental Impact Assessment Practice (IEMA, July 2017)