



Milton Keynes
City Council

MK City Plan 2050: Sustainability Appraisal.

Regulation 18 consultation version

Development Plans,
Planning and Placemaking

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Introduction

What is a Sustainability Appraisal and when is one required?

- 1.1** Under Section 19 (5) of the Planning and Compulsory Purchase Act 2004, local planning authorities are required to carry out a Sustainability Appraisal (SA) of the proposals in planning documents. SA is a systematic process that must be carried out during the preparation of local plans and spatial development strategies. Its role is to promote sustainable development by assessing the extent to which the emerging MK City Plan 2050 will help to achieve relevant environmental, economic, and social objectives, when judged against reasonable alternatives.
- 1.2** It is also a requirement that the SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations (EAPPR) 2004 ('the Regulations'). The EAPPR requires plans or programmes which are likely to have significant (positive or negative) environmental effects to undergo a Strategic Environmental Assessment (SEA). While a SA and SEA are required by separate legislation, the two processes are procedurally the same and there is no legislation or guidance to suggest that SA should differ from the SEA process, meaning it is appropriate to undertake SA and SEA together. The SA for the MK City Plan 2050 also incorporates the requirements of the EAPPR.
- 1.3** The process is an opportunity to consider ways by which the plan can contribute to improvements in environmental, social, and economic conditions, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have. By doing so, it can help make sure that the spatial strategy proposals in the plan are appropriate given the 'reasonable alternatives'. It can be used to test the evidence underpinning the plan and help to demonstrate how the tests of soundness have been met. SA should be applied as an iterative process informing the development of the plan¹.
- 1.4** This SA report seeks to answer the following questions:
1. What has plan-making and SA involved up to this point? (including in relation to "reasonable alternatives")
 2. What are the SA findings at this stage, in relation to the draft plan?
 3. What happens next?
- 1.5** We have published this version of the SA report for consultation alongside the draft MK City Plan 2050, under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012². This report will then be considered, alongside consultation responses, when we finalise the plan.

¹ <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal#strategic-environmental-assessment-and-sustainability-appraisal>

² <https://www.legislation.gov.uk/uksi/2012/767/regulation/18>

Sustainable Development

- 1.6** Following the publication of the Our Common Future Report by the World Commission on Environment and Development in 1987³, sustainable development is understood to be:

“Development which meets the needs of the present without compromising the ability of future generations to meet their own needs.”

- 1.7** Paragraph 7 of the National Planning Policy Framework (2023)⁴ states that the purpose of the planning system is to contribute to the achievement of sustainable development.

- 1.8** Paragraph 8 of the NPPF specifies that achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

- A) An **economic** objective – to help build a strong, responsive, and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation, and improved productivity; and by identifying and coordinating the provision of infrastructure; and
- B) A **social** objective – to support strong, vibrant, and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful, and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and
- C) An **environmental** objective – to protect and enhance our natural, built, and historic environment, including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

³ <https://sustainabledevelopment.un.org/content/documents/5987our-common-future.pdf>

⁴ https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf

Sustainability Appraisal Methodology

1.9 There are five formal stages of the Sustainability Appraisal process. These are set out in the Planning Practice Guidance and are shown in the flowchart in Figure 1.1 below.

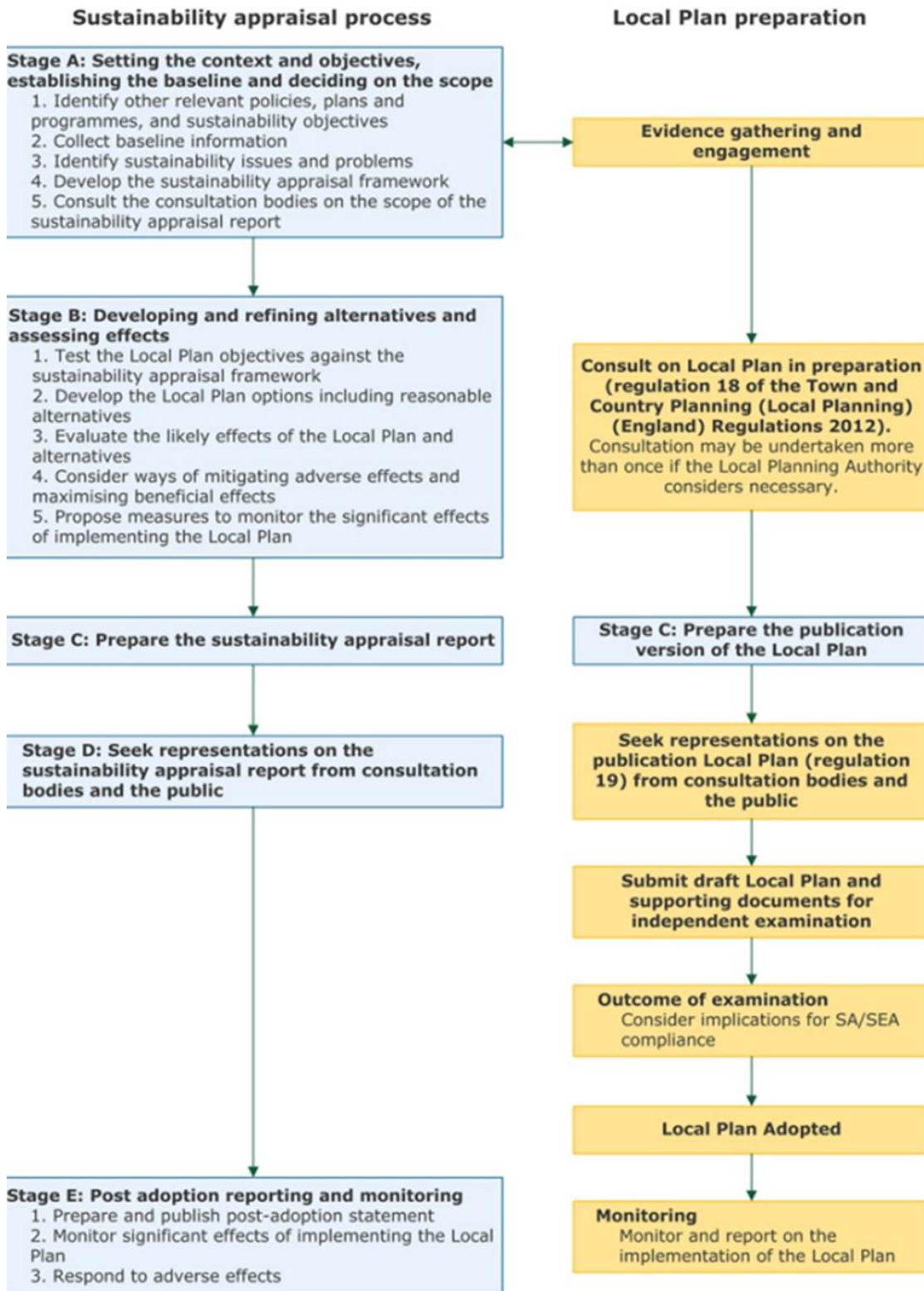


Figure 1.1: Flowchart of Sustainability Appraisal Process. Source: Planning Practice Guidance⁵.

⁵ <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

1.10 We previously published our SA Scoping Report (2022)⁶ which focused on the steps outlined in Stage A of the Sustainability Appraisal process in the flowchart. This report focuses on Stages B and C of the SA process and runs alongside the Regulation 18 consultation on the draft MK City Plan 2050.

MK City Plan 2050 Objectives

1.11 The objectives of the MK City Plan 2050 are split into 4 key themes which drive the plan, these are:

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.

⁶ <https://www.milton-keynes.gov.uk/sites/default/files/2023-01/MKNCP%20SA%20Scoping%20Report.pdf>

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.

1.12 These plan objectives correspond to the objectives within the assessment criteria and framework of the SA. The SA framework objectives are shown in Table 1.1.

1.13 There is also a strong focus on Central Milton Keynes (CMK) within the MK City Plan 2050 with specific place-based objectives around this.

Scope of the Sustainability Appraisal

1.14 This section introduces the scope of the SA, including the sustainability issues and objectives that provide the framework for the SA assessment. Further information on the sustainability context and baseline data used in the SA is presented in **Appendix 1**. The appendices will be published as supporting documents alongside this report.

1.15 We consulted with statutory consultation bodies and members of the public on the proposed SA scope from 31st January 2023 to 16th March 2023. The SA objectives have evolved following the consultation work and the emergence of new evidence. However, the scope remains fundamentally the same as that put forward during the scoping consultation. Table 1.1 presents the 9 sustainability objectives established through scoping work and refined through consultation and evidence work.

Table 1.1: SA Objectives and Assessment Indicators			
No.	MK City Plan 2050 Theme	Objective	Assessment Indicators
1	High Quality Homes and Neighbourhoods; Healthy Places; Climate and Environmental Action	Support establishment of walkable neighbourhoods in existing and new areas by 2050, by improving access to health, community and leisure facilities for all people in MK.	<ul style="list-style-type: none"> - Proximity of proposed housing and employment sites to existing local centres, and community facilities. - Capacity of existing facilities to accommodate new demand.
2	Healthy Places; High Quality Homes and Neighbourhoods	Support improvements to physical and mental health through well designed places and by improving availability of and access to health facilities and good quality green and blue infrastructure for all people in MK by 2050.	<ul style="list-style-type: none"> - Proximity of proposed housing and employment sites to existing open green spaces. - Proximity of sites to existing health facilities. - Potential of site to accommodate new health facilities. - Potential of site to provide new green and blue infrastructure. - Capacity of existing facilities to accommodate new demand.
3	Climate and Environmental Action	Provide and improve accessibility for communities in line with our modal shift targets, promote active travel, and minimise car dependent communities.	<ul style="list-style-type: none"> - Proximity of sites to existing public transport routes, Redways, and proposed MRT routes - Proximity of sites to existing facilities and services and public transport links (with emphasis on rail stations and active travel links).
4	High Quality Homes and Neighbourhoods; Healthy Places	Over the plan period provide a supply and mix of market and affordable good quality housing, that meets our calculated needs and aspirations.	<ul style="list-style-type: none"> - Whether a site would provide affordable housing (based on the minimum threshold). - Whether a site would be able to meet our housing mix needs across the plan period.

			- Timescales of when the site would be deliverable/developable.
5	Climate and Environmental Action; Healthy Places	Over the plan period, new development supports reduction of greenhouse gas emissions from the built environment and supports communities that can 'bounce-back' from environmental challenges, helps protect human and environmental health, and supports reductions in fuel poverty.	<ul style="list-style-type: none"> - Is the site in flood risk zone? - Proximity of sites to areas with higher than local average air pollution levels. - Whether a site would use brownfield land or result in remediation of contaminated land.
6	Economic and Cultural Prosperity	Designated and non-designated archaeological, built heritage, natural and biodiversity, and cultural assets are protected and enhanced over the plan period.	<ul style="list-style-type: none"> - Proximity of sites to assets and the likelihood of harm to/sterilisation of the asset. - Proximity of sites to areas with a high Agricultural Land Classification. - Proximity of housing and employment sites to Minerals Safeguarding and Consultation Areas.
7	Climate and Environmental Action	Support creation of a zero-waste economy in MK by 2050.	- Proximity of sites to site waste management facilities.
8	Climate and Environmental Action	Increased water efficiency, including through water reuse and recycling measures, and contributes to improved water quality by 2050.	- Proximity of sites to Source Protection Zones.
9	Economic and Cultural Prosperity	By 2050 Milton Keynes has a prosperous, diverse, inclusive, and resilient economy enabled by a high skilled workforce.	<ul style="list-style-type: none"> - Size of the employment site proposed. - Whether the site would provide opportunities for further/higher education facilities. - Proximity of employment sites to public transport links.

1.16 The objectives and assessment indicators shown above are the framework and criteria against which our strategic growth options have been considered and assessed.

Defining the Reasonable Alternatives

- 2.1** This section sets out the reasonable spatial strategy alternatives for appraisal and consultation and the steps we have taken to arrive at these. The aim of this section is to present “an outline of the reasons for selecting the alternatives dealt with”, in accordance with the Regulations.

Step 1 – Strategic/High Level Factors

- 2.2** This section considers the high-level, ‘top-down’, issues relevant to the development of our spatial strategy alternatives.

- 2.3** The National Planning Policy Framework (NPPF) (2023)⁷ states that:

“To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. The overall aim should be to meet as much of an area’s identified housing need as possible, including with an appropriate mix of housing types for the local community.” (NPPF 2023 Paragraph 60)

- 2.4** Paragraph 61 of the NPPF sets out a requirement for strategic policies to be informed by a local housing need assessment, conducted using the standard method in national planning guidance, to determine the minimum number of homes needed.

- 2.5** Paragraph 22 of the NPPF states that:

“Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.”

- 2.6** Additionally, NPPF paragraph 23 requires that the broad locations allocated for development are indicated on a key diagram, with land-use designations and allocations identified on a policies map.

⁷ https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf

Growth needs and ambitions

2.7 The Milton Keynes Futures 2050 Commission Report (2016)⁸ begins with the following statement of ambition –

“Milton Keynes is the fastest growing city in the UK. This is driven by the people who feel the city is a great place to live and entrepreneurs and companies who decide it is a great place to invest. Milton Keynes is also a truly beautiful city... There is no other city in the world like it.

No city stands still – it either grows or declines. We urge that Milton Keynes commits to continuing to grow its population to 2050 and seizes the opportunity to create an even stronger, high-performing economy, a true regional economic centre. Equally, we urge that future plans respect the city’s distinctive heritage...”

2.8 Since 2016, the MK Futures team have prepared and adopted a ‘Strategy for 2050’⁹. The aim of the Strategy for 2050 is to shape development and growth in MK to support a population of 410,000 people by 2050. The Strategy sets out Seven Big Ambitions for MK city, as set out in Figure 2.1:



Figure 2.1: Seven Big Ambitions for Milton Keynes in 2050. Strategy for 2050.

⁸ <https://www.mkfutures2050.com/>

⁹ <https://www.milton-keynes.gov.uk/sites/default/files/2022-03/STRATEGY%20FOR%202050%20NEW%20DESIGN%20-%20FOR%20EMAIL.pdf>

2.9 The Housing and Economic Development Needs Assessment (HEDNA) identifies the minimum annual local housing need figure for Milton Keynes as 1,902 homes per year, or 53,256 homes for the MK City Plan 2050 period (2022-2050). This has been produced using the standard method calculation set out in national planning practice guidance. Within the 53,256 homes, the HEDNA identifies an overall affordable housing need of 14,331 homes over the 28-year period 2022-50, equivalent to an average of 512 per annum. The HEDNA also considers the higher aspirational growth target set out in the Strategy for 2050, based on reaching a population of 410,000 by 2050. This would require housing delivery to average 2,265 dwellings per year, around 63,000 homes in total. Further detail on our housing needs is summarised in the High Quality Homes Topic Paper. This means that the MK City Plan 2050 will need to allocate a minimum of 24,000 homes¹⁰, but in reality a higher figure may be required to ensure adequate supply and to match the Strategy for 2050 aspirations.

2.10 We have chosen to plan for a range of **53,000-63,000 homes** over the MK City Plan 2050 period. This figure includes the homes coming forward during the plan period through previous plan allocations and planning permissions. Given the minimum housing need figure identified in the HEDNA, we must plan for a minimum of 53,000 homes across the plan period. As set out in NPPF (2023) paragraph 11(b), *“strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses”*. Therefore, we shouldn’t plan for less than our identified housing need unless there are specific reasons consistent for paragraph 11 of the NPPF (2023) for doing so. MK has very limited constraints related to paragraph 11 of the NPPF (2023) that justify planning to provide less than our objectively assessed need, and enough site options have been put forward to enable this level of housing delivery to occur. To make sure our housing needs are met, we aim to go over and above our objectively assessed level of need and plan for a ‘buffer’ of additional housing. As above, the Strategy for 2050 sets out our aspirational growth target of 63,000 homes, and this forms the top end of our planned range of housing delivery. While there is no upper limit on planning for growth, there is no obvious justification or opportunity for the MK City Plan 2050 to plan for greater than 63,000 homes. Without an extraordinary intervention into the delivery of development, further planned growth beyond this figure would face doubts over whether it could be achieved within the plan period.

2.11 The range of 53,000-63,000 homes is considered reasonable to plan for given our strategic context. It therefore forms the basis of our preferred growth strategy and reasonable alternatives, as set out in Chapters 3 and 4 of this report.

2.12 Additionally, MK has several growth opportunities which may help to shape the direction of growth and will be considered during the preparation of the plan. These are discussed further below:

¹⁰ Taking into account 29,075 homes that are already due to come forward in the plan period through previous plans and planning permissions.

Mass Rapid Transit (MRT)

- 2.13** Milton Keynes was originally planned to be a low-density, dispersed poly-centric town when it was first designated as a New Town in 1967. The existing pattern of development has led to a high dependency on cars as the primary method of transport for many people in MK. As the city has grown in size and population, this car dependency has resulted in higher congestion on our grid-road system and has impacts on climate change and the health of local people.
- 2.14** The Strategy for 2050 seeks to respond to these issues by promoting active travel methods (walking, cycling, and wheeling) for shorter trips and a Mass Rapid Transit (MRT) system for longer trips, to provide alternative transport options for residents and enable sustainable growth.
- 2.15** The proposals for MRT suggest the need for a shift in the approach to development within the urban area of Milton Keynes to achieve sustainable growth. It is likely that higher densities will be required in certain locations to ensure that MRT can function effectively as an attractive alternative mode of transport to the car. According to the MRT Strategic Outline Business Case, existing settlements in MK typically have lower densities than the 60 dwellings per hectare (DPH) required for MRT to run effectively¹¹. The MRT Strategic Outline Business Case points to international examples of MRT, such as Freiburg, Germany which has an average density of 90-100 DPH.

East-West Rail (EWR)

- 2.16** East-West Rail (EWR) is a nationally significant railway project, aiming to deliver transport connections for communities between Oxford and Cambridge, including Milton Keynes. It aims to remove constraints to growth in this area and boost education, business, technology, and leisure opportunities across this region. Figure 2.2 shows the planned EWR route.

¹¹ MK MRT Strategic Outline Business Case (2022)

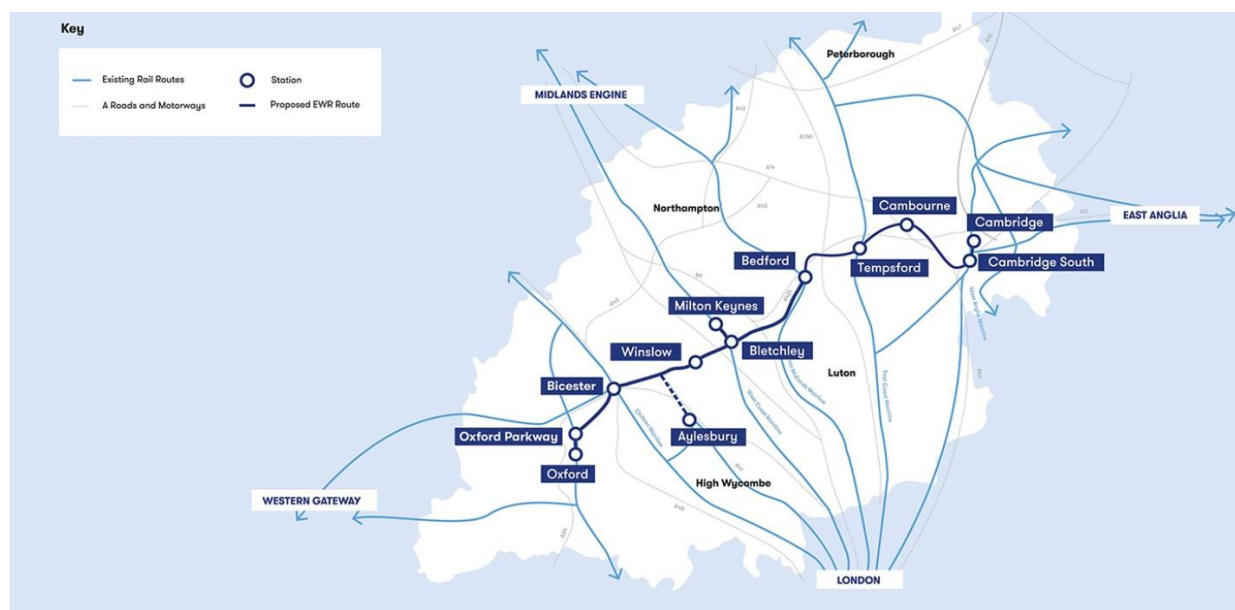


Figure 2.2: EWR route showing existing transport connections.¹²

2.17 A major upgrade of the existing railway line from Oxford to Bicester was completed in December 2016. A further section of railway between Bicester and Bletchley is currently under construction and intended to become operational from 2025¹³. Future stages of the EWR project, including routes from Oxford to Bedford and Oxford to Cambridge are still at planning stage at the time of writing, and are highly dependent on funding and planning approvals.

Delivery Mechanisms

2.18 In accordance with the Strategy for 2050, we have been reviewing the range of options available to help deliver our long-term growth programme, to meet the scale, pace, and quality of development to which the city aspires.

2.19 In Chapter Ten of the Strategy for 2050, ‘Making it Happen’, we recognised that to maintain the scale, pace, and quality of development to meet those ambitions, an alternative delivery approach may be needed. A ‘business as usual’ approach may not guarantee that development would achieve the standards that Milton Keynes strives for.

2.20 To allow us to understand the range of options we have, and which would be the best fit for our growth agenda, we secured DLUHC funding under their “New Development Corporations Competition” scheme. This has allowed us to appoint expert advisors to work with us in delivering this work. The outputs of this work will form part of the evidence base to support the MK City Plan through its preparation, submission, and examination, to demonstrate how the growth set out in the plan will be delivered.

2.21 The key challenge for our long-term growth programme is infrastructure maintenance and delivery. This includes addressing the increasing maintenance burden of existing

¹² <https://eastwestrail.co.uk/about-us/project-overview>

¹³ <https://eastwestrail.co.uk/about-us/project-overview>

infrastructure which has the potential to cause a barrier to our ability to delivery further growth at the scale and pace that meets our ambitions.

2.22 A series of programme objectives have been developed that reflect this challenge. These have been used as Critical Success Factors to help assess the range of options, summarised as follows:

The project will be successful if we deliver on our local ambition for Milton Keynes as set by the Council Plan, the (emerging) MK City Plan 2050, and the Strategy for 2050, to be a thriving, progressive and sustainable city by:

1. *Strengthening the city's infrastructure*
2. *Identifying future land and development*
3. *Promoting sustainability*
4. *Developing the right governance*
5. *Acting strategically*
6. *Achieving financial sustainability*
7. *Managing risk and reward.*

MK Sustainable Growth Challenges

2.23 While MK has a number of opportunities for sustainable growth, the Strategy for 2050 identifies the key challenges to be overcome in order to achieve sustainable growth of the city and support its growing population. These are grouped into the following categories:

- Our health and wellbeing
- Our affordability
- Our skills
- Our carbon agenda
- Our CMK challenges

2.24 In terms of the Sustainability Appraisal of the MK City Plan 2050, Article 1(d) of Schedule 1 of the EAPPR 2004 states that “environmental problems relevant to the plan or programme” should be considered when determining the likely significance of effects on the environment.

2.25 Article 2 of Schedule 2 of the EAPPR 2004 states that Environmental Reports will list the “relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme”.

2.26 In line with the above Articles, this chapter lists the sustainability issues relevant to the MKCC area, as indicated by the baseline data collated as part of the SA scoping stage, the emerging evidence base studies (see Figure 2.3) which have been prepared to support the MK City Plan 2050, and the knowledge of officers within the Planning Service and the wider Council. The baseline data is available at **Appendix 1**.



Figure 2.3: Evidence base studies prepared in support of the MK City Plan 2050.

2.27 Our SA scoping report identified the following categories of sustainability issue which the MK City Plan 2050 seeks to address, and which have informed the objectives of the SA Framework:

- Population
- Crime
- Health
- Housing and Regeneration
- Economy and Skills
- Transport
- Historic Environment and Heritage
- Water, Pollution and Climate Change
- Natural Environment and Biodiversity
- Minerals
- Waste

2.28 The categories above represent our high-level, ‘top-down’ strategic considerations. They are explored in more detail below. Baseline data for these considerations can be found in **Appendix 1**.

Population

2.29 Recent Census 2021 data indicates that Milton Keynes’ population is increasing quickly. It is yet to be seen what the impact of recent economic downturn and uncertainty will be on population growth. Recent trends shown in our Housing and Economic Development Needs Assessment (HEDNA) indicate that further growth is likely to occur, not least as development committed to in Plan:MK continues to be delivered through to 2031 and beyond. Further additional population growth poses challenges associated with providing sufficient health, social, education and other types of infrastructure and services, including housing to support the growing population. It may also be challenging to provide sufficient specialist housing and facilities to support an ageing population, which Census data suggests is the case in Milton Keynes.

- 2.30** Further population growth also makes it harder to protect the environmental characteristics of the area from further potential expansion of the city and surrounding settlements if it is not done in a planned way. Consideration of potential increased pressure on transport and waste systems will also be required. Not delivering the Plan may increase the likelihood that adverse environmental impacts arise because of resulting speculative unplanned development.
- 2.31** Data also indicates the population is becoming more ethnically diverse. Changes to the make-up of the population may create new needs for different types of accommodation, facilities, services, and infrastructure within the MKCC area. Not delivering the MK City Plan 2050 may mean that the planning policy does not adequately meet the needs of different groups in the city.
- 2.32** Data from the 2021 Census is available to show the proportion of people within Milton Keynes who are considered to be disabled under the Equality Act 2010. It is reasonable to predict that as the overall population increases then the number of people with disabilities may also increase. A challenge therefore will be to design and provide suitable types of accommodation, facilities, services, and infrastructure to support people with disabilities. Not delivering the MK City Plan 2050 may lead to development that does not adequately meet the needs of people with long-term health conditions and/or disabilities.

Crime

- 2.33** While the rates of some types of crimes have decreased over the past few years, incidents of theft from a person, public order offences, violent, hate and abuse crime have increased. The Plan seeks to ensure new development can encourage inclusive and safe design, as well as good levels of activity at most times of the day, thus providing a high degree of natural surveillance and continuing to discourage criminal activity.

Health and wellbeing

- 2.34** While many residents of MK enjoy a good quality of life, we face challenges which affect the health and wellbeing of some residents and risk them being “left behind” as our city grows.
- 2.35** Recent data indicates that life expectancy in Milton Keynes is slightly decreasing. It is less than in Buckinghamshire but is broadly comparable to Bedford Borough. Under 75 mortality rates from all causes, including cardiovascular disease and cancers tends to be slightly better than average when compared nationally. Recent trends for under 75 mortalities in Milton Keynes have also been stable.
- 2.36** Considering declining life expectancy and to further reduce under 75 mortalities, the MK City Plan 2050 seeks to promote healthier, more active lifestyles and improve the health of the population through careful planning and layout of new development, the location of services and facilities and the provision of transport routes that encourage and facilitate walking and cycling.

- 2.37** Increasing childhood inactivity levels highlight the need for greater emphasis on the range of physical activities and opportunities to offer for young people, as well as discouraging access to sources of unhealthy foods.
- 2.38** The prevalence of mental health conditions in Milton Keynes supports provision of a range of opportunities for people to socialise and interact with each other within the built environment, as well as good access to green spaces and recreational opportunities which can support good mental health.
- 2.39** Not delivering a plan which maximises the opportunities for new development to improve local health outcomes may result in lower quality of life for residents. It may also lead to increased financial burdens on local health services. Good planning and urban design play a large role in reducing the chances of people developing certain health conditions in later life. For example, good access to green spaces, space for food growing, and recreational opportunities can encourage increased activity levels, reducing obesity rates and improving cardiovascular health.
- 2.40** For the reasons above, SA objective 2 is designed to assess sites against their ability to promote improvements to physical and mental health for all people in MK.

Housing and Regeneration

- 2.41** Due to Milton Keynes unique design and history, the city does not have a lot of brownfield or previously developed land available for redevelopment. We have also used and developed most brownfield land that is available in the MKCC area in recent years, with the stock of land on the Brownfield Register decreasing accordingly. Whilst, two larger scale brownfield opportunities have become apparent so far in preparing the MK City Plan 2050, we have had to consider and appraise further greenfield development sites in order to provide future housing and employment development to meet our current and projected needs. Greenfield development brings with it the risk of environmental harms and potentially less sustainable transport patterns unless it is planned appropriately. However, the SA framework seeks to identify the areas within the city not on the brownfield register that can support sustainable patterns of development.
- 2.42** Under-provision of self-build and custom house-building plots makes it more difficult for people to find land on which they can build houses to meet their specific needs. The new Plan seeks to address how sufficient supply shall be provided.
- 2.43** IMD data indicates the more deprived areas are near/in the older towns of Bletchley and Wolverton which pre-date the New Town designation and development of Milton Keynes, as well as the older estates within the New Town itself. The MK City Plan 2050 seeks to identify how development can help to lower deprivation across the MKCC area.
- 2.44** A higher-than-average median house price to median earnings ratio may make it more difficult for people in Milton Keynes to enter the housing market, pay off mortgages in a reasonable timeframe, pay reasonable rent levels, and have a greater proportion of their earnings to spend on other goods and services or put into savings.

2.45 Recent increased affordable housing provision is positive. However, changing economic conditions may make affordable access to housing more difficult leading to the number of people in Milton Keynes that are homeless, living in overcrowded accommodation, or seeking temporary accommodation. The MK City Plan 2050 seeks to ensure that sufficient amounts and types of affordable housing is provided to meet local needs.

2.46 Not adopting a sound Local Plan may lead to increased overcrowding, homelessness, and households living in temporary accommodation. It may also lead to increased speculative development in locations that are not preferred or appropriate. These may give rise to associated environmental harms, people having to move away from Milton Keynes due to unaffordable rents/house prices (and linked labour supply issues), and potential failure to ensure a sufficient supply of land for self-build houses.

Economy and Skills

2.47 As with housing development, a shortage of available brownfield land may make it more challenging to provide land to meet our employment floorspace needs without relying on greenfield sites, depending on what floorspace is needed in the future to support a growing economy.

2.48 Most workers in Milton Keynes earn a wage that is below the average wage level in the MKCC area. This highlights a need to support education and skills development and the creation of more skilled jobs that are accessible to the resident population of Milton Keynes.

2.49 Business survival rates are decreasing, and universal credit claimant rates are higher than the Southeast and national averages. The MK City Plan 2050 seeks to support education and skills training, existing and new businesses, and job creation.

2.50 Not adopting a Local Plan could make it more difficult for businesses to survive in Milton Keynes, due to uncertainty about the availability of employment land and MKCC's likely response to proposals to improve existing employment sites. This would likely have adverse effects on job creation, inward investment, and may lead to more residents relying on state benefits to meet their needs.

2.51 Recent data suggests a lower percentage of the MK population holds an NVQ4+ level qualification compared with the UK average. GCSE attainments are also below the national average. Continuation of these trends may mean that MK residents are at a competitive disadvantage when entering the wider workforce, and a lack of well-educated and skilled resident workers would present challenges to employers seeking to recruit and build their businesses. The MK City Plan 2050 therefore aims to facilitate the provision of a suitable range of educational establishments to meet local learning needs, for adults as well as children.

2.52 Not adopting a Local Plan would likely increase the uncertainty associated with delivering new schools and other educational developments. This would likely lead to increased demand on existing schools, facilities, and services. A potential consequence may be

overcrowded schools, and worse educational attainment rates. This would have knock on impacts for local productivity and economic prosperity.

Transport

2.53 Failing to increase active travel and use of public transport may limit efforts to decarbonise the movement of people in MK and reduce the accessibility of certain locations within the borough, which until now have not been as well served by public transportation as other areas. Future development that does not support active travel and the viability of public transport (or other modal shift interventions which reduce private car dependence) increases the likelihood of not meeting our net zero and carbon negative targets. It also hinders the inclusivity of our transport network. It will also fail to support, and potentially limit, efforts to improve levels of physical activity (and therefore health outcomes overall) and access to economic opportunities for those unable to access a private car.

Historic Environment and Heritage

2.54 There is a wealth of heritage assets in Milton Keynes. Careful siting, design and management will be required to ensure that new development does not harm these assets. The character and setting of assets should therefore be considered when choosing and developing appropriate development sites. Opportunities to preserve assets in private ownerships, such as Scheduled Monuments, should be taken advantage of where possible. Loss of and harm to valuable local assets may occur if an appropriate Plan is not put in place to ensure they are considered appropriately in planning decisions. The objectives of the MK City Plan 2050 and its Sustainability Appraisal seek to protect and enhance designated and non-designated archaeological, built heritage and cultural assets over the plan period.

Water, Pollution and Climate Change

2.55 The built environment and transport sectors continue to be a large source of greenhouse gas emissions. It is a driver of climate change which will result in more frequent damaging weather patterns and flood events in the future. There are opportunities to lower carbon footprints by providing more energy efficient housing, more renewable energy sources, locating new development close to existing facilities and services, and improving public transport networks. Such development can also reduce fuel poverty, improve indoor air quality, and reduce overheating risk. There are also many opportunities to provide new development which improves local air quality and makes development more adaptable to a changing climate (such as green walls and roofs and not developing in flood zones). Not delivering a Local Plan which maximises opportunities to mitigate and adapt to climate change will increase the vulnerability of residents and businesses in Milton Keynes to its effects.

2.56 Predicted water supply deficits pose a threat to residents and businesses in Milton Keynes. From reduced drinking water supplies to reduced goods production and economic output, the effects of water shortages can be wide ranging. This is an issue largely outside of the control of MKCC. Water companies such as Anglian Water have important roles to play and are aware of these matters. However, not delivering a plan which ensures new

development helps mitigate these issues may reduce the effectiveness of measures taken elsewhere.

2.57 Continued poor water quality in our streams, rivers and lakes may result in adverse impact of environmental and human health, and potential contamination of drinking water supplies. Water quality is not a matter entirely within the control of the planning system. Environmental Permits issued by the EA – regulating the extent of activities undertaken on land and in water bodies across England – play a large role. However, planning does have a role to play in supporting improvements to water quality. Not delivering a Plan which covers these issues may result in a worsening of water quality in water sources in the MKCC and surrounding areas.

2.58 New construction activity, and the developments they produce, increase the amount of potential amenity impacts in an area. The potential for noise pollution increases as a result and may lead to negative impacts on quality of life for local people. Implementation of policies which reduce the chances of noise pollution is therefore an important part of any plan.

2.59 Air quality in Milton Keynes is generally good although air pollution does occur, particularly along major roads. Increases in the future population may lead to increased use of private vehicles with internal combustion engines, increased congestion, and potential increased air pollution. The MK City Plan 2050 shall consider measures to avoid or mitigate this, for instance through support of more sustainable transport modes (including provision of EV infrastructure) and shifts away from use of gas-fired central heating systems.

Natural Environment and Biodiversity

2.60 There is a wide variety of natural habitats and biodiversity in Milton Keynes. However, new development can pose significant risks to biodiversity and by extension, our ability to combat climate change. Therefore, the MK City Plan 2050 seeks to ensure that risks to biodiversity are either avoided entirely, through careful site selection, mitigated, or in the last instance compensated for. Not delivering a Plan may lead to development in inappropriate locations which leads to reductions in the amount of biodiversity and wildlife sites in the MKCC area.

Minerals

2.61 There is not a significant amount of minerals related development within the MKCC area currently. However, there is a large area where workable mineral deposits may be found. A risk may be that additional housing, employment, and other types of development prevent the future mining and winning of minerals. This may occur because of new development being located above mineral deposits. It may also occur due to new development (especially housing) being located near mineral deposits, resulting in future minerals developments nearby being unacceptable due to the potential adverse impacts of such development, such as noise and air pollution.

2.62 Safeguarding areas for potential minerals development will help conserve the future local supply of minerals and reduce reliance on the need for local businesses to import minerals

from outside the MKCC area. However, the safeguarding of the rail depot at Bletchley, and other minerals transport infrastructure, are acknowledged for their importance in ensuring an adequate and steady supply of aggregates to Milton Keynes.

Waste

2.63 Overall trends in waste management in Milton Keynes, and in the wider South East region, are positive. Only a very small amount of total waste arising in the MKCC area currently goes to landfill. Reuse, recycling, and energy from waste rates all tend to be better than in neighbouring authorities. However, a potential risk is that a growing population (within and beyond Milton Keynes) increases pressure on, and exceeds, the capacity of local waste facilities to sustainably process waste. As such, looking at the proximity of new development areas to existing waste management sites has been a consideration within the SA (see SA Objective 7), as this helps to reduce green house gas emissions associated with the transport of waste. Moreover, the safeguarding of waste management facilities, and sites where additional facilities may be located helps to ensure we can sustainably manage waste within Milton Keynes.

Step 2 – Supply Options

Housing Sites

2.64 As part of the top-down approach to identifying Reasonable Alternatives, we initially considered the Recommended Growth Options (RGO) in the Strategy for 2050, as shown in Figure 2.4.

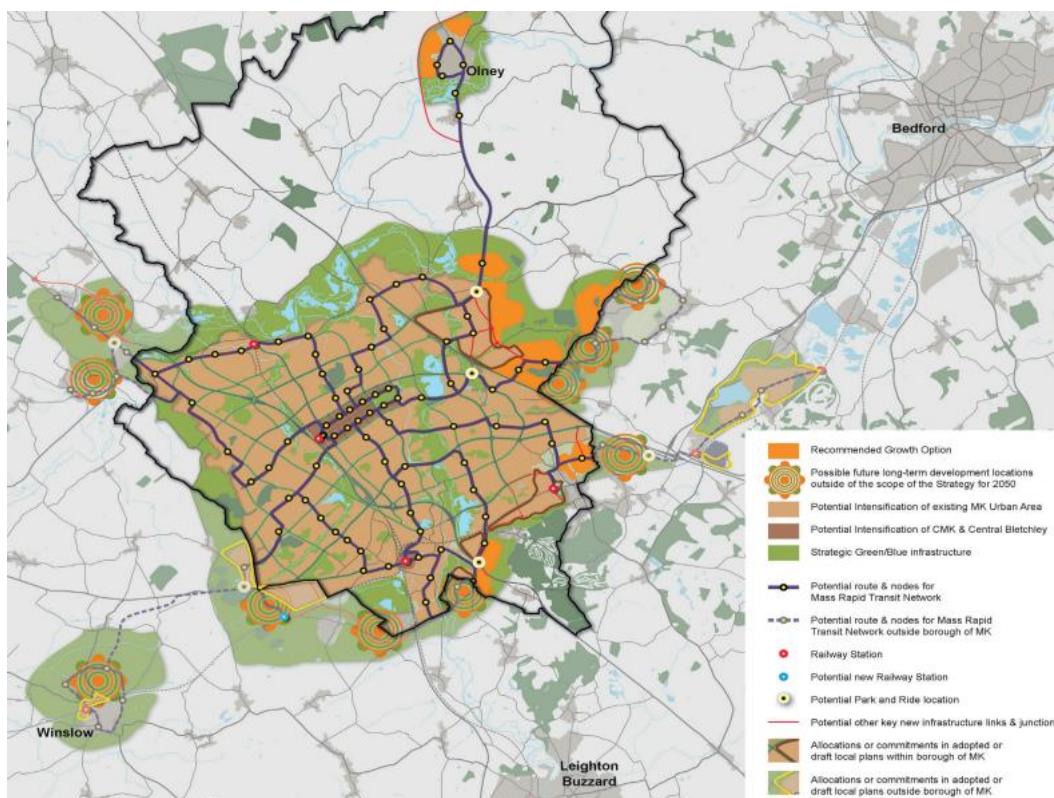


Figure 2.4: Recommended Spatial Strategy, Strategy for 2050.

2.65 The RGOs in the Strategy for 2050 were based on several assumptions, such as certain infrastructure coming forward and the suitability of land for development. The situation has since changed, for example the proposed MRT routes have changed following evidence work emerging and detailed site assessments have occurred through land availability assessment work. Therefore, the overall spatial strategy or options within the suggested RGO may no longer work as reasonable alternative growth strategies in the MK City Plan 2050.

2.66 Adopting a ‘bottom-up’ approach alongside the ‘top down’ approach helps us to refine potential options and alternatives further. This involves consideration of the site or growth location options that have been identified through the Call for Sites consultation and other site identification work we may undertake in preparing the plan.

2.67 Using the findings of the Council’s Strategic Housing Land Availability Assessment (SHLAA) as a starting point, we determined which sites put forward during the Call for Sites were suitable to progress to be tested against the SA framework. This process also allows scope to consider sites which may not have been suitable individually in the SHLAA but may be

suitable as part of 'packages' of Reasonable Alternative growth options, where there is a strategic opportunity for the site to deliver benefits in combination with other suitable sites.

2.68 The site options considered within this report were identified during our Call for Sites consultation, which opened on 13 February 2023 and will remain open until after the end of the Regulation 18 consultation. The sites submitted to us as part of this consultation were assessed within the SHLAA prior to being considered against the SA framework. The SHLAA replaces the previous Strategic Housing Land Availability Assessment (2017).

2.69 The SHLAA determines whether sites are suitable, available, and achievable. The sites which pass these tests are classified as either 'deliverable', meaning that they can come forward for development within 5 years, or 'developable', meaning that they can come forward within the 6 to 15 years of the plan period. This has resulted in 166 potentially suitable sites, from which we have identified a 'long list' of potential site options to be tested against the SA framework objectives. The 'long list' also contains some sites which were assessed as unsuitable or unachievable in the SHLAA. However, we have decided to include some of these in this SA report, effectively to allow us to further consider some options that could reasonably be considered as alternatives and may be able to be part of the growth strategy in the MK City Plan 2050. It has also allowed us to set out the reasons why some sites have not been taken forward for further assessment as Reasonable Alternatives.

2.70 The full 'long list' of site options we have considered in the SA is set out in Table 2.1. The sites have been grouped into the typologies of sites/growth locations shown in each column heading. The numbers of homes shown are the estimated maximum capacity of each site option based on the findings of the SHLAA, but this may differ from the number of homes that would be deliverable over the MK City Plan 2050 period in some cases. The numbers next to some site options correspond to the map in Figure 2.5.

Table 2.1: 'Long list' of SA site options					
MK Urban Area	MK Strategic City Extensions	Key Settlement Expansion	Freestanding Settlements ¹⁴	Rural area	Other (not falling into any of the other categories)
CMK (1) 15,000 homes (11,000 in the plan period)	Eastern expansion (4) 16,000 homes (7,500 in the plan period)	West of Olney (9) 1,000 homes	MK North New Freestanding Settlement (10) 7,300 homes	Expansion of villages 2,300 homes	North of Newport Pagnell (12)¹⁵ 1,000 homes
Bletchley (2) 1,000 – 1,300 homes	South of Bow Brickhill (5) 1,500 homes		Hardmead New Freestanding Settlement (11) 5,500 homes		Regeneration estates*
Strategic Brownfield redevelopment (3) 2,000 homes	Western Expansion Area (WEA) extension 385 homes				
Transport hubs 10,000 homes*	East of Wavendon (post 2038 option) (6) 3,000 homes				
Small brownfield sites (windfall) 3,000 homes	Levante Gate (7) 1,250 homes				
	Shenley Dens (8) 1,000 homes				

** It is either not possible to estimate the likely number of homes for these options at this stage, or further work is required to refine estimates of their development potential. Where possible, further work will be done to refine these options at later stages of preparing the MK City Plan 2050.*

2.71 As part of the preparation of the above 'long list' of sites, we also carried out initial consideration of some non-strategic scale sites which were submitted to the Council during the Call for Sites. However, these sites have not been taken forward at this time because the SA considers strategic scale growth options for allocation within the MK City Plan 2050. The smaller-scale sites put forward would not have been deemed appropriate against the SA framework for reasons including a lack of capacity to support essential infrastructure such as new transport links and community, health, and education facilities.

¹⁴ The Freestanding Settlement options have been deemed undeliverable in the SHLAA. We have included them within the Regulation 18 SA process at this point to further explore their merits (see Table 2.3) were evidence submitted which changes our assessment. As noted in para 2.82, however, these options have been discounted as Reasonable Alternatives due to the SHLAA conclusions.

2.72 The map in Figure 2.5 shows the 'long list' growth options falling under the Urban Area, Strategic City Extensions, Key Settlement Expansion and Freestanding Settlements types. Estate infill, Expansion of villages and Regeneration estates have not been possible to map at this stage as they could apply to various locations throughout MK.

2.73 Transport hub developments are planned to be focused along MRT routes. Exact locations are subject to further evidence work being carried out following the Regulation 18 consultation. A map of the current proposed MRT routes is shown in Figure 2.6.

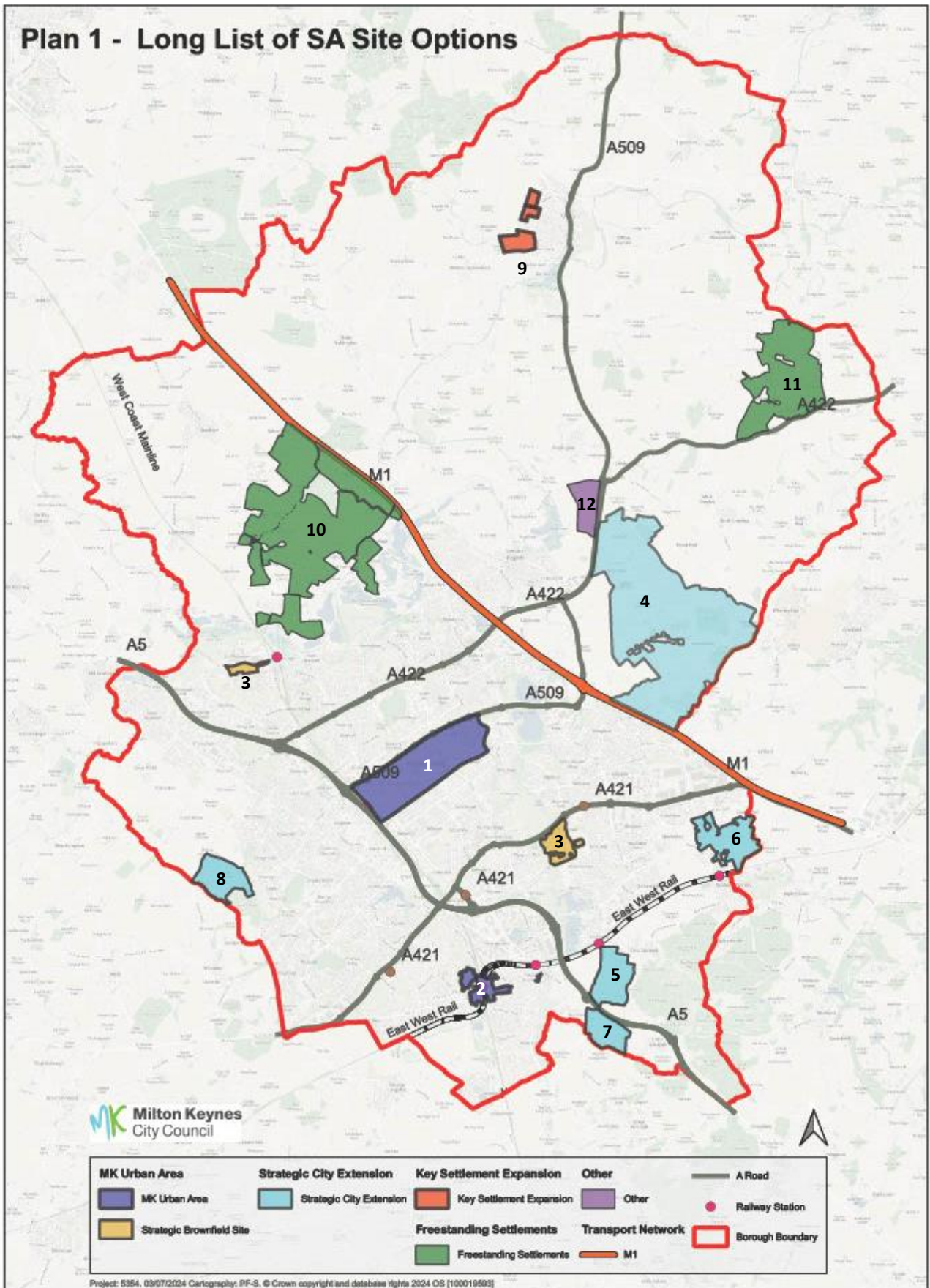


Figure 2.5: Map of 'Long list' of SA site options

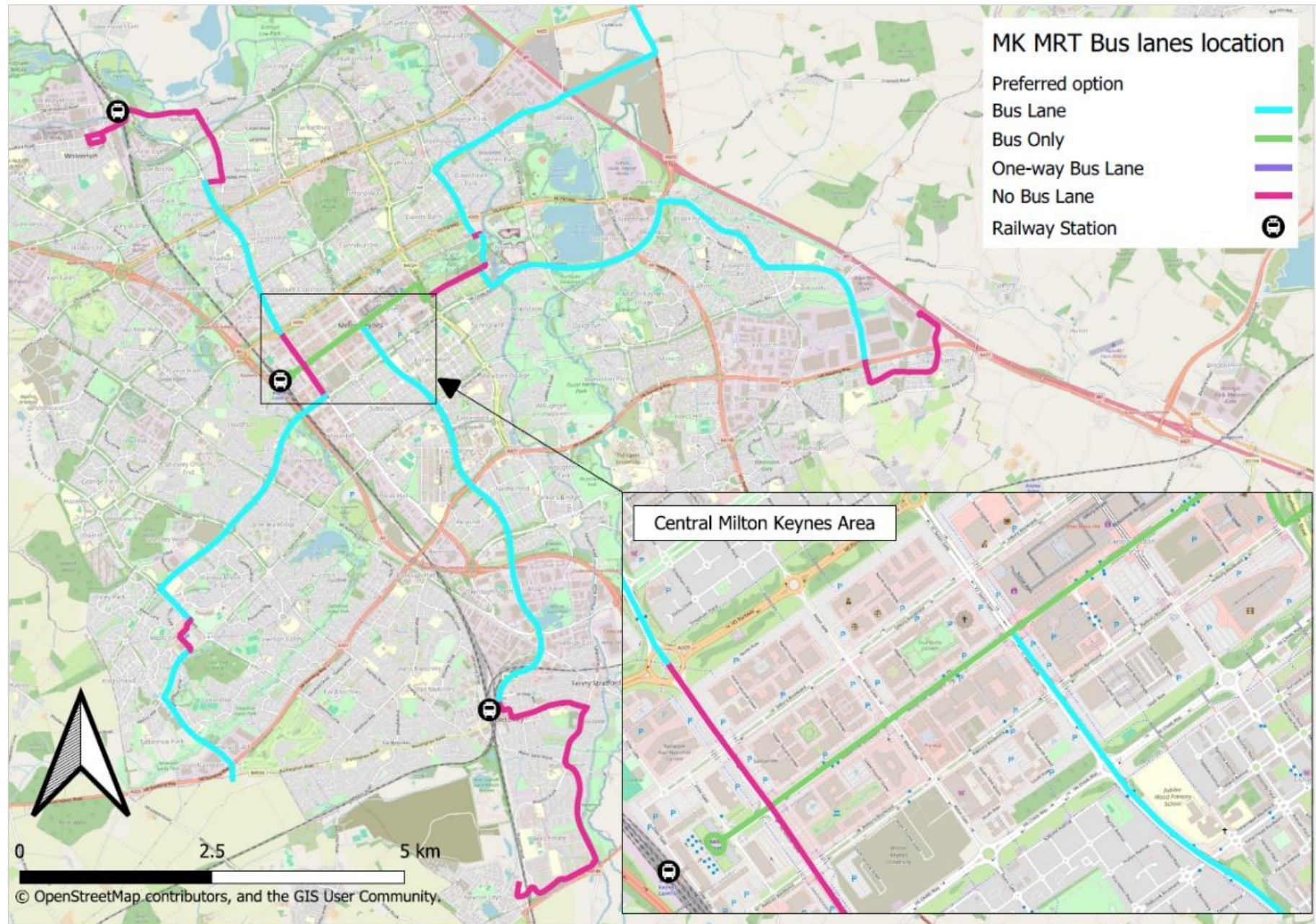


Figure 2.6: Map of current proposed MRT routes

2.74 The 'long list' site options have been scored against each SA objective using a colour-coded assessment guide (Table 2.2), as originally set out in the SA scoping report.

++	Significant positive effect likely
++/-	Mixed significant positive and minor negative effects likely
+	Minor positive effect likely
+/-	Mixed minor effects likely
-	Negative effect likely
--/+	Significant negative and minor positive effects likely
--	Significant negative effects likely
0	Negligible effect likely
?	Likely effect uncertain

2.75 A summary of the assessment scores of each of the individual 'long list' options against the 9 SA framework objectives is shown below in Table 2.3. This is supported by a summary of the key issues and opportunities of each option which have been considered in the assessment. The full draft assessment matrix is available in Appendix 2.

Site Option	SA Objective No.								
	1	2	3	4	5	6	7	8	9
CMK	++/-	--/+	++	+/-	++/-	++/-	+	+	++
<p>Summary: A significant benefit of this location option is the proximity to existing services and facilities within CMK, although the quantity and quality could be improved particularly with regard to community and health facilities. Sites within CMK are close to and within existing employment areas and have the widest variety of public transport links out of all the site options. The proposed MRT routes would all pass-through CMK, and increasing population density in this area would in turn help to support the viability of the MRT network. The location is not subject to significant environmental constraints and the reuse of brownfield land is a positive to the sustainability of the location. The area adjacent to Milton Keynes Central rail station is proposed for mixed-use employment, education, and innovation purposes, which is an opportunity of this site option, as it would provide facilities to improve the skills of the workforce in MK.</p> <p>Drawbacks of this location include limited availability and quality of open space, although it is noted that solutions to this may be possible as shown by the CMK Growth Opportunity Study. It is noted that the proximity of sites to Campbell Park would be a positive aspect, but access to this could be improved for safety and visual appearance. Much of CMK is nominated for inclusion on the Council's New Towns Heritage Register (NTHR), but development applications could be considered on a case-by-case basis to ensure minimal impacts on heritage assets. There are potential issues relating to the viability of developments in CMK and the ability to provide affordable housing and infrastructure contributions. However, sites in CMK could provide</p>									

housing across the plan period and there is the possibility of securing financial contributions to provide social housing elsewhere, which may offset this concern.									
Bletchley	++	--/+	++	+/-	++/-	++/-	+	+	++/-
<p>Summary: Development of sites in Bletchley have the benefit of being linked to EWR projects and existing Bletchley regeneration schemes, which can help to deliver renewal in this area. Like CMK, sites would be located within an existing developed area and therefore would be close to existing facilities, employment areas, and public transport links. Bletchley has the density to support MRT and links to MRT routes could be added to cover this area. As with CMK, increasing population densities would be beneficial to support the viability of an MRT network. Some sites in this area are in proximity to conservation areas and NTHR nominations, but these can be considered on a case-by-case basis to mitigate impacts. There is generally low flood risk across the sites but potentially higher air pollution than in other site options so this would need to be considered at application stage.</p> <p>Possible issues with sites in Bletchley include viability (particularly with the need to significantly redevelop brownfield sites) and a possible lack of affordable housing in this area. The mix of new housing is also likely to be flats and apartments rather than family homes, and new developments will be reliant on market and council funding to come forward. However, this area is generally considered to be a sustainable location to direct growth and development here would meet many of the MK City Plan 2050 objectives.</p>									
Strategic Brownfield Redevelopments	++	++	++/-	++/-	++/-	++/-	+	+	++
<p>Summary: The strategic brownfield sites in this option are the redevelopment of the Open University (OU) Walton Hall campus, and the redevelopment of the former Wolverton Railway Works. It is considered that this growth option scores positively against the SA framework, indicating that these are sustainable locations to direct new growth in MK that would meet our MK City Plan 2050 objectives.</p> <p>These sites are located close to existing settlements and therefore benefit from the existing services and facilities nearby. The OU campus benefits from existing greenfield sites in addition to the brownfield elements of the site which would be redeveloped. The Wolverton Works site would also be in proximity to some pockets of existing greenspace, and it is considered that a new development on the site could make provision to develop new areas of greenspace to maximise walkable and people-friendly neighbourhoods. The sites are in good proximity to existing public transport links, with the Wolverton Works site also being linked to the proposed MRT routes, indicating good connectivity and the likelihood of reduced car dependency which is a significant positive. Both sites have the capacity to provide a suitable housing mix across the MK City Plan 2050 period and could potentially provide new employment areas.</p> <p>The OU campus is affected by increased 100 and 1000-year fluvial flood risk compared to other sites we have considered in the SA. However, strategic flood mitigation measures could be designed into the development.</p>									
Transport hubs	++	++	++	?	?	++	+	+	+/-
<p>Summary: Sites chosen for development along proposed MRT routes would generally be located relatively near to existing local centres or new MRT stops/hubs and would have good proximity to existing services and facilities. Individual sites within this option would likely be relatively small compared to other options, which would limit stress on the capacity of existing facilities. By their nature, transport hub development would be well-connected to transport links, Redways, and MRT routes. While sites would likely not include new employment areas due to their scale, new developments on transport hubs would likely be located near to existing employment areas.</p>									

There are also some uncertainties which are difficult to assess at this stage of plan preparation. The intention would be to deliver MRT ahead of or alongside housing developments, but the delivery plan for MRT remains unknown at this stage so it is unknown how quickly transport hub site options could come forward for development. Further work to clarify this, and their development potential, will continue to be undertaken during the preparation of the MK City Plan 2050. Sites under this option will need to be a certain scale to provide required densities to make MRT viable, but such developments would also need to be able to subsidise the MRT infrastructure, so there are uncertainties around the ability of these sites to provide affordable housing. As with Bletchley and CMK options, the housing mix in these areas would likely see a higher proportion of flats and apartments rather than larger, family housing.

Despite some uncertainties, the transport hubs option scores highly against many of the aspects of the SA framework and it is considered that this option would meet many of the MK City Plan 2050 objectives.

Small brownfield sites (windfall)	++	++	?	+	?	++/-	+	+	+/-
--	----	----	---	---	---	------	---	---	-----

Summary: Small brownfield and windfall sites within existing urban areas would generally be relatively close to existing local centres and would be well-connected to existing facilities. This type of site would typically be small, therefore limiting the stress on the capacity of services and facilities. Public transport connections would be highly dependent on location, but opportunities are greater than in rural areas. Whether an area would be connected to MRT routes would again be highly location dependent. Given the small scale of such sites, new employment areas are unlikely to be provided. However, sites would likely be relatively close to existing employment areas, so this is not a significant concern.

Most sites coming forward in this way are unlikely to be of a scale requiring affordable housing provision, with a lower proportion of affordable homes being assumed (although numbers cannot be confirmed at this stage). It is considered that housing from these sources could be provided across the plan period helping sustain housing supply throughout. Infrastructure is established in many areas already, so new developments in existing estates could come forward in the short to medium term of the MK City Plan 2050.

As small brownfield and windfall developments could potentially occur anywhere in MK, matters of heritage impacts, environmental pollution, flooding etc. would need to be considered on each individual case basis and can't accurately be assessed at this SA stage.

Eastern expansion	++	++/-	++/-	++/-	++	+/-	+	+	+/-
--------------------------	----	------	------	------	----	-----	---	---	-----

Summary: This growth option consists of several sites located to the east of the M1, adjacent to the existing Milton Keynes East (MKE) allocation in Plan:MK. This option generally scores highly across the SA framework which indicates that this is likely a sustainable option to direct growth. The sites here are large enough to provide essential infrastructure, including schools, local centres, health facilities and community facilities. This option consists of greenfield sites, which presents an opportunity to create neighbourhoods from scratch that are walkable and 'people-friendly' with good access to green space, in line with the MK City Plan 2050 objectives. The sites are large enough to be able to provide a suitable housing mix across the plan period and would be required to deliver our standards of affordable housing. While not currently on the emerging proposed MRT routes, there is the possibility that MRT routes could be extended into these sites as they come forward, with this being explored through further work. This would also benefit the potential employment areas in the site, ensuring they are well-connected with public transport modes. The scale of the sites would likely justify the provision of additional transport

infrastructure, including possible upgrades to bridges across the M1 to improve connectivity with Milton Keynes.

There are generally low levels of flood risk across the sites, and it would be possible to include strategic flood management and air pollution mitigation measures as part of new developments in this area. There are some instances of protected or sensitive species in this area and small sections of Priority Habitats and Ancient Woodlands which would need to be considered in any new developments. One of the sites within this option includes an area of Grade 2 agricultural land, but from information submitted with this option it is likely that this area would be removed from the developable area of the site.

There is some uncertainty surrounding the timescales of sites coming forward, as some would be reliant on infrastructure and development within the existing MKE allocation reaching a certain stage of delivery before they could be accessed and developed, and other sites would have cross-boundary considerations with Central Bedfordshire that would need to be taken into account. A positive consideration is that sites could come forward across different phases of the plan period, therefore this could contribute to ensuring that our medium- and longer-term housing needs are met.

South of Bow Brickhill	++	++/-	--/+	+/-	++	--	+	+	-
-------------------------------	----	------	------	-----	----	----	---	---	---

Summary: As with the Eastern expansion option, this option consists of greenfield sites, which presents an opportunity to ensure that neighbourhoods are walkable and ‘people-friendly’ with good access to green space, in line with the MK City Plan 2050 objectives. The site would be large enough to provide new facilities, including a local centre and primary school, and is in proximity to some existing employment areas including South Caldecotte. This growth option is a suitable scale to provide the housing mix we require across the MK City Plan 2050 period and would be able to deliver affordable housing in line with our requirements.

The sites within this option are relatively close to Bow Brickhill, Fenny Stratford and Bletchley rail stations. It is likely that walking, cycling and public transport routes would need to be upgraded and increased to serve new developments in this location. The sites would also not be served by the proposed MRT routes at this time.

A key consideration affecting this growth option is our emerging landscape evidence base which recommends that this area is included for designation within a new Brickhills Special Landscape Area (SLA) in the MK City Plan 2050. Areas designated as SLAs have higher landscape sensitivity and value and therefore this will impact upon how this growth option could be developed, as developments may need to be more limited to preserve landscape quality. However, designation as an SLA does not automatically rule out all development, and we consider that there are benefits to this site option which may outweigh the landscape sensitivity. If this option is to be taken forward for strategic allocation in the MK City Plan 2050, we could consider reducing the housing numbers to be delivered here and focus on a ‘landscape-led’ approach to development to mitigate detrimental impacts on valued landscapes.

Levante Gate	--/+	--/+	--/+	-	++	--	+	+	-
---------------------	------	------	------	---	----	----	---	---	---

Summary: This site option is located to the south of the South of Bow Brickhill option and south of the A5 McDonalds Roundabout. It raises many of the considerations as the South of Bow Brickhill option, including its location within the Brickhills SLA.

As a standalone site, this option performs relatively poorly against the SA framework. There are issues with the distance of this site from MK and the closest points of connection being the South Caldecotte and Eaton Leys extensions which are still in development. The scale of the site as a

standalone option is unlikely to support significant new services and facilities but could provide a new local centre and primary school. As with South of Bow Brickhill, a ‘landscape-led’ approach could be considered to mitigate against detrimental impacts on valued landscapes in this area.

East of Wavendon (post 2038 option)	++/-	++/-	+/-	+/-	++	+/-	+	+	-
--	------	------	-----	-----	----	-----	---	---	---

Summary: This growth area consists of two options which have been considered in the SA, one option is reduced in housing capacity but includes land to be allocated as a District Park. Both options could provide the housing mix needed to meet growth targets and would be able to meet our affordable housing requirements. These site options are close to existing amenities including local and town centres and have capacity to provide a primary and secondary school and potentially new health facilities. They would be greenfield sites, which would support the creation of walkable neighbourhoods and ‘people-friendly’ places in line with our MK City Plan 2050 objectives.

There are concerns relating to highways access to these sites, although there is the potential for extension of Keightley Gate into the site, particularly in the case of the option without the District Park which our Highways team notes would require two full forms of vehicle access to be a successful site option. This area may require an extension to the H10 grid road to improve connectivity, but this is complex as MKCC are not in control of the land to deliver this extension. There is the possibility of a future link into the proposed MRT routes, via Keightley Gate, however. Given the existing significant scale of planned development in this general area (e.g., SLA and SEMK) and its effects still be fully felt and understood (particularly in relation to infrastructure), and the possibility of this location offering a larger cross-boundary development, we consider that this option would likely come forward later in the MK City Plan period, post-2038. Some further potential issues include the proximity of sites to Scheduled Monuments (at intersection of Cross End and Newport Road) and Listed Buildings, but these could be considered on a case-by-case basis to mitigate impacts on heritage assets.

Western Expansion Area extension	--/+	++/-	--/+	-	++	--	+	+	-
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Summary: As with the other Strategic City Extensions, these sites would be on greenfield land and would therefore present an opportunity to ensure that neighbourhoods are walkable and ‘people-friendly’ with good access to green space, in line with the MK City Plan 2050 objectives. This area has good access to green infrastructure as existing, which could be retained in new developments.

There are issues with the suitability of this site as a possible Reasonable Alternative growth option. This area is poorly served by public transport links and the proposed MRT routes are unlikely to be extended to serve this area within the plan period. Some of the sites put forward in this area during the Call for Sites consultation were deemed ‘unsuitable’ at SHLAA stage, due to significant highways concerns relating to a lack of suitable access to these sites. The remaining parcels of land which are suitable in the SHLAA would still raise highways concerns, as sites would have poor connectivity to each other existing or planned built development and would result in ‘piecemeal’ development. In addition, there are doubts as to whether the remaining site areas deemed suitable in the SHLAA could be considered as sustainable strategic-scale growth options in the SA given their reduced scale.

Further issues are the proposed Calverton Plateau SLA which covers or is adjacent to most of the sites within this area. There are concerns that the proximity of these sites to the existing rural villages of Calverton and Upper, Middle and Lower Weald would necessitate consideration of ‘buffer zones’ to preserve the character of these settlements. This may further reduce the suitable developable area of these sites.

Shenley Dens	--/+	++/-	+/-	-	++	--	+	+	-
<p>Summary: This site option adjoins the WEA extension sites but has much greater connectivity to the existing or planned built development there. Therefore, the highways concerns are lesser than those for the the WEA option above, allowing it to be scored more favourably against the SA framework than the WEA option.</p> <p>The Shenley Dens site option would fall within the Calverton Plateau SLA, which raises consideration of impacts on landscapes and sensitive views in this area. Unlike the WEA extension option, impacts on rural villages would be less of an issue as the Shenley Dens site would be more distant from the villages of Calverton and the Upper, Middle and Lower Wealds. Overall, this site performs better than other options in the WEA due to its scale being able to provide greater housing numbers towards our growth targets, the benefits of which could be considered to outweigh some of the issues associated with development in this area.</p>									
West of Olney	+/-	++/-	--/+	-	++	--	+	+	+/-
<p>Summary: Positives of this site option include the proximity to greenspace and the existing greenfield nature of the sites, which promotes walkability and ‘people friendly’ places in line with our MK City Plan 2050 objectives. There is also minimal flood risk and a low level of environmental pollution in this area.</p> <p>While several sites in this location were submitted during the Call for Sites, not all were deemed to be suitable in the SHLAA assessment. The remaining ‘suitable’ sites would likely be too small and disconnected to be a strategic growth option. West of Olney sites are considered less preferable due to issues of highways access and impacts on the capacity of Yardley Road, Weston Road and the A509. It is unlikely that these sites would be connected to the proposed MRT routes during the MK City Plan 2050 period. It is considered that these sites would require a bypass to be implemented to support developments here. However, while these site options could potentially deliver around 1,000 new dwellings, helping to meet needs and offer a wide housing mix, this is unlikely to be enough to deliver a new bypass from a financial perspective. There is also uncertainty whether any route for a bypass would be acceptable in planning terms, considering landscape, flood risk and habitat matters. It is considered that new developments would have a degree of dependency on existing facilities in Olney, so the capacity of these facilities would need to be considered. The sites would not be of sufficient capacity to deliver a new secondary school which would be necessary, so these developments would be reliant on limited capacity within existing schools. The sites to the southern part of this area would also be affected by the Ouse Valley SLA, raising consideration of impacts on landscapes and sensitive views in this area.</p>									
MK North	++	++/-	--	+/-	++/-	--	+	+	--/+
<p>Summary: This site option is located close to, but separate from, the existing MK city boundary but is substantial enough to warrant consideration of this option as a new freestanding settlement. Positives of this option include the area being a greenfield site, which presents an opportunity to ensure that neighbourhoods are walkable and ‘people-friendly’ with good access to green space, in line with the MK City Plan 2050 objectives. The size of this site area would also justify requiring the provision of new health, education, and social infrastructure. The scale of this site option would be suitable to provide our requirements for housing mix and affordable housing provision over the MK City Plan 2050 period.</p> <p>However, this area has several issues which affect whether it would be a reasonable growth option. The SHLAA deemed this site essentially ‘unsuitable’, mainly due to significant issues with</p>									

accessibility and connectivity. This area is accessed from MK by rural roads that would not have the capacity to support strategic-scale development in this location. It would not be served by the proposed MRT routes, is poorly served by existing bus routes and is not on the existing Redway network. This means that significant transport infrastructure would need to be provided and upgraded to make this option suitable, which is likely to then affect the viability and deliverability of developments in this area. The negative impact of such large-scale transport infrastructure upon landscape and river corridors is also likely to be significant. We have therefore chosen to exclude this site option from consideration as a Reasonable Alternative growth option.

There are further concerns about the impact on landscapes. A large portion of the site area is within the proposed Ouse Valley SLA, with the remainder of the site potentially affecting the setting of the SLA. This affects proposed developments in this location due to the need to consider the sensitivity of landscapes. There are also several heritage sites located within the area, including Listed Buildings, archaeological notification sites and a Scheduled Monument. Developments here would also be affected by higher grade agricultural land (Grades 2 and 3) across large parts of the site.

Hardmead	--/+	++/-	--	+/-	++	-	+	+	--/+
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Summary: This site option is proposed as a new, freestanding settlement adjacent to MK. There are positives associated with access to greenspace and the ability to develop a new settlement that is walkable and people-friendly in line with our MK City Plan 2050 objectives.

The site would not be directly connected to MK’s boundary and has only a single road connection. This site would need to provide its own services, facilities, public transport, and potentially employment areas. This will likely have impacts on the deliverability of the site, and at this time there is no specific proposed solution or timeline for when this site could come forward for development in a sustainable way. There is no existing public transport serving this area from MK and no opportunity for a link into the proposed MRT routes is likely during the MK City Plan 2050 period. It is therefore a concern that the site would produce higher carbon emissions due to its remoteness, meaning that the private car would likely remain the primary mode of transport. At this time, the concerns around deliverability and sustainability may outweigh the benefits of a new settlement in proximity to MK. As a result, we have excluded this site option from consideration as a Reasonable Alternative growth option.

Expansion of villages	+/-	--/+	--	-	++/-	--	+	+	--
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Summary: This option generally does not score favourably against the SA framework. There are some opportunities to make use of the greenfield sites adjacent to existing villages with a view to increasing walkability and people-friendly places. However, there are significant issues with this option as a strategic growth strategy. Existing public transport links are poor, and these sites are served by rural road infrastructure which would likely require significant upgrade to be suitable to support new developments. Rural villages are usually sensitive to developments impacting on their character and some of the villages in MK would be affected by designation of SLAs, so development would likely impact on landscape character in these areas. Sites are likely to be small scale so would be unlikely to deliver suitable housing mix or affordable housing provision high enough to offset the drawbacks of these sites, as well larger scale social infrastructure such as new schools and health facilities. Overall, the evidence available to us currently does not justify inclusion of rural village expansion as a Reasonable Alternative within our growth strategy.

North of Newport Pagnell	--/+	+/-	--/+	--	++	--	+	+	-
<p>Summary: The main issues with this option include the deliverability of the site. It would effectively be a standalone site separate from options in and adjacent to the Eastern expansion site, existing MK East allocation, and Newport Pagnell itself. As it isn't large enough to be a new Freestanding Settlement, we have placed it into the 'Other' category of site/growth location in the 'long list'.</p> <p>While the scale of the site would allow for delivery of affordable housing and our desired housing mix, the site is unlikely to be developed in isolation from other options and would be reliant on growth in MKE and Eastern expansion sites being delivered first before it could be a viable option. The site is likely to be too small to justify the creation of a local centre or significant additional services, increasing its reliance on other sites coming forward to support development here. If the site were to be part of our growth strategy for the MK City Plan 2050, we consider that it would be most likely to come forward in the longer term of the plan period, but in reality, it is likely that the plan period would be too short for the site to be delivered. There is a current lack of public transport connectivity to this site, and infrastructure including footbridges over the River Ouse may be necessary to connect the site into Newport Pagnell. There are currently no significant walking or cycling links into Newport Pagnell from this site. The site is also separated from MKE growth options by the A509.</p> <p>This site area is located within the proposed Ouse Valley SLA. As with other options within an SLA, this affects proposed developments in this location due to the need to consider the sensitivity of landscapes.</p> <p>Positive aspects of this site include it being a greenfield site, which provides opportunities to increase walkability, access to green space and making the site 'people-friendly' in line with MK City Plan 2050 objectives. There is little environmental pollution or flood risk and there would be opportunities for strategic flood management to be designed into the site. However, these are not considered sufficient to outweigh the issues with this site as detailed above. For the reasons set out here it would be difficult to justify including this site in our growth strategy.</p>									
Regeneration estates*	?	?	?	?	?	?	?	?	?
<p><i>*The strategy for regeneration of estates is too uncertain at this stage to allow us to accurately test this option as a reasonable alternative against the SA framework. It has been included to indicate its potential as a growth option in MK.</i></p>									

2.76 Objective 7 seeks to support the creation of a zero-waste economy in MK and considers sites against their proximity to site waste management facilities. It is considered that each of the site options above would be within the catchment of household waste recycling centres in the MK borough, which is a positive, although not of significant benefit. Therefore, all sites are considered to have a minor positive impact against this objective.

2.77 Objective 8 considers the proximity of sites to water Source Protection Zones, in the interests of increasing water efficiency and quality. MK is in a water-stress zone; however, developments can be required to be delivered in line with water efficiency standards and therefore all sites are considered to have a minor positive impact against this objective.

2.78 Of the full 'long list' of options assessed, some are considered 'core' options which we are proposing to include in all versions of the growth strategy put forward in the MK City Plan

2050, given how they perform within the assessment align with our objectives. These ‘core’ options are **CMK, Bletchley**, and the **strategic brownfield redevelopments**. Including these site options within our strategic growth plan is a reasonable approach as it aligns with our development objectives and complies with the NPPF requirement to direct growth to sustainable locations. As shown above, these site options all generally score well against the SA framework objectives which indicates they are appropriate and sustainable locations for growth.

Commercial Development Sites

- 2.79** In terms of commercial development, our CMK Growth Opportunity Study has identified opportunities for around 300,000 square metres of office floorspace within the ‘Downtown’ quarter around the railway station. This location aligns with both occupier and policy requirements for directing office development to town centres, and the area around the railway station is an accessible and well-connected location for business and workers. Outside of CMK, our established employment sites (some of which are still vacant) and certain Strategic City Extension and Freestanding Settlement options do provide opportunities for new employment land to support the creation of high-quality jobs in different sectors. This is explained in greater detail within the Employment Land Study. 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.
- 2.80** Central Milton Keynes is already a regional centre for retail and leisure with the Shopping Centre and Xscape areas providing a wide offer of comparison retail and leisure. Our Call for Sites and Land Availability Assessment has not identified any significant new sites for retail and leisure that could be allocated in the MK City Plan 2050. However, we expect that, subject to market demand, additional floorspace could come forward within our Primary Shopping Areas and town centres in accordance with supportive planning policy that seeks to protect and enhance the role of CMK as a regionally importance centre.

Step 3 – Growth Scenarios

2.81 One of the objectives of the SA process is to establish a reasonable range of alternative site combinations, or ‘packages’ of site options, where each package of sites would meet our growth target of 53,000-63,000 homes.

2.82 Following Steps 1 and 2, we have established 4 Reasonable Alternative growth options/scenarios. Reasonable Alternatives are alternative ways in which the MK City Plan 2050 objectives could reasonably be achieved. The Reasonable Alternative growth scenarios and their estimated housing capacities are set out in Table 2.4. Each growth scenario is shown on a map in Figures 2.7-2.10.

2.83 Whilst the Freestanding Settlement options have been assessed in Table 2.3, and in certain respects perform well, the fundamental issues or doubts associated with their suitability and deliverability mean they cannot reasonably be proposed as deliverable allocations. As such they have been excluded from our Reasonable Alternatives for SA purposes.

Table 2.4: Reasonable Alternative Growth Options		
Reasonable Alternative (RA) 1		
Site Option(s)	Estimated Max Capacity	Expected Delivery by 2050
Existing Commitments and Completions 2022-2050	29,075	29,075
CMK	15,000	11,000
Central Bletchley	1,000	1,000
Strategic brownfield site (Wolverton Works)	400	400
Strategic brownfield site (Walton Campus)	1,600	1,600
Eastern Strategic City Extension	16,000	7,500
South of Bow Brickhill Strategic City Extension	1,500	1,500
Levante Gate Strategic City Extension	1,250	1,250
Shenley Dens Strategic City Extension	1,000	1,000
East of Wavendon Strategic City Extension (post 2038 option)	3,000	3,000
Transport Hubs	10,000	2,500
Other small and brownfield sites (windfall)	3,000	3,000
Estimated Total:	82,825	62,825
Reasonable Alternative 2: Same as RA 1 but Remove sites affected by Special Landscape Areas (South of Bow Brickhill, Levante Gate, Shenley Dens)		
Site Option(s)	Estimated Max Capacity	Expected Delivery by 2050
Existing Commitments and Completions 2022-2050	29,075	29,075
CMK	15,000	11,000
Central Bletchley	1,000	1,000
Strategic brownfield site (Wolverton Works)	400	400
Strategic brownfield site (Walton Campus)	1,600	1,600

Eastern Strategic City Extension	16,000	7,500
East of Wavendon Strategic City Extension (post 2038 option)	3,000	3,000
Transport Hubs	10,000	2,500
Other small and brownfield sites (windfall)	3,000	3,000
Estimated Total:	79,075	59,075
Reasonable Alternative 3: Same as RA 1 but Remove sites affected by Special Landscape Areas (South of Bow Brickhill, Levante Gate, Shenley Dens) and add West of Olney		
Site Option(s)	Estimated Max Capacity	Expected Delivery by 2050
Existing Commitments and Completions 2022-2050	29,075	29,075
CMK	15,000	11,000
Central Bletchley	1,000	1,000
Strategic brownfield site (Wolverton Works)	400	400
Strategic brownfield site (Walton Campus)	1,600	1,600
Eastern Strategic City Extension	16,000	7,500
East of Wavendon Strategic City Extension (post 2038 option)	3,000	3,000
Transport Hubs	10,000	2,500
Other small and brownfield sites (windfall)	3,000	3,000
West of Olney Key Settlement Expansion	1,000	1,000
Estimated Total:	80,075	60,075
Reasonable Alternative 4: Same as RA 1 but Remove East of Wavendon and add West of Olney		
Site Option(s)	Estimated Max Capacity	Expected Delivery by 2050
Existing Commitments and Completions 2022-2050	29,075	29,075
CMK	15,000	11,000
Central Bletchley	1,000	1,000
Strategic brownfield site (Wolverton Works)	400	400
Strategic brownfield site (Walton Campus)	1,600	1,600
Eastern Strategic City Extension	16,000	7,500
South of Bow Brickhill Strategic City Extension	1,500	1,500
Levante Gate Strategic City Extension	1,250	1,250
Shenley Dens Strategic City Extension	1,000	1,000
Transport Hubs	10,000	2,500
Other small and brownfield sites (windfall)	3,000	3,000
West of Olney Key Settlement Expansion	1,000	1,000
Estimated Total:	80,825	60,825

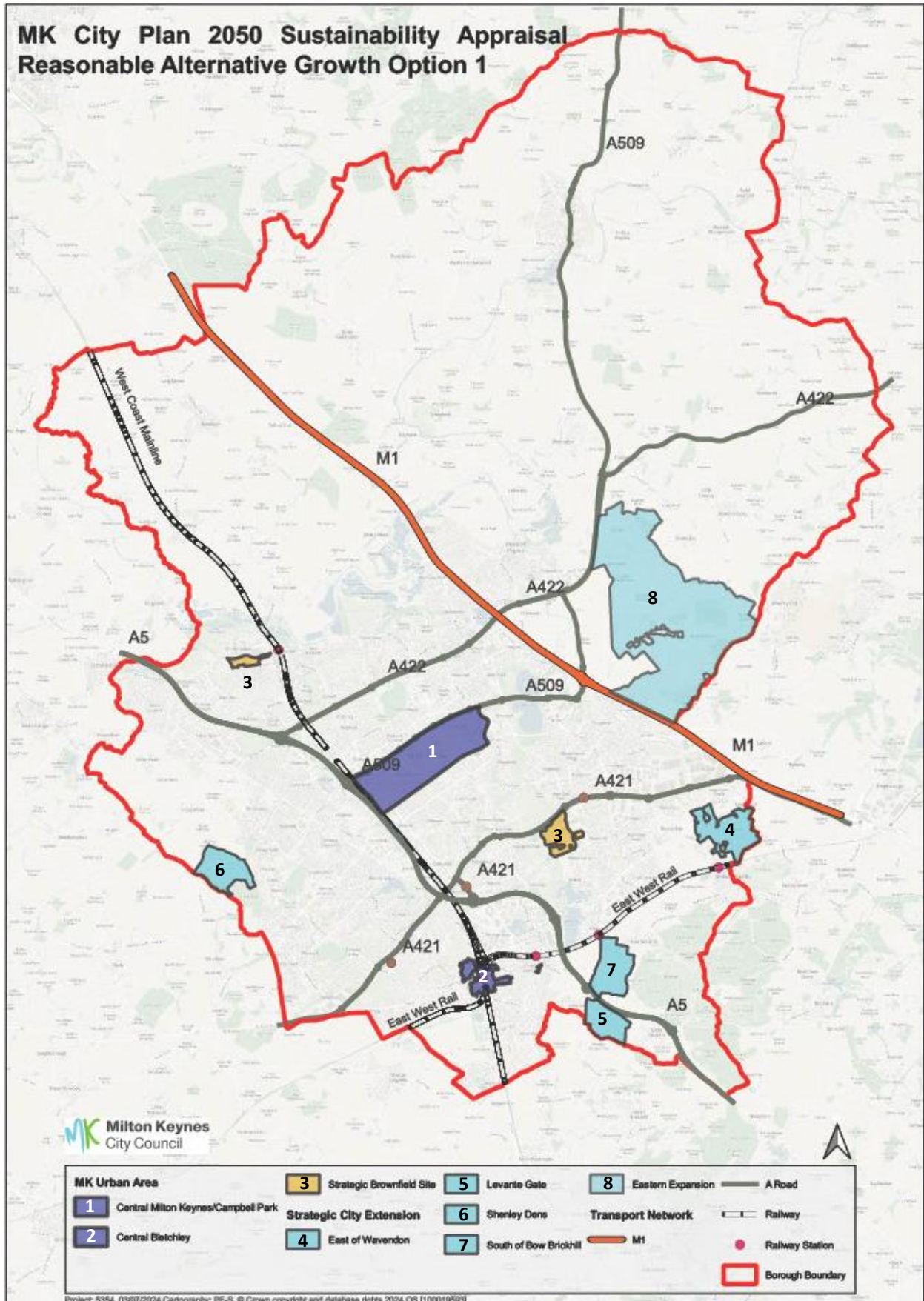


Figure 2.7: Map of Reasonable Alternative 1

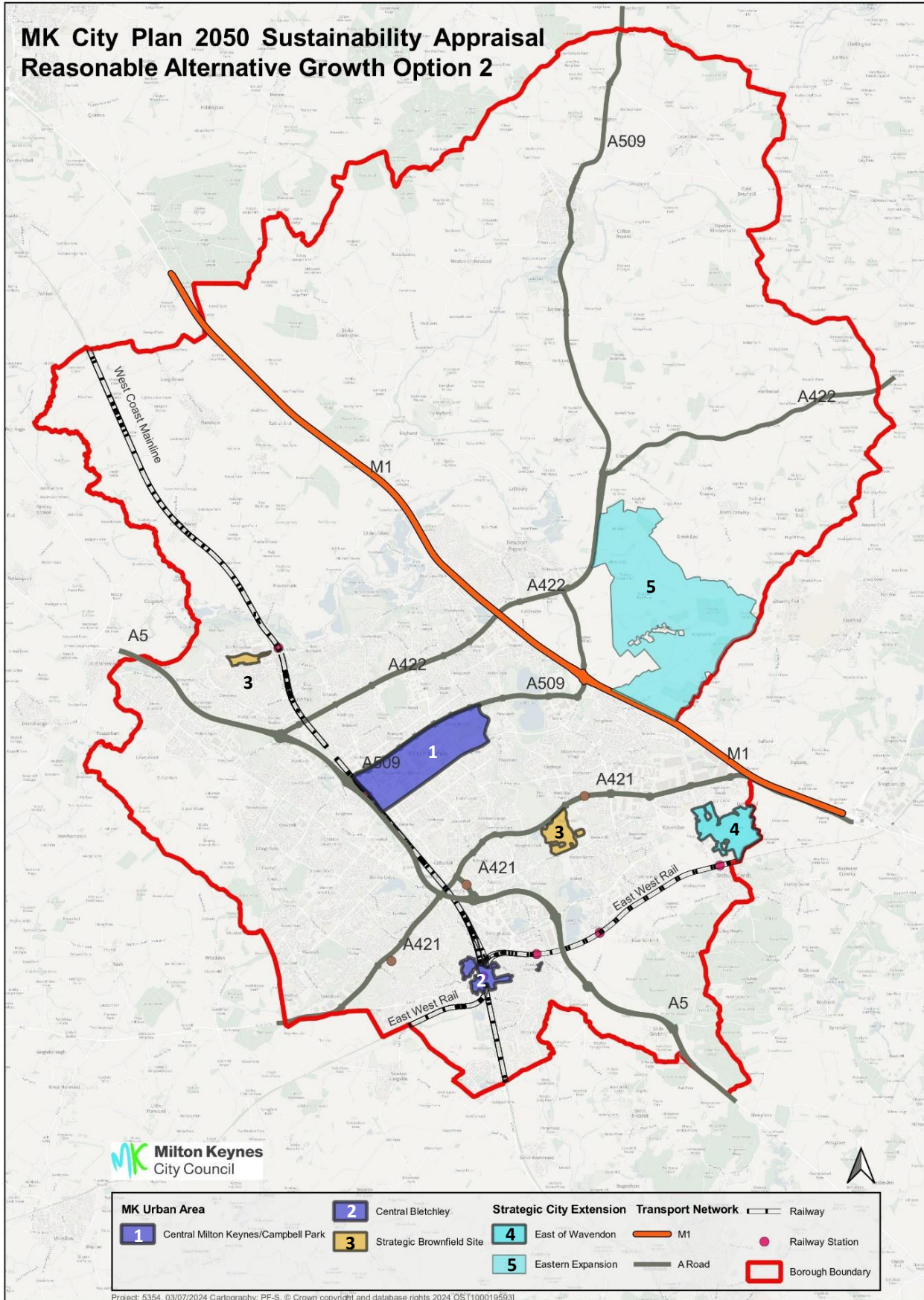


Figure 2.8: Map of Reasonable Alternative 2

MK City Plan 2050 Sustainability Appraisal Reasonable Alternative Growth Option 3

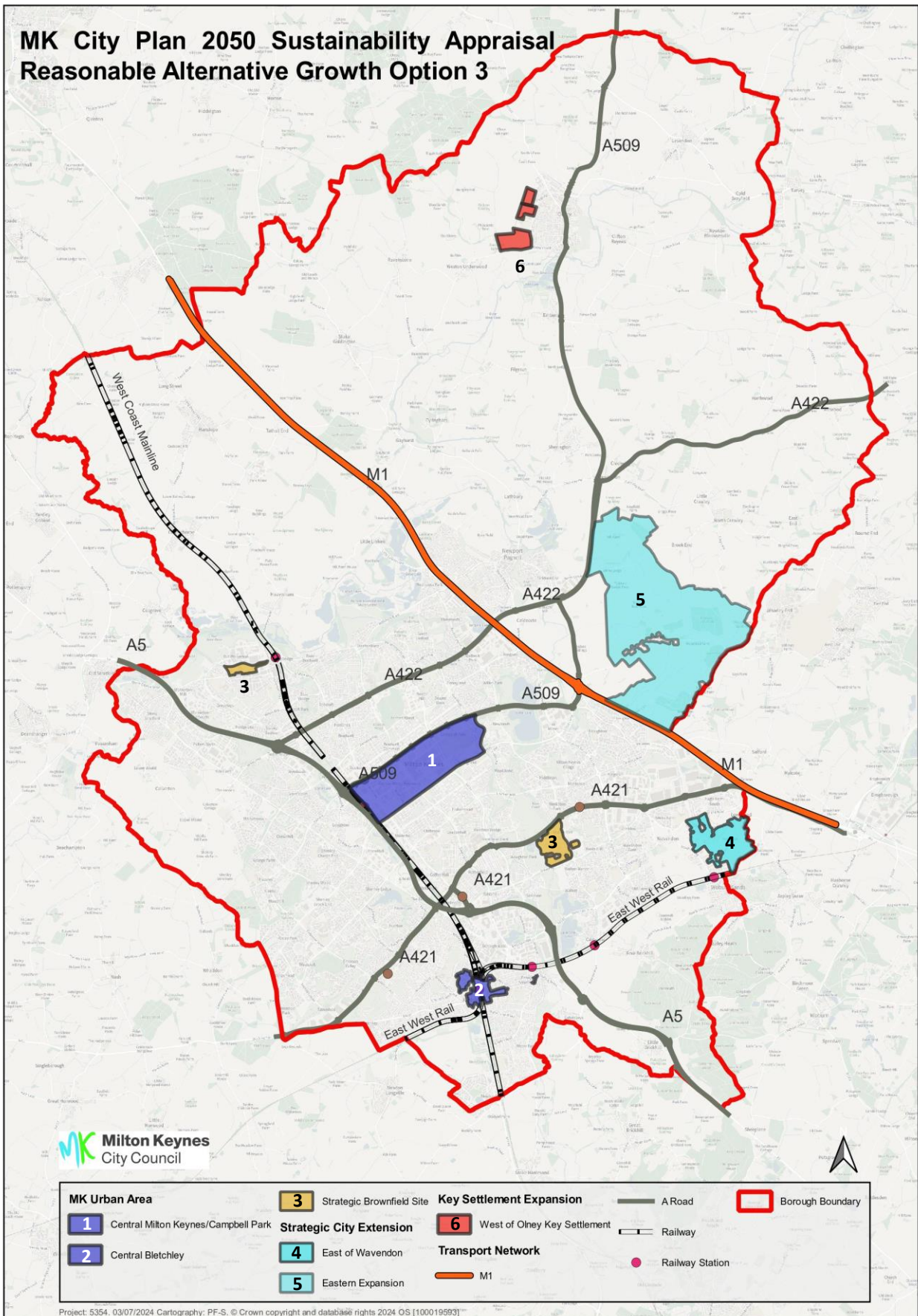


Figure 2.9: Map of Reasonable Alternative 3

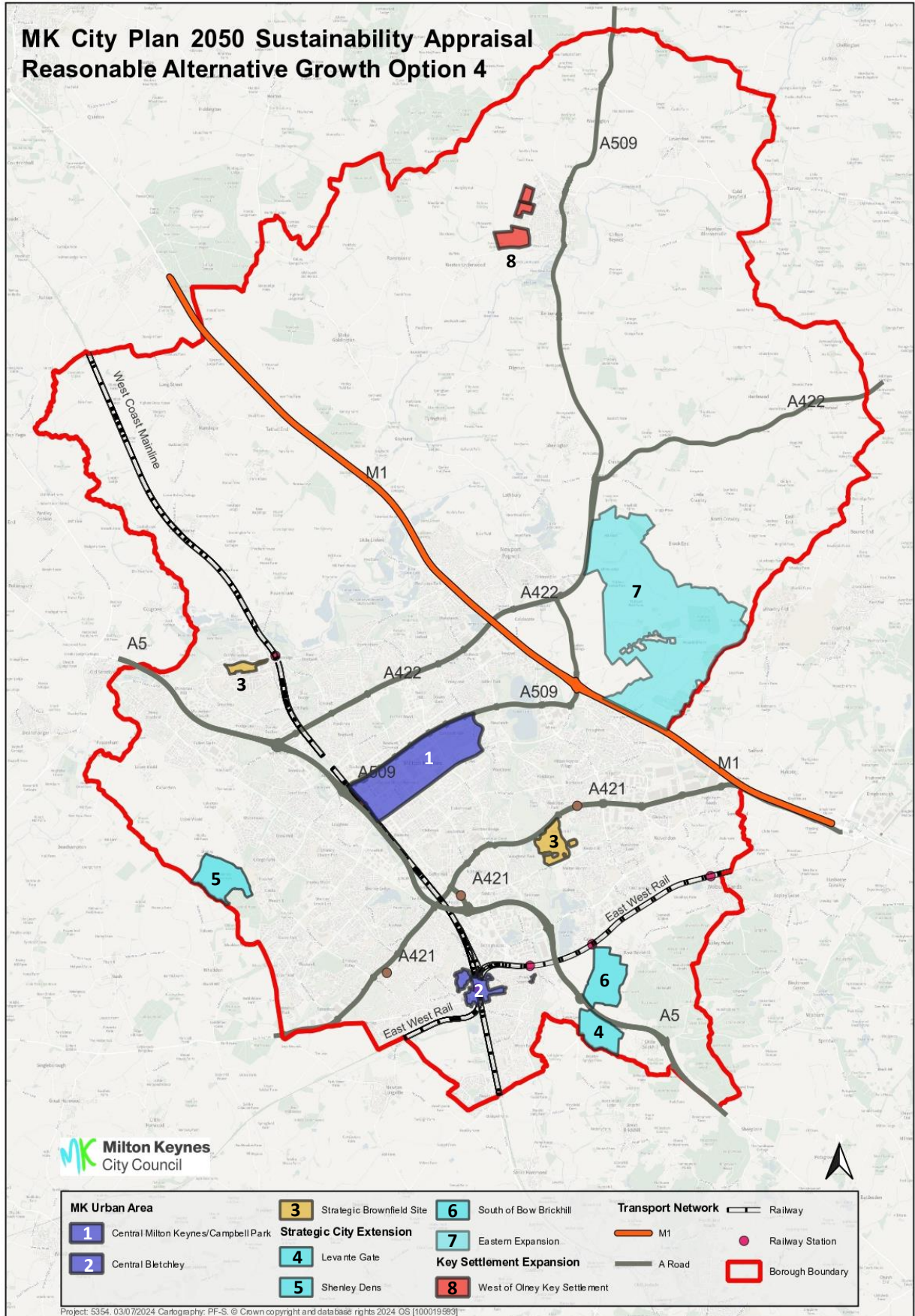


Figure 2.10: Map of Reasonable Alternative 4

Appraising Reasonable Alternatives

- 3.1** The 4 Reasonable Alternative (RA) housing growth options identified in Chapter 2 have been tested against the SA framework objectives to assess their overall performance as a 'package' of options in meeting our growth targets and sustainability objectives (see Table 2.5). It should be noted that the scores are intended as a tool to indicate expected performance against a particular SA objective, but scores are not the only consideration when selecting the preferred growth strategy. Where applicable, a planning judgement will be applied to give differing levels of 'weight' to certain considerations, such as deliverability of sites within the MK City Plan 2050 period, depending on the context of the site options within each RA.

Table 2.5: Appraisal of Reasonable Alternative Growth Options		
Reasonable Alternative (RA) 1		
<p>Summary: This Reasonable Alternative growth scenario contains a mixture of brownfield and greenfield sites which would have the capacity to exceed our minimum housing targets, as well as virtually meeting top end of our housing growth target (63,000 homes). This package of options is considered the most likely to be deliverable across the plan period and generally performs well across the SA framework. This indicates that the growth strategy set out in this Reasonable Alternative scenario would be sustainable and would contribute to delivering the objectives of the MK City Plan 2050.</p>		
SA Objective	Score	Commentary
1	++	This RA scenario includes sites that are generally close to existing facilities or are greenfield sites large enough to provide new facilities. This supports the walkability of neighbourhoods in new and existing areas.
2	++/-	This RA performs favourably overall in terms of improvements to physical and mental health. Greenfield sites can easily support access to green infrastructure and provide new health facilities. Brownfield sites generally do have access to existing greenspace although quality and quantity could be improved, particularly in CMK and Bletchley sites. Capacity of health facilities in existing areas needs to be considered.
3	++/-	Most sites in this RA have good connections to existing public transport which supports our aims to minimise car dependency. There is some uncertainty over whether MRT could be delivered at some sites and some additional public transport is likely to be needed across other sites in this option, particularly the greenfield developments, but the scale of potential developments would likely justify provision of additional transport infrastructure.
4	++/-	The site options in this RA can largely provide the housing mix and affordable housing numbers we require across the MK City Plan 2050 period, although it is unknown at this stage when each site could come forward for development. CMK and Bletchley sites may have difficulties providing affordable housing due to viability issues, and housing mixes here are likely to be majority flats and apartments. However, financial contributions could be secured from these developments to provide council housing elsewhere.
5	++	There are few environmental concerns with this growth scenario. Most sites are not within existing Flood Zones, and it is considered that 100 year and 1000-year flood risk is not excessive and could be mitigated through inclusion of strategic flood risk measures in new developments. The reuse of some areas of brownfield land in CMK and Bletchley would also be a positive.
6	+/-	The sites in this growth scenario may have some impact on heritage assets, so this would need to be considered on a case-by-case basis as developments come forward. As identified in the individual site assessments, Shenley Dens, South of Bow Brickhill and Levante Gate sites raise landscape considerations due to the Brickhills SLA covering these areas. However, designation as an

		SLA does not mean that appropriate development cannot come forward. If this option is to be taken forward for strategic allocation in the MK City Plan 2050, we could consider reducing the housing numbers (from the the notional suitable capacity of the sites) to be delivered here and focus on a 'landscape-led' approach to development to mitigate detrimental impacts on valued landscapes. Some sites, including those in the Eastern Strategic City Extension, would include areas of higher-grade Agricultural Land, but these areas could be excluded from the developable area of new developments.
7	+	This objective seeks to support the creation of a zero-waste economy in MK and considers sites against their proximity to site waste management facilities. It is considered that the site options in this growth scenario would be within the catchment of household waste recycling centres in the MK borough, which is a positive, although not of significant benefit.
8	+	This objective considers the proximity of sites to water Source Protection Zones, in the interests of increasing water efficiency and quality. MK is in a water-stress zone; however, developments can be required to be delivered in line with water efficiency standards and therefore this growth scenario is considered to have a minor positive impact against this objective.
9	++/-	This RA scenario includes sites that are generally close to existing employment areas or are greenfield sites large enough to provide new employment areas in new developments. However, the size of new employment areas is still unknown at this stage. New higher education facilities are proposed for CMK which is a strong positive against this objective. Public transport links to existing employment areas vary across this growth scenario with some areas having more limited access.
Reasonable Alternative 2: Same as RA 1 but Remove sites affected by Special Landscape Areas (South of Bow Brickhill, Levante Gate, Shenley Dens)		
Summary: This Reasonable Alternative scenario would remove the South of Bow Brickhill, Levante Gate, and Shenley Dens sites. The sites removed are all within areas proposed to be designated as SLAs, resulting in less concerns around landscape impacts. This alternative growth scenario generally scores positively across the SA framework and would be able to deliver our minimum housing target of 53,000 homes. However, it would have a reduced capacity compared to RA 1, which would fall substantially below our aspirational growth target of 63,000 homes and result in fewer affordable homes being delivered in comparison to RA 1. This option would also be less preferable as the removal of these sites would reduce the diversity of housing supply that could come forward over the MK City Plan 2050 period.		
SA Objective	Score	Commentary
1	++/-	This RA scenario includes sites that are generally close to existing facilities or are greenfield sites large enough to provide new facilities. This supports the walkability of neighbourhoods in new and existing areas. Some greenfield sites would need to deliver their own community and leisure facilities.
2	++/-	This RA performs favourably overall in terms of improvements to physical and mental health. Greenfield sites can easily support access to green infrastructure and provide new health facilities.

		Brownfield sites generally do have access to existing greenspace although quality and quantity could be improved, particularly in CMK and Bletchley sites. Capacity of health facilities in existing areas needs to be considered.
3	++/-	Most sites in this RA have good connections to existing public transport which supports our aims to minimise car dependency. There is some uncertainty over whether MRT could be delivered at some sites and some additional public transport is likely to be needed across other sites in this option, particularly the greenfield developments, but the scale of potential developments would likely justify provision of additional transport infrastructure.
4	-/+	The sites in this growth scenario can provide for our minimum housing targets but would fall substantially short of the aspirational targets of the Strategy for 2050. Removing the South of Bow Brickhill, Levante Gate and Shenley Dens sites would reduce the variety of housing mix and potentially the proportion of affordable housing that could be provided for over the plan period. CMK and Bletchley sites may have difficulties providing affordable housing due to viability issues, and housing mixes here are likely to be majority flats and apartments. However, financial contributions could be secured from these developments to provide council housing elsewhere.
5	++	There are few environmental concerns with this growth scenario. Most sites are not within existing Flood Zones, and it is considered that 100 year and 1000-year flood risk is not excessive and could be mitigated through inclusion of strategic flood risk measures in new developments. The reuse of some areas of brownfield land in CMK and Bletchley would also be a positive.
6	++/-	This RA scenario performs more favourably in terms of preserving natural heritage, as it removes the sites from RA1 which would be affected by an SLA designation. The sites in this growth scenario may have some impact on heritage assets, so this would need to be considered on a case-by-case basis as developments come forward. Some sites, including those in the Eastern Strategic City Extension, would include areas of higher-grade Agricultural Land, but these areas could be excluded from the developable area of new developments.
7	+	This objective seeks to support the creation of a zero-waste economy in MK and considers sites against their proximity to site waste management facilities. It is considered that the site options in this growth scenario would be within the catchment of household waste recycling centres in the MK borough, which is a positive, although not of significant benefit.
8	+	This objective considers the proximity of sites to water Source Protection Zones, in the interests of increasing water efficiency and quality. MK is in a water-stress zone; however, developments can be required to be delivered in line with water efficiency standards and therefore this growth scenario is considered to have a minor positive impact against this objective.

9	++/-	This RA scenario includes sites that are generally close to existing employment areas or are greenfield sites large enough to provide new employment areas in new developments. However, the size of new employment areas is still unknown at this stage. New higher education facilities are proposed for CMK which is a strong positive against this objective. Public transport links to existing employment areas vary across this growth scenario with some areas having more limited access.
Reasonable Alternative 3: Same as RA 1 but Remove sites affected by Special Landscape Areas (South of Bow Brickhill, Levante Gate, Shenley Dens) and add West of Olney		
Summary: This Reasonable Alternative scenario would remove the South of Bow Brickhill, Levante Gate, and Shenley Dens sites and add the West of Olney option. The sites removed are all within areas proposed to be designated as SLAs, but the southern parts of the West of Olney option would also be affected by an SLA. Therefore, we consider that there would be a similar impact on landscapes under this scenario. This alternative growth scenario would be able to deliver our minimum housing target of 53,000 homes and would be capable of delivering slightly greater housing numbers than RA 2. However, it would still have a reduced capacity compared to RA 1, falling substantially below our aspirational growth target of 63,000 homes. In addition, West of Olney sites are sequentially less preferable than other options due to highways concerns of the capacity of Yardley Road, Weston Road and the A509 and uncertainty surrounding new significant highway infrastructure that would be needed as mitigation.		
SA Objective	Score	Commentary
1	++/	This RA scenario includes sites that are generally close to existing facilities or are greenfield sites large enough to provide new facilities. This supports the walkability of neighbourhoods in new and existing areas. Some greenfield sites would need to deliver their own community and leisure facilities. West of Olney sites would be more distant from local centres in the MK urban area so would be reliant on facilities in Olney.
2	++/-	This RA performs favourably overall in terms of improvements to physical and mental health. Greenfield sites can easily support access to green infrastructure and provide new health facilities. Brownfield sites generally do have access to existing greenspace although quality and quantity could be improved, particularly in CMK and Bletchley sites. Capacity of health facilities in existing areas needs to be considered.
3	-/+	Most sites in this RA have good connections to existing public transport which supports our aims to minimise car dependency. There is some uncertainty over whether MRT could be delivered at some sites and some additional public transport is likely to be needed across other sites in this option, particularly the greenfield developments, but the scale of potential developments would likely justify provision of additional transport infrastructure. West of Olney sites are sequentially less preferable than other options due to highways concerns of the capacity of Yardley Road, Weston Road and the A509. It is also considered that West of Olney development would require a bypass to mitigate traffic impacts on Olney and make development here acceptable. However, the small scale of the site would be unlikely to fund such significant highways

		infrastructure, and there would be uncertainty over whether the highway infrastructure would be acceptable in planning terms due to landscape, flood risk and habitat considerations.
4	--/+	The sites in this growth scenario can provide for our minimum housing targets but would fall substantially short of the aspirational targets of the Strategy for 2050. Removing the South of Bow Brickhill, Levante Gate and Shenley Dens sites would reduce the variety of housing mix and potentially the proportion of affordable housing that could be provided for over the plan period. This would not be offset by West of Olney development due to the small scale of sites there. CMK and Bletchley sites may have difficulties providing affordable housing due to viability issues, and housing mixes here are likely to be majority flats and apartments. However, financial contributions could be secured from these developments to provide council housing elsewhere.
5	++	There are few environmental concerns with this growth scenario. Most sites are not within existing Flood Zones, and it is considered that 100 year and 1000-year flood risk is not excessive and could be mitigated through inclusion of strategic flood risk measures in new developments. The reuse of some areas of brownfield land in CMK and Bletchley would also be a positive.
6	+/-	This RA scenario would remove some sites affected by an SLA but would replace with West of Olney which would also be located within or in the setting of the Ouse Valley SLA. While designation as an SLA does not prevent all development in an area, we consider that this would need to be outweighed by substantial benefits brought forward by developments. In this case, the smaller scale of the West of Olney sites would not bring sufficient growth benefits to justify the landscape concerns or to make a landscape-led development viable. The sites in this growth scenario may also have some impact on heritage assets, so this would need to be considered on a case-by-case basis as developments come forward. Some sites, including those in the Eastern Strategic City Extension, would include areas of higher-grade Agricultural Land, but these areas could be excluded from the developable area of new developments.
7	+	This objective seeks to support the creation of a zero-waste economy in MK and considers sites against their proximity to site waste management facilities. It is considered that the site options in this growth scenario would be within the catchment of household waste recycling centres in the MK borough, which is a positive, although not of significant benefit.
8	+	This objective considers the proximity of sites to water Source Protection Zones, in the interests of increasing water efficiency and quality. MK is in a water-stress zone; however, developments can be required to be delivered in line with water efficiency standards and therefore this growth scenario is considered to have a minor positive impact against this objective.
9	++/-	This RA scenario includes sites that are generally close to existing employment areas or are greenfield sites large enough to provide new employment areas in new developments. However, the size

		of new employment areas is still unknown at this stage. New higher education facilities are proposed for CMK which is a strong positive against this objective. Public transport links to existing employment areas vary across this growth scenario with some areas having more limited access.
Reasonable Alternative 4: Same as RA 1 but Remove East of Wavendon and add West of Olney		
Summary: This Reasonable Alternative scenario would remove the East of Wavendon option and add the West of Olney option. This scenario would be less preferable as there would be additional landscape concerns from the southern parts of the West of Olney option being within a proposed SLA. The East of Wavendon option would not be within an SLA and therefore would have fewer landscape concerns. This alternative growth scenario would be able to deliver our minimum housing target of 53,000 homes and would be capable of delivering slightly greater housing numbers than RA 2 or 3. However, it would still have a reduced capacity compared to RA 1, falling below our aspirational growth target of 63,000 homes. In addition, West of Olney sites are sequentially less preferable than other options due to highways concerns of the capacity of Yardley Road, Weston Road and the A509.		
SA Objective	Score	Commentary
1	++/-	This RA scenario includes some sites that are generally close to existing facilities or are greenfield sites large enough to provide new facilities. This supports the walkability of neighbourhoods in new and existing areas. However, West of Olney and Shenley Dens sites are more isolated from local centres and would not be of a sufficient size to provide their own. Additional infrastructure is likely to be required for connectivity into other areas and to make these sites walkable, although they are greenfield sites so this could be designed in at application stage.
2	+/-	Greenfield sites in this RA can generally support access to green infrastructure and provide new health facilities, although West of Olney site unlikely to have the capacity for new facilities and East of Wavendon site would have had the capacity for this, making RA4 a potentially less preferable option. Brownfield sites generally do have access to existing greenspace although quality and quantity could be improved. Capacity of health facilities in existing areas needs to be considered.
3	--/+	Several sites in this RA scenario have good connections to existing public transport which supports our aims to minimise car dependency. The West of Olney site may require significant transport infrastructure upgrades to support development. While other sites in this RA scenario may have the capacity to justify further infrastructure, the West of Olney site would be of a more limited scale and unlikely to fund such significant highways infrastructure. There would also be uncertainty over whether the highway infrastructure would be acceptable in planning terms due to landscape, flood risk and habitat considerations. It is therefore considered less preferable due to issues of highways access and impacts on the major road capacity. It is unlikely that the alternative sites in this RA scenario would be connected to the proposed MRT routes during the MK City Plan 2050 period.

4	--/+	The site options in this RA vary as to whether they could provide the housing mix and affordable housing numbers we require across the MK City Plan 2050 period. There are also concerns of when each site could come forward for development. CMK and Bletchley sites may have difficulties providing affordable housing due to viability issues, and housing mixes here are likely to be majority flats and apartments. West of Olney sites are piecemeal and may struggle to provide a suitable housing mix or sufficient affordable housing. Removal of East of Wavendon from the growth options also reduces the housing offering towards the later end of the plan period.
5	++	There are few environmental concerns with this growth scenario. Most sites are not within existing Flood Zones, and it is considered that 100-year and 1000-year flood risk is not excessive and could be mitigated through inclusion of strategic flood risk measures in new developments. The reuse of some areas of brownfield land in CMK and Bletchley would also be a positive.
6	--/+	The sites in this growth scenario may have some impact on heritage assets, so this would need to be considered on a case-by-case basis as developments come forward. As identified in the individual site assessments, South of Bow Brickhill, Levante Gate, Shenley Dens and West of Olney sites raise landscape considerations due to the Brickhills and Ouse Valley SLAs covering these areas. Designation as an SLA does not mean that appropriate development cannot come forward; however, in the case of West of Olney particularly, the smaller scale of these sites and their deliverability concerns would have fewer benefits than other growth scenarios and therefore development in this area is unlikely to be sufficient to outweigh the landscape sensitivity issues. Some sites, including those in the Eastern Strategic City Extension, would include areas of higher-grade Agricultural Land, but these areas could be excluded from the developable area of new developments.
7	+	This objective seeks to support the creation of a zero-waste economy in MK and considers sites against their proximity to site waste management facilities. It is considered that the site options in this growth scenario would be within the catchment of household waste recycling centres in the MK borough, which is a positive, although not of significant benefit.
8	+	This objective considers the proximity of sites to water Source Protection Zones, in the interests of increasing water efficiency and quality. MK is in a water-stress zone; however, developments can be required to be delivered in line with water efficiency standards and therefore this growth scenario is considered to have a minor positive impact against this objective.
9	+/-	This RA scenario includes sites that are generally close to existing employment areas or are greenfield sites large enough to provide new employment areas in new developments. However, the size of new employment areas is still unknown at this stage. New higher education facilities are proposed for CMK which is a strong positive. Public transport links to existing employment areas vary

		across this growth scenario with some areas having much more limited access.
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- 3.2** From the assessment of the Reasonable Alternative housing growth scenarios in the table above, we have selected a Preferred Approach to our housing strategy. This is set out in Chapter 4 of this report.

Developing the Preferred Approach

Our Preferred Approach

Housing Strategy

- 4.1** Our proposed preferred housing site options were presented to Cabinet Advisory Group (CAG) in February 2024. However, work was ongoing to test and refine the options in line with our emerging evidence base and SA process. This has resulted in a different set out preferred options being contained in the Regulation 18 plan. Further consideration will be given to the preferred approach and reasonable alternatives following the Regulation 18 consultation on the draft MK City Plan 2050.
- 4.2** Based on our evidence and the appraisal of Reasonable Alternative growth scenarios in chapter 3, **Reasonable Alternative 1** best aligns with our plan objectives and performs best against the SA Framework, is an appropriate strategy to follow, and is therefore our Preferred Growth Strategy. The benefits of Reasonable Alternative 1 against our SA and plan objectives are summarised below.
- 4.3** The Preferred Growth Strategy can deliver **62,625 homes** which matches our ambition for growth and ensures an ample buffer is provided so that we will deliver against our Local Housing Need of 53,256 homes by 2050.
- 4.4** The Preferred Growth Strategy has a mix of very large to relatively smaller scale strategic sites and a small but not insignificant allowance for smaller brownfield and windfall sites. Together, these are eminently deliverable and do not face significant infrastructure uncertainties, unlike other Reasonable Alternatives (particularly those involving West of Olney). 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. The Preferred Growth Option would avoid piecemeal development in the rural area, growth which would produce higher cumulative carbon emissions, 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.

- 4.5** The Preferred Growth Strategy contains a very large growth location (Eastern Strategic City Extension at around 16,000 homes in total) which is of a scale that would dwarf almost all others in England. Ordinarily, an allocation like this would be seen as a new settlement separate from existing built development and infrastructure that would take many years to masterplan and commence. However, the Eastern Strategic City Extension would be an extension to the current city, as a continuation of infrastructure-led growth occurring in Milton Keynes East. Further work is required to understand the concept of this growth location, but it can nonetheless tap into and complement new infrastructure coming forward through Milton Keynes East in its early phases, allowing growth here to come forward quicker than might ordinarily be the case for such a large-scale site. Meanwhile, the Preferred Growth Strategy contains smaller and more readily developable strategic sites (including sites within CMK and Bletchley) that can boost housing supply in the short to medium term of the plan period as current growth under Plan:MK begins to tail off. Towards the end of the plan period, the East of Wavendon Strategic City Extension would then begin to add further housing supply in the latter part of the plan period. Overall, this approach should enable a consistent level of housing supply and delivery over the plan period.
- 4.6** The Preferred Growth Strategy contains around 14,250 homes coming forward on strategic greenfield sites. The Whole Plan Viability Study indicates that these sites can provide up to 40% of homes as affordable alongside other planning obligations and infrastructure and are likely to provide a greater share of family homes than the core growth locations are likely to. Coupled with affordable housing coming forward through existing commitments and new urban sites in the city, the Preferred Growth Strategy can provide around 16,800 affordable homes. This is more than the identified need of 14,331 affordable homes, and around 32% of the Local Housing Need of 53,256 homes.
- 4.7** A key SA objective, and objective of the plan, 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 (or urban areas more generally) is potentially less resilient to climate change than other options, namely due to urban heat island effects. Of the Reasonable Alternatives assessed, 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 between reducing cumulative carbon emissions from growth whilst ensuring growth overall is as resilient to a changing climate as it can be.

4.8 The Preferred Growth Strategy does entail growth in locations that are more landscape-sensitive, with growth directed to areas in the Brickhills and Calverton Sensitive Landscape Areas. 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 Sensitive Landscape Areas. Taken with the positive effects of these options, and on balance with other considerations, they represent sustainable options for growth and capable of forming part of an appropriate strategy.

4.9 Figure 4.1 shows a map of the Preferred Growth Strategy for the MK City Plan 2050.

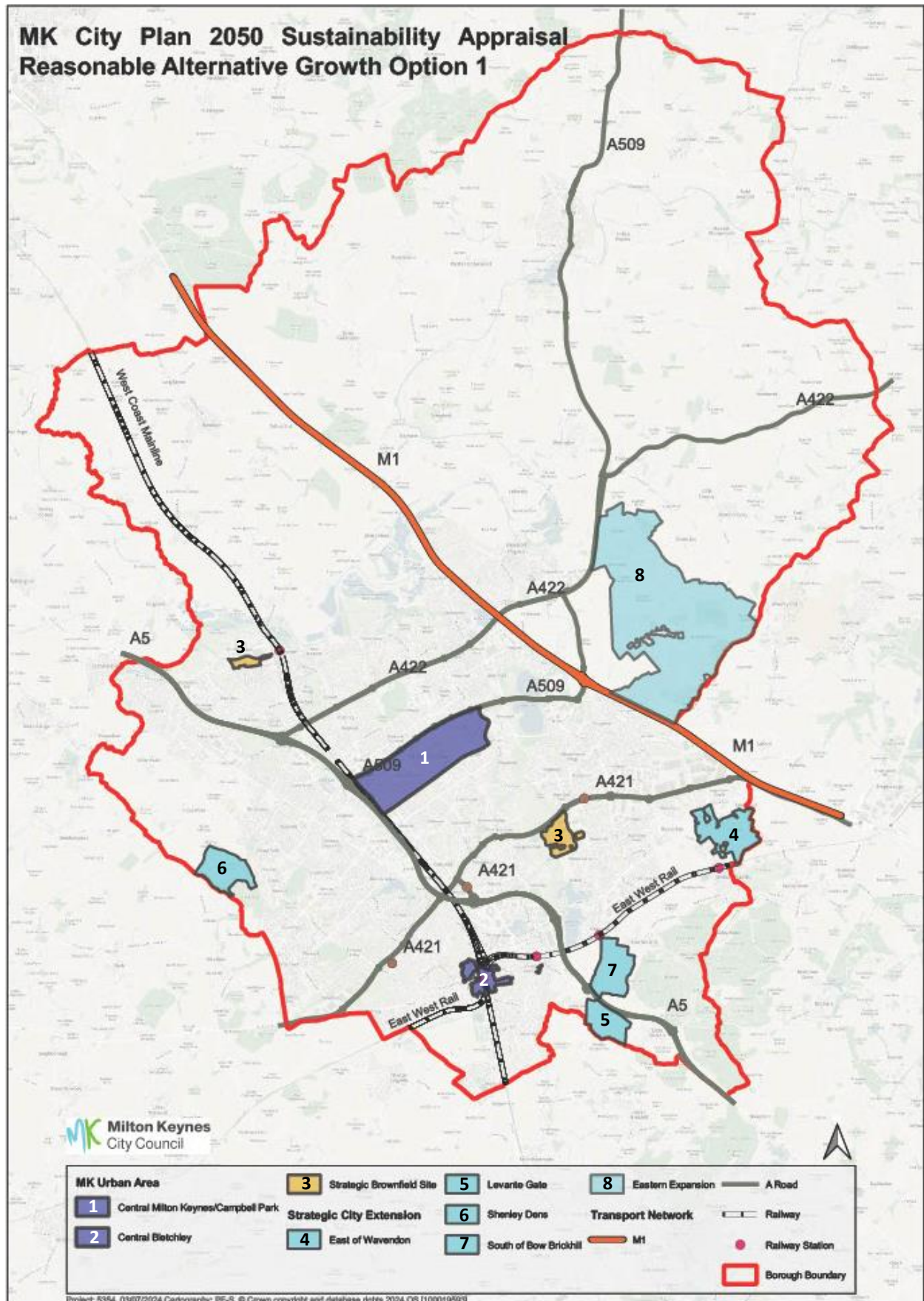


Figure 4.1: Map of Preferred Growth Strategy

4.10 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.

Commercial Development Strategy

4.11 Whilst there is a much smaller range of options available for providing land for employment, retail, and leisure, nonetheless the Preferred Growth Strategy does provide good opportunities for creating high-quality jobs. It would do so through 300,000 square metres of office floor space in CMK (centred around the railway station) with a focus on jobs within technology and innovation in Block B4. It would also provide around 40 hectares of land for offices, research and development and light industry in the Eastern Strategic City Extension. This site sits between the city and Cranfield which both offer existing knowledge and innovation networks to tap into, linked by a proposed Mass Rapid Transit system and good transport infrastructure through the Eastern Strategic City Extension.

4.12 As noted earlier in this report, there aren't any any suitable options for strategic scale warehousing and logistics development to address projected market demand in this sector. This is something to reconsider through a review of the MK City Plan 2050 later. However, the Preferred Growth Strategy still provides opportunity to the create new high-quality jobs with a focus on technology and innovation.

Conclusions and Next Steps

- 5.1** Our reasoning behind the Preferred Growth Strategy contained in the Regulation 18 stage of the MK City Plan 2050 has been set out above. In summary, this has emerged from the Strategy for 2050, a wide and deep range of evidence, stakeholder engagement and the SA process. It is considered the Preferred Growth Strategy best aligns with our plan objectives and SA Framework and would help us achieve our overall vision and ambition for growth.
- 5.2** As a Regulation 18 draft plan, feedback received through consultation will help refine our evidence base and assessment of potential options through the SHLAA and SA. The SA will evolve in an iterative way alongside the MK City Plan 2050 through to the Regulation 19 stage, where further consultation will take place before the plan and SA is submitted for Examination in Public.



Milton Keynes

City Council