

Comments on *Site Allocation Plan – Issues and Options Consultation, September 2014*

The Society welcomes the document and the opportunity to comment on it.

Please note that the Society is concerned about potential development only in the rural area in the south-east corner of Milton Keynes, i.e. in the area in and around Woburn Sands, Bow Brickhill and Wavendon (in addition to the area in and around villages such as Aspley Guise and Aspley Heath in Central Bedfordshire). The Society has no wish to comment on any developments in the rural areas elsewhere, far less on the urban areas of MK.

re Chapter 4 Questions 1: Do you have any views on the scope or content of the Vision and/or Objectives?

The Society believes it should be made clear in the list of Objectives that any consideration of development in Milton Keynes should refer not just to the effects within MK but also to the effects on the resources and/or facilities of adjacent authorities (e.g. the ‘local landscape’ in bullet point 4, ‘sustainable movement’ in bullet point 5 and ‘context of the area’ in bullet point 6). By the same token, presumably Milton Keynes Council would not wish adjacent authorities to allow development that would seriously affect MK resources and/or facilities – unless, of course, some suitably generous compensation scheme could be arranged.

re Chapter 5 Questions 2

The Society has no comment to make on the six questions posed.

However, it is difficult, if not impossible, to ascertain exactly which of the various sites listed in the *Strategic Housing Land Availability Assessment (SHLAA)* document of December 2012 have contributed to Figure 3 ‘The Rural Area Housing Trajectory’ in this chapter. Several of the sites feature in Annex F ‘Profiles of potential Site Allocations’ and so presumably do not contribute to the trajectory in Figure 3. Other sites do not feature in Annex F (or in Annex E, ‘List of sites ruled out after Stage 1 assessment’), so presumably they do contribute to the trajectory: e.g. (i) the application 14/01448/FUL (submitted in July 2014, withdrawn in late September but a revised application is expected) for a change of use and a development of 24 dwellings at the Blind Pond Industrial Estate in Bow Brickhill, and (ii) the final phase of Parklands in Woburn Sands (currently with only outline planning permission, so the number of dwellings included is still to be decided).

re Chapter 7 Questions 3: Do you know of any other sites that don’t already appear in Annex F ‘Profiles of potential Site Allocations’ that we should be considering for allocation through the Site Allocations process?

The Society does not know of any other sites for consideration, other than those in Annex F. However, as stated above, it assumes that development will occur at the Blind Pond Industrial Estate in Bow Brickhill and also in the final phase of Parklands in Woburn Sands.

Questions 4: Do you have any comments to make on the Site Assessment Framework set out in Annex D 'Draft Site Assessment Framework'?

The Society has no comments to make on the Framework that is set out. However, regrettably there is no explanation how the Framework relates to the 'initial sustainability appraisal findings' given in the eleven red/orange/green boxes for each of the sites listed in Annex F 'Profiles of potential Site Allocations'. Presumably these boxes refer to the summary of the eleven 'Sustainability Appraisal Objectives' (SA1-SA11) that is in the Planning and Building section of the Milton Keynes Council website (located within the Site Allocation Plan section of the Planning Policy section). It would have helped greatly if this summary had been included in the Site Allocation Plan document, given that the coloured boxes have been.

Questions 5: Do you have any general comments to make about any of the potential sites identified in the Preferred Sites document?

Sites R17 and R19 both lie wholly within the boundaries of Woburn Sands, site R18 appears to lie within both Woburn Sands and Wavendon, while site R20 lies within Wavendon. Development in any of these four sites would rely heavily on the infrastructure of Woburn Sands and its various services, which are already under very heavy pressure – see Questions 7 below. Moreover, any development of these sites would be contrary to Policy WS6 of the Neighbourhood Plan for Woburn Sands (approved by Milton Keynes Council in July 2014). Policy WS6 states: **'The housing developments in Parklands and on the Green's site are expected to meet the needs for large scale housing development in Woburn Sands during the plan period. Additional housing in the plan area will therefore be limited to small scale infilling between existing properties or redevelopment of existing properties**'. So none of these four sites should be included in the list of potential sites any further.

Sites U25 and U26 both lie on Lower End Road and so are within the parish of Wavendon. However, they are far from its settlement boundary and also from its few services. Any development in these two sites would most probably have to rely heavily on the services of Woburn Sands which, as stated above, are already under very heavy pressure. Neither of these two sites should be included in the list of potential sites any further.

Questions 6: Do you have any comments to make on the relationship between Neighbourhood Plans and the Site Allocations Plan process?

Neighbourhood Plans should firmly guide the Site Allocation Plan process – see Questions 5 above. Approved Neighbourhood Plans (such as the Neighbourhood Plan for Woburn Sands) have been assessed by independent Inspectors who have been appointed by the Government to ensure that the Plans conform to current national planning legislation (e.g. the NPPF) and to local planning documents (e.g. Milton Keynes Core Strategy). They have also been approved democratically by the local community and by Milton Keynes Council.

re Chapter 8 *Questions 7: Do you agree that the focus of new allocations should mainly be on Newport Pagnell, Olney and to a lesser extent Sherington, given the level of recent development and ongoing development, in Woburn Sands?*

The Society agrees wholeheartedly with the suggestion in the Site Allocations document that Woburn Sands has already contributed (more than) its 'fair share' of the new dwellings for

the rural areas of Milton Keynes for the period up to 2026. Therefore the shortfall of dwellings in the rural areas should be sought elsewhere, most obviously principally in Newport Pagnell and Olney, and also in Sherington.

Questions 7: Alternatively, should further growth be considered in Woburn Sands? If so, what is the justification for this?

There is no justification for any further growth in Woburn Sands (other than any small scale infilling between existing properties or redevelopment of existing properties, as stated in Policy WS6 of the Neighbourhood Plan for Woburn Sands).

Questions 7: Are there any pressures on services in the rural settlements that you feel should be taken into account in making new allocations. If so, what are they?

By definition, rural settlements are more isolated than urban ones. A good road network and decent (regular, affordable) public transport are particularly important therefore. Access to decent educational, health, shopping and recreational services are very important too. Ideally these facilities should be based within the settlement or, if not, accessible via public transport. More generally, for both rural and urban settlements, perhaps access to recreational/sports facilities should have a higher priority than it may have had in the past, not only because of its role in the mental and physical health of the residents of MK but also because of Milton Keynes stated objective of becoming an ‘International Sporting City’ (see Chapter 4).

Questions 7: Are there any opportunities for new development to support the continued viability of local services which you would like to be taken into account?

No. Local services in Woburn Sands are stretched and they will certainly be at capacity when the developments at Parklands and at the Green’s site are complete. Any more development (such as at sites R17, R18, R19 and R20 and at sites U25 and U26) would have only a negative effect on the availability and quality of these services.

re Chapter 11 The potential sites

re Paragraph 11.2; see the comments in Questions 4 above on the initial Sustainability Appraisal conclusions.

re Paragraph 11.3; surely the sites **are** scored in some way since they have all been given a colour coding for (presumably) each of their eleven Sustainability Appraisal conclusions?

The Society believes that for sites R17, R18, R19 and R20, and also U25 and U26, the two summaries given and the associated current colour codings for the Sustainability Appraisal conclusions have overlooked three facts or factors that have become prominent recently:

- The Neighbourhood Plan for Woburn Sands was formally approved in July 2014. Policies WS6 and WS5 are particularly relevant to the site allocation process.
- From March 2019, there will be a doubling in the frequency of the trains on the East-West Rail between Bedford, Bletchley and thence Oxford. This will mean that the level crossing gates in Woburn Sands, across the A5130 Newport Road, will be shut for twice as long as currently is the situation. This will seriously affect the flow of traffic along the A5130 and also the operation of the T- junction between Newport Road and Cranfield Road that is immediately to the north of the level crossing.

- The SLA will be developed along the A421 over the next fifteen or so years. The effect of the extra 3000 or so dwellings there will be profound, in particular the effect on the volume of traffic and its speed of flow in the surrounding neighbourhood. Any other development in the south-east corner of Milton Keynes can only make the situation more difficult.

Yours sincerely,

A handwritten signature in black ink that reads "Alastair Ewing". The signature is written in a cursive style with a large initial 'A'.

3rd November 2014

Alastair Ewing, WSDS Committee member

<http://www.woburnsandsanddistrictsociety.org/default.asp>