20th May 2012

Dear Mr Banks

Re: Matters and Issues Identified in respect of MK Core Strategy as set out in ID/2A

Attached are our written statements (electronic versions provided) on some of the Matters and Issues identified in document ID2A, which for ease we have used a new page for each matter. Our written position statements expand on representations already made during the whole process, following the matters raised by the Inspector. We, will be attending the examination but will not be making verbal submission.

For information the Society is a registered charity, non-political, and non-profit making, funded by the subscriptions of its membership. The Society was formed in the 1960’s to preserve and protect the amenities and rural character of the villages and hamlets in the area the Society covers. These include, Woburn Sands, Aspley Guise, Aspley Heath, the Brickhills, Husborne Crawley, Salford and Wavendon.

We hope the Inspector finds our comments useful.

Yours sincerely

F M Fry
Vice Chair
Woburn Sands and District Society
http://www.woburnsandsanddistrictsociety.org/default.asp
Matter 1 – Overview (processes and justification, legal compliance, national policy, sub-regional and wider context) (Core Strategies vision, objectives and policies as a whole).

The Society’s position statements in respect of the issues raised under this matter:

1. Up until 2010, we do not consider that the processes of assessment, evaluation of alternatives and sustainability appraisal in respect of the directions of growth for MK were sound. To put this in context the directions for growth, prior to any assessment or consultation, was decided when Milton Keynes Partnership (MKP) the Government’s Urban Development Agency with Planning Control was set up under Statutory Order laid before Parliament in March 2004 when the examination of the draft MK and South Midland Sub Regional had only just started. MKP planning control areas were broadly set to cover the expansion areas under the adopted Local Plan to the east and west, and additionally the SE encompassing Wavendon and Woburn Sands. This ignored the Local Plan Inspector (2004) advising that MKC should be looking east of the M1 and to sites north of the M1 but close to J14 for future housing and employment areas. As far as public consultation on the Urban Development Agency’s planning control area, hardly anyone in Milton Keynes knew of the proposal – it was bounced through between January and March 2004.

The MK and South Midland Sub Regional Strategy 2005 did not set out the directions of growth. It stated that areas of search for urban extensions should be to the E, SE, S and West.

As for MK2031, we cannot state too strongly how deeply flawed and unsound the processes, assessment and technical evidence that underpinned this non statutory document were. There was very little evidence or technical assessment in place before the 6 options for directions for growth were publicised in November 2005 – as simply 6 diagrams with little supporting data, and even those few people who attended the exhibitions, (all but one held before the 6 options were publicised) could find no evidence and technical data to inform their choice. When the Evaluation Report was published in April 2006 along with the draft MK2031, it was characterised by its iterative refrain in respect of the lack of technical data, and there was an iterative comment concerning the lack of information to inform this report, and thus the report should be regarded as uncertain and tentative. The Evaluation Report and Appendices were released on April 19th minus part of Appendix 3 (public and stakeholder responses to the stage 2 consultation) and appendix 7 the Urban Potential Study. These were released on to the MK web on June 9th, just 3 days prior to a meeting to agree MK2031. MKP commissioned a Peer Group Report in April, published in June, which was ignored, as were the views of the business community MK Forum and other bodies including local communities. The July 2006 Sustainability Assessment was unavailable at the time.
MK2031 was approved and submitted to inform the SE Plan in June 2006. The whole process was a complete farce, and totally unsound.

The processes that underpinned the SE Plan followed the laid down process, however, as the Inspector will be aware the consideration of submitted arguments for whether MK should expand to the SE or E of the M1 were broadly balanced and it was down to preference. Indeed in the Secretary of State’s schedule of changes, when she finally recognised that it was unsound for the SE Plan to incorporate part of the EE Region, she proposed that the 5,600 homes put forward for CBC should be allocated to the East. However, this was met, as recorded, by strong resistance from Milton Keynes Partnership and MKC who had their own reasons, which we will expand on in another matter, for opposing expansion to the East. It is of note that the EE Plan does not have any mention of MK expansion into CBC. The final SE Plan required MKC to test expansion to the East of the M1 during the life of the Core Strategy.

It should also be noted that the adopted CBC (North) Core Strategy and outdated MK/CBC Memorandum of Understanding, whilst referring to expansion of MK into CBC makes clear that this is dependent on a review of the EE Plan, which was never examined and completed owing to a change of Government Policy. Central Bedfordshire Council is currently preparing a CBC wide Core Strategy following the withdrawal of Luton from the Joint Luton CBC (South) Core Strategy. The draft CBC Core Strategy will be published on June 11th and therefore no weight should be given to any MKC argument to the examination, that there is agreement by CBC for MK to expand into its area based on outdated and soon to be superseded documents.

The reason we have expanded on these historical references, is that whilst we would broadly support a SE expansion into the strategic reserve areas, we are implacably opposed to any further expansion to the SE, without a robust, evidence based, technical assessment and sustainability assessment of future directions of growth, with full consultation with neighbouring authorities, in contrast to the procedures we have witnessed from January 2004 to the present day.

2. In respect of the SE Plan and NPPF: We are of the view that the submitted Core Strategy is broadly compliant with the SE Plan, the only changes that have been made, are a reduction in housing totals and the removal of the SWDA, which is wholly within another authority, and will be for Aylesbury Vale to decide. We consider that the changes made whilst still aspirational are deliverable both in the current economic climate and, in a hoped for, improved economic climate during the life of the plan as justified by the Housing Technical Paper. The Strategic Market Assessment total/annual target, we regard as totally unachievable, as is the SE Plan total/annual target.

We are also of the view that the Core Strategy is consistent with the NPPF

- **Positively prepared** - the Core Strategy has been prepared based on objectively assessed development and infrastructure requirements adapted to realistically deliverable targets. There are no requirements from neighbouring authorities, their own plans meet their development and infrastructure requirements and there is no known unmet need.

- **Justified** – the Core Strategy has considered alternative sites to deliver the unmet additional target of 2,500 dwellings, it has also considered whether the SE Plan
housing targets are realistically achievable, given the outstanding permissions and foreseeable slow improvement of the economic environment

- **Effective** – the Core Strategy is deliverable over the period and does not require cross boundary joint working (with the exception of opposed Junction 13A which has neither Highway Agency or neighbouring authority support). Nor do neighbouring authorities have requirements beyond what is provided in the plan (excluding Junction 13a as stated before)

- **Consistent with national policy** - the Core Strategy is broadly consistent with both the NPPF and SE Plan, and is realistically deliverable of sustainable development, taking into account Social, Economic and Environmental dimensions. More importantly it is a plan that meets the MK local community needs and aspirations and is realistically achievable.

Finally we would reiterate our view, that before any increase in development is considered in any direction in Milton Keynes, that a robust, evidence based assessment is carried out in respect sustainable directions of growth both during the life time of the plan, and in the future.

F M Fry  
Vice Chair  
Woburn Sands and District Society
Woburn Sands and District Society

Matter 2 – Development Strategy, Settlement Hierarchy (Policies CS1 and 9
area based policies generally Table 5.7)

The Society’s position statements in respect of the issues raised under this matter:

1. We would support the broad scale and directions as set out in Policy CS1 with the
proviso that this comment is limited in respect of the SE to the areas shown in the CS,
namely the strategic reserve areas, which were identified as having the potential for
development in the 2005 Local Plan, for the period after 2011 and a review of the
Plan. The development planned, as set out in the CS is adjacent to the urban area, and
therefore sustainable in terms of being supported by existing and enhanced
infrastructure. This should be qualified by the fact that we are strongly of the view
that there should be robust green infrastructure protection (this should not be
interpreted to be a strip of playing fields or the like) to ensure maintenance of rural
community identity, prevent coalescence, between rural communities, between key
settlements and rural communities, and between rural communities and the urban
area.

2. However we would not support further development to the SE into the rural area
around Wavendon and Woburn Sands as a) that would risk coalescence and loss of
identity of these historic rural communities, b) cause grid lock on Newport Road and
Woburn Sands High Street, due to the constraint of Woburn Sands level crossing
particularly with increased passenger and freight transportation arising from the EW
rail link and c) cause harm to Woburn Sands business community including retail and
undermining its role as a key rural settlement, as has already been evidenced by the
oversupply of dwellings at the Nampak development, which by the time it is complete
will increase the size of Woburn Sands by 54% with consequent negative impact on
infrastructure. It should be noted that education and health facilities for WS residents
are provided by CBC and are at full or over capacity, and where education is
concerned there is a three tier system, unlike MK’s two tier system. CBC’s third tier
is in Leighton Buzzard, where increased development is planned.

We fully support the views of Wavendon PC, Bow Brickhill PC, and Woburn Sands
in respect of Lower End Road and where Bow Brickhill is concerned the Bletchley
Bedford rail line provides a defensible line to the MK urban area. This will ensure that
the rural and historic identities of these communities are not lost within the urban
sprawl of Milton Keynes as has happened in so many MK communities.

3. We are fully aware, as has been stated, that some MK Councillors and MK Planners
want to protect their substantial rural area east of the M1 and aspire to develop SE
across the M1 to encompass Cranfield and Cranfield University currently in Central
Bedfordshire, ignoring the negative impact on Woburn Sands and Wavendon.
However in our view Woburn Sands and Wavendon have already made substantial
contributions to the rural housing requirement and will be in considerable difficulty as
stated before if further development is proposed. No further development should be permitted until the full effects of both Nampak and the Wavendon development are fully assessed and again, as stated, before a robust and evidence based assessment of sustainable directions of growth is carried out.

F M Fry
Vice Chair
Woburn Sands and District Society
The Society’s position statements in respect of the issues raised under this matter:

1. The Society is of the view that MK will struggle to reduce commuting by car over the plan period, due to Milton Keynes’s design and history and therefore would consider the Policy to be sufficiently ambitious. Without unaffordable subsidy of bus travel, or unachievable levels of investment in design and alternative transport development, the car or other individual transport mode will be the mode of transport for most MK residents, and inward commuting employees for the foreseeable future – that was how MK was designed (local employment areas, and local services), and short of knocking it down and starting again, car or individual transport will be in the majority. However that should be qualified by the fact that the very design of MK lends itself to innovative public transport system design solutions, as the economic situation improves.

2. We consider it imperative that the grid road system is maintained and expanded into new development at the urban fringe. Irrespective of the original and still supported reasons for a grid road system in terms of separating people/homes from traffic pollution and accident risk, ease of movement across MK and carbon offsetting through trees and planting, there is a more important one. That reason is of future proofing the transport network land for future mass or other public transport solutions. Developments in both individual and mass transport are rapidly changing – electric cars, driverless cars, mono rails, guided buses, hop on hop off running chains etc. A city street by its design cannot be adapted for the infrastructure required for tomorrow’s technology – the grid roads can. You can through planning design exclude or frustrate car use but that also designs out the alternative mass transport modes and therefore does not plan for the longer term future in a sustainable manner.

3. Whilst it may be appropriate for land to be set aside for another Park and Ride off the A421, within MK, we are not of the view, based on the usage of the existing Park and Ride off J14, that this is economically viable for the foreseeable future due to the spread out nature of employment and destinations within the city. Why would people driving to MK, leave their cars and use public transport which may not go where they want to go, when they can drive directly to their destination and park there in a much shorter time, unlike more traditionally laid out towns like Oxford, where it is considerably easier to use Park and Ride, than to try to drive. J14’s main use occurs during peak retail events like, Christmas and the weeks leading up to Christmas, when accessing the Centre MK by any other means becomes difficult. However future proofing land for this function is appropriate for the time when mass public transport that is destination flexible becomes technically possible.

4. We are of the view, in respect of EW rail link, that the MK to Oxford link west of MK is deliverable and proceeding and therefore should be given due weight when planning development to the west of the city.
However we are not of the view that what is called the Central Section from MK/Bletchley to Cambridge should be given much if any weight. The Bletchley to Bedford link (Marston Vale line) capacity is constrained and the section between Bedford to Cambridge is currently undeliverable as the route is obstructed by development and a lake. The original option report 2009 set out 5 route options, 3 from Bletchley to Luton via Stewartby, and two to Bedford. All would have had a reduction of the hourly stopping service from WS to Bedford to one every two hours to allow a one hourly non stopping service from Bletchley stopping at Woburn Sands, before terminating at Bedford. Whilst there has now been assurance that there will not be a reduction in the stopping service, and the current proposed route is still to Bedford from our knowledge of the capacity of the line, and increased freight use plus, plus the problems with the further central link beyond Bedford to Cambridge, the Bletchley to Bedford part of the EW rail link is currently undeliverable, and therefore should be given limited weight. It should also be born in mind that a decision may be taken to make the central link from MK to Cambridge through Luton rather than Bedford. Therefore in respect of the weight that should be given to linking MK to Cambridge little to no weight should be given until the proposal is more certain than a concept. Certainly development further into the SE could not be argued to support the EW rail link until the route and services proposed, particularly the stopping service are more certain.

5. The Society is totally opposed to a Junction 13A. We have been aware that MKC has held the view for 10 and more years that there should be a J13a. Not because of any pressing need for an additional junction in terms of transport infrastructure, but because of its often stated view that Cranfield, with its internationally renowned postgraduate University and Technology park would be more suited to being part of the new town of MK than the predominantly rural area of Central Bedfordshire, – a view not supported by Central Bedfordshire or indeed Cranfield. Compounded by a determination to protect its substantial rural area to the East of the M1 (over 50% of the Authority area). It should be noted that MK has a low skills base and previous attempts at developing higher skills education apart from the excellent vocational provided by the existing educational establishment have failed. That said we fully support MKs current initiative, to try again to set up a university in MK in partnership with outside institutions, and sincerely hope it succeeds. However this covetous aspiration in respect of Cranfield, underpins the whole ethos of development to the SE into what is a very limited land area rather than expanding to the east, or indeed, to support the EW rail link, to the west, subject to agreement with Aylesbury Vale.

The M1 at this point forms the boundary between MK unitary authority and Central Bedfordshire Council authority area. There is no agreement with CBC or indeed with the Highways Agency in respect of an additional junction into what is the CBC small rural parish of Salford and Hulcot. Indeed it has consistently been opposed by both the Highways Agency and CBC. It should be noted that Junction 13 and the A421 west of J13 has recently been upgraded, to meet the demands of both North South and East West traffic in respect of planned and existing developments in both MK and CBC.

Whilst under the Localism Bill and the NPPF there is a duty of co-operation between authorities in respect of cross boundary issues, which we fully support, this should not be interpreted as a duty of compliance to the demands of one authority on another, as
indeed we have had confirmed by the Department of Communities and Local Government.

F M Fry
Vice Chair
Woburn Sands and District Society
Matter 3 – Overall Housing Provision (Policies Cs2 and 10, Table 5.2, Chapters 17 and 18, Appendix D)

The Society’s position statements in respect of the issues raised under this matter:

1. We are of the view that the housing provision set out in the Core Strategy is realistically and deliverably set to encompass both its indigenous needs and the needs arising from economic expansion and inward migration. We are a little weary of unachievable, unrealistic numbers, being considered that result in more developer pressure for greenfield space, but with no increase in housing resulting. It is not lack of suitable land that has caused a slowdown in the housing market, it lack of mortgage finance, the state of the national economy and a fall in house prices reducing profitability. In particular:
   - The SHMA was conducted in 2008 at the height of the banking collapse, but at a time when economic recovery was thought to be possible in short time – before the subsequent economic problems. Even then it showed MK house prices falling, decrease in inward migration and an increase in outward migration over a period before and during the banking problems. The SHMA put the housing annual requirement higher than even the examined RSS figure of 2,068 at 3,366 (never achieved even during the booming years, and which in the foreseeable future is totally unrealistic, even taking into account a gradual return to growth.
   - It is sensible to review the SHMA in the light of the current and the foreseeable future particularly taking into account the significant amount of land available, and permissions already in place to rapidly take advantage of an improved economic environment.
   - To meet MKC indigenous needs requires an annual figure of 1,300 dwellings achievable based on current completion rate – the Government projections are a requirement of 1,600 dwellings per annum which is achievable over the plan period. The Core Strategy proposes 1,750 dwellings per annum which could realistically be achieved over the plan period.
   - The bottom line is that sufficient land is allocated, with permissions full or outline to provide a supply for the next 14-15 year, with no additional sites needed, and without taking into account windfall sites. To have an unrealistic and unachievable housing target over the plan period will only lead to an increase in developer land banking and inappropriate sprawling countryside development proposals based on a failure to meet the unachievable targets set.

2. We are of the view that the only figures that are relevant in respect of the SE Plan published in 2009 are 34,160 dwellings in MK urban area inclusive of the sites allocated under the 2005 Local Plan, and 4,800 dwellings (inclusive of the SRA- see 2.34 of SHMA) as SE urban extension and 2,400 dwellings in the rural area. A total of dwellings from 2006 – to 2026 of 41,360, an annualised figure of 2,068. This is a figure that we believe, even in an improved economic and housing market, would not have been achieved. The core strategy 2011 – 2031 has revised this figure to a more realistically and deliverable total of 28,000 annualised to 1,750 dwellings following
the change in economic and financial climate. 24,000 in the urban area + the 2,500 in
the strategic reserve areas, and 1,200 in rural area.

We take the view that it is perfectly acceptable for the Core Strategy, whilst being
generally in conformity with the SE Plan to revise its housing targets to more
deliverable totals, albeit still high after having been advised the RSS will be
abolished in the near future. More importantly these targets are still high enough
support the economic growth of MK.

Basically for housing figures to have any credibility and meaning, they must be
realistically deliverable over the life time of the plan. Aspirations must not allow
stretching beyond realistic. Otherwise we get mickey mouse figures with no meaning
other than providing a lever for developer land acquisition, without increasing
housing delivery at all – as delivery is not based on land availability in MK (of which
there is more than enough identified) but other factors outside the control of MK –
mortgage finance, the national economy, and house prices.

3. We are extremely concerned about the number of the affordable homes brought in on
the back of development as part of MK policy. Affordable homes are in our view the
main housing need locally and nationally, and we support, a tariff/levy to meet
increased infrastructure requirements. Our concern is not in respect of the CS policy,
which we consider to be viable, but the perverse incentive that can arise under current
national policy, as we have seen at Nampak, for developers to maximise their profits
by claiming viability issues to a) change the agreed mix of housing to a more
profitable mix, that does not meet sustainability requirements b) reduce the number of
affordable housing units, or just not build them and c) reduce infrastructure payments.
We feel that in this respect national policy has moved too far towards the developer.
We have little doubt that viability claims will be an increasing trend, not because of
real viability issues, but because viability is a get out clause that can increase profit.

We are of the view, the only solution in terms of affordable homes is for centrally
allocated funding, bearing in mind the proceeds of council sales went to the Treasury
until 2008, and that the Government has now reduced the price at which tenants may
purchase their affordable homes under right to buy.

F M Fry
Vice Chair
Woburn Sands and District Society
Matter 6 – The Strategic Land Allocation (Policy CS5, Proposed post-submission changes September 2011)

The Society’s position statements in respect of the issues raised under this matter:

1. We consider that allocating the strategic reserve areas, identified as having the potential for development post 2011, would constitute sustainable development on the urban fringe. We think this is particularly true of Glebe Farm and Eagle Farm if the centre section of the Golf club and 9 hole golf course is added to make it one site. It is adjacent to the urban area with employment sites and necessary infrastructure, and main transport routes as well as retail facilities. Enhancement of existing infrastructure is a more cost effective route than provision of new infrastructure although a new secondary school will be part of the development. We are of the view that, subject to there being no further development SE, Lower End Road and the A5030 provide a clear and defensible boundary’s between the urban development area and the rural communities of Wavendon and Woburn Sands. We have some concerns in respect of Church Farm and the lack of a defensible barrier to further urban sprawl in that vicinity, but in terms of sustainability it has the same advantages. We note there are other sites put forward that also scored reasonably well – however we are also aware that the SRAs are likely to provide early delivery.

2. We would not be supportive of further development in the SE beyond Lower End Road, nor beyond the A5030 due to a) the risk of coalescence with the rural communities of Wavendon and Woburn Sands, and b) lack of sustainability in terms of infrastructure, particularly health, transport, and education. As is clearly demonstrated by the alternative site comparison, there are other high scoring sites, particularly east of the M1 that can provide additional development if required on review of the Core Strategy.

The SE Plan has already stated that testing should be carried out in respect of expansion E of the M1, as indeed was supported by many in the business and other communities at the Examination and changes to the SE Plan. We are of the view that at the review of the Core Strategy a robust assessment of directions for future growth should be carried out, such as was not carried out under MK2031, or later. As is clear from both the Examination and SE Plan the sustainability of expansion E or SE is broadly balanced, save for MKC and MKP being determined to protect their own substantial rural area, and latent aspirations in respect of Cranfield.

We consider that with 28,000 outstanding permissions and sites, including the SRAs, allocated, whilst stretching are deliverable over the life of the Core Strategy, and
changes in demand can be flexibly met within MK boundaries as part of the regular review process.

3. We are very well aware that developers and land owners are lobbying hard in respect of every green field site around Milton Keynes. However we are strongly of the view that as Milton Keynes Council has for the first time ever control over the city’s future, it has a responsibility to develop Milton Keynes into the vibrant regional centre it should be, but without destroying its iconic heart, and its historical roots that make it so attractive for residents and business alike. Crammed, and sprawling characterless urban development as such as has characterised the last 10 years will if continued do just that.

F M Fry
Vice Chair
Woburn Sands and District Society
Matter 4 – Economy and Town Centres (Policies CS3-4, CS7, CS16-17, Tables 5.3 – 5.7)

The Society’s position statements in respect of the issues raised under this matter:

1. We consider that it is important that there is an appropriate jobs per dwelling ratio in MK. MK is supposed to be an economic hub for the sub region – under any of the plans, local or regional. With the outward progression of the London commuter belt and consequent rising prices in Buckinghamshire and Hertfordshire, both Milton Keynes and Central Bedfordshire are becoming the focus of that progression. Whilst some allowance should be made to inward commuter migration, the biggest priority should be for local requirements, in order for growth to be sustainable in terms of jobs and infrastructure, and to avoid MK becoming just another commuter town. This is why WSDS is totally opposed to any reduction in the already substantially reduced employment area of the Nampak development. It should be born in mind that the only reason that, what was an employment site was, came forward as a mixed employment/residential site, was that employment land would be retained, as part of the design brief.

2. We consider it is important that MK raises its skills level and promotes a knowledge based employment. We consider it is critically important for both MK and CBC to put less if any emphasis on logistics and warehousing employment for the following reasons.
   • MK is in the SE, and is a relatively expensive place to live
   • Whilst there is always demand around a major trunk route for logistics and warehousing employment they are poor economic value for money in respect of land use. They are large footprint facilities, providing limited, low paid, low skilled employment. As such and as has been evidenced by Pro Logis in Bedfordshire, a substantial number of employees are bussed in from areas outside of Bedfordshire – Leicestershire, Peterborough etc. Therefore there is limited economic benefit to either MK or local residents – and a considerable adverse impact both in terms of increased HGV transport locally, and the attractiveness of the environment for non-logistic knowledge based business.
   • MK already has a large number of these facilities, and whilst there will always be market demand; the situation is becoming unsustainable in terms of transport infrastructure, and air quality. It is of note that the air quality at the M1 junctions is not good and deteriorating.

3. In respect of Town Centres – we fully support the importance of Town Centres as vibrant centres for the community/town; however that has to be qualified by what we consider to inadequate consideration of the adverse, as apart from beneficial impact of development. This is particularly the case in respect of the rural key centres, and where our particular interest lies Woburn Sands. Nampak, a previous employment site was allocated for mixed employment and residential impact. It should be noted that
this is just south of a railway crossing which acts as a significant constraint and can not be widened.

**As background** at that time there were 900 dwellings in WS. The agreed Design Brief was for 399 mixed type dwellings at a density of 40dph, and just under 7ha of employment land which was considered to be sustainable. This increased the size of WS, as a rural town, by 44%. The development was to be delivered over up to 6 phases. Phase 1 and 2 delivered 280 dwellings at a density of 45dph. Following appeal Phase 3 was permitted to a) deliver a further 112 dwellings and a reduction of the employment land to 1.6 ha, thereby delivering a total of 392 dwellings. We are awaiting Phases 4, and 5 and are advised that the developer wants to remove any employment land, and that these phases, irrespective of the employment land issue are likely to increase the dwellings on the site to over 650 dwellings. If the employment land is removed, bearing in mind that the presence of employment on the site was the fundamental reason why the site came forward, the logic of the development will have been completely perverted. This has put severe pressure on the infrastructure, education, health (CBC provided) etc, but more particularly transport, The high street and surrounding communities will be severely affected a) due to the constraint of the level crossing, b) the increase in through traffic access to the M1, A6 and A5 c) increase in retail traffic and d) lack of parking.

This background is the main reason why we are opposed to any increase in development beyond the Lower End Road. Development beyond what was agreed at Nampak has and will mean that WS increases in size by over 54%, and will have contributed at least 500 dwellings to the 1,200 rural totals for 2011 to 2031. The development of the SRA will slightly increase the pressure on WS, but less, due to its proximity to the A421 and the urban area and with the delivery of a secondary school which may decrease the pressure on education.

Woburn Sands needs time following the full delivery of the Nampak development to assess the impact of such a substantial development, before any additional development is even considered. We are of the view that the limits of what is sustainable in WS will have been reached, and no further development should be considered further SE than Lower End Road until there has been a robust assessment of sustainable future directions of growth of MK, such as was not carried out under MK2031 nor the SE Plan. There is a serious risk that what is a rural key settlement will lose its economic viability due to congestion, let alone lack of supporting infrastructure.

F M Fry  
Vice Chair  
Woburn Sands and District Society.