



# PLAN:MK Examination

## STATEMENT FOR MATTER 1: LEGAL REQUIREMENTS AND DUTY TO CO-OPERATE

Iceni Projects Limited on behalf of  
Redrow Homes (South Midlands)  
and Merton College Oxford and  
Wavendon Residential Properties  
LLP (Landowners)

20<sup>th</sup> June 2018

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ICENI PROJECTS LIMITED  
ON BEHALF OF REDROW  
HOMES (SOUTH MIDLANDS)  
AND MERTON COLLEGE  
OXFORD AND WAVENDON  
RESIDENTIAL PROPERTIES

**PLAN:MK Examination**  
STATEMENT FOR MATTER 1:



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A1. SUSTAINABILITY APPRAISAL REVIEW (ICENI PROJECTS)

## 1. QUESTIONS

### Question 1.4

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*Has the Sustainability Appraisal adequately assessed the likely environmental, social and economic effects of Plan:MK? Does the appraisal demonstrate that the Plan has been tested against all reasonable alternatives? In particular:*

*i) Has the inter-relationship of effects, including cumulative impacts, been addressed?*

*ii) Is there adequate coverage of all reasonable alternatives (sites and policies)?*

*iii) Are reasons for rejecting alternatives and discounting unreasonable options clearly given?*

*iv) Is the SA proportionate and relevant in contributing to the evidence base of Plan:MK (NPPF paragraph 167)?*

1.1 The Sustainability Appraisal (SA) has not adequately covered all reasonable alternatives (sites and policies). The Sustainability Appraisal Review document produced by Icení Projects (Appendix A1) provides a critique of the approach of the Sustainability Appraisal and the evidence supporting it.

1.2 The reasonable alternatives identified by the Sustainability Appraisal (MKSUB005) relate to duration of the plan period as well as strategic site options. Whilst these reasonable alternatives are considered within the context of the SA this is not considered to be adequate coverage.

#### **Plan Period**

1.3 As set out in our original representations to the Proposed Submission consultation (December 2017) and the accompanying letter from Dentons (20<sup>th</sup> December 2017) we identified that the Sustainability Appraisal is not legally compliant as it fails to consider, inter-alia, a different period for the Local Plan.

1.4 The identification of 'reasonable alternatives' is guided by the Environmental Assessment of Plans and Programmes Regulations 2004, Regulation 12 (2)(b) of which requires the Sustainability Appraisal to evaluate reasonable alternatives taking account of the Local Plan objectives.

1.5 Our original representations considered that the Plan should cover a period at least to 2034 but preferably longer. We note that the current draft of the Plan identifies a 15 year plan period, from 2016 to 2031. We consider this approach to be unsound, given the Plan will not be adopted until the end of 2018 at the earliest, thereby essentially reducing the plan period to 12 years.

- 1.6 It appears this identified plan period has been carried forward from the aspiration set out in Core Strategy (Policy CSAD1) which, required an early review of the plan, to 2031 or such longer period as the Council chooses. However, this was on the assumption that an adopted plan would in place by 2015. Clearly, this initial view on a suitable plan period should be revisited given the now emerging Local Plan will be adopted no sooner than three years from the previous assumed adoption date of 2015.
- 1.7 The Local Plan presents a series of 17 Strategic Objectives (MKSUB001 page 8). Two key objectives are no.1 and no.3 which require the plan to reflect on the recommendations of the MK Futures 2050 Commission Report and the National Infrastructure Commission Interim Report (November 2016) to support development along, and making Milton Keynes the centre of, the Cambridge-Milton Keynes-Oxford Arc (caMKox Arc).
- 1.8 In light of this, and the relatively short duration of the plan period, it would be reasonable to consider the sustainability merits of a longer plan period which might better help plan for the longer-term growth envisaged by the MK Futures 2050 Report (MKMIS001) and the National Infrastructure Commission report (MKINF004).
- 1.9 In response to a question from the Inspector, the Council in its letter dated 3<sup>rd</sup> June 2018 (INS1a)(page 9) identifies that: *“alternative plan periods were not examined as part of the SA process. Reasonable alternatives must be defined taking into account the objectives of the plan, and so objective 2 of the plan (which references the plan period) leads to a conclusion that there was no (reasonable) need to appraise (and in turn consult-upon) alternative plan periods.”*
- 1.10 It can therefore be considered that Strategic Objectives no.1 and no.3 are at odds with Strategic Objective no.2 of the Local Plan in so far as they relate to informing the identification of a (reasonable) alternative plan period.
- 1.11 Notwithstanding the Council’s view that Strategic Objective no.2 does not require an alternative plan period to be considered, the application of Regulation 12(2)(b) of the Environmental Assessment of Plans and Programmes Regulations i.e. *“the report shall identify, describe and evaluate... reasonable alternatives taking into account the objectives... of the plan”* would dictate that Strategic Objectives no.1 and no.3 require consideration of an alternative (longer) plan period even if Strategic Objective no.2 (in the Council’s view) does not.
- 1.12 There are therefore evidently flaws with the SA in relation to the lack of consideration of an alternative plan period.

**Growth Strategy**

- 1.13 Our original representations to the Proposed Submission Local Plan (December 2017) and supporting letter from Dentons (20<sup>th</sup> December 2017) also considered that the SA was flawed given it did not consider reasonable alternatives for an infrastructure/capacity led spatial strategy with allocations and policies being influenced by the Government priority for development along the CaMKox Arc.
  
- 1.14 Again, with reference to Local Plan Strategic Objectives no.1 and no.3 it is essential that the Local Plan supports growth along the caMKox Arc.
  
- 1.15 Given this lack of consideration of reasonable alternatives in the Sustainability Appraisal it is considered that the Local Plan is unsound by virtue of it not being legally compliant.
  
- 1.16 In order to make the Local Plan sound it is considered that an alternative plan period (up to 2034) is considered in the Sustainability Appraisal along with a spatial growth strategy that takes account of the Government priority for development along the CamMKox Arc.

## **A1. SUSTAINABILITY APPRAISAL REVIEW (ICENI PROJECTS)**



# Plan:MK Sustainability Appraisal Review

## Detailed Review of SA Report

Iceni Projects Limited on behalf of  
Redrow Homes (South Midlands)  
and Merton College Oxford and  
Wavendon Residential Properties  
LLP (Landowners)

June 2018

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ICENI PROJECTS LIMITED  
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RESIDENTIAL PROPERTIES

Appraisal

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DETAILED REVIEW OF SA REPORT





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# 1. INTRODUCTION

1.1 This Sustainability Appraisal Review has been produced on behalf of Redrow Homes and seeks to provide a critical analysis of the Sustainability Appraisal (SA) produced in support of the Milton Keynes Local Plan (“Plan:MK”).

1.2 The relevant Sustainability Appraisal Documents of interest in this report are:

1. Sustainability Appraisal (November 2017) (Plan:MK Examination Document ref: MK/SUB/005);
2. Sustainability Appraisal (Non-Technical Summary) (November 2017) (Plan:MK Examination Document ref: MK/SUB/006);
3. Initial Sustainability Appraisal (February 2017) (Plan:MK Examination Document ref: MK/SUB/013); and,
4. Sustainability Appraisal Scoping Report (October 2016) (Plan:MK Examination Document ref: MK/SUB/012).

1.3 The structure of this report and the focus of each section is as follows:

- **Section 2 ‘Methodology’** – this section outlines the methodology used by the Council in the Sustainability Assessment process.
- **Section 3 ‘Critique’** – this section provides a critical review of the judgements and assessments made against relevant parts/objectives/sites of the Sustainability Appraisal.
- **Section 4 ‘Conclusions’** – and recommendations from Section 3.

## 2. METHODOLOGY

2.1 This section outlines the methodology used in the Council's Sustainability Appraisal process.

2.2 Paragraph 2.1.2 of the Sustainability Appraisal (November 2017) report clarifies that:

*"In-line with Regulations, a report (known as the SA Report) must be published for consultation alongside the draft plan that essentially 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan and reasonable alternatives'<sup>1</sup>"*

2.3 The Sustainability Appraisal must then be taken into account, alongside consultation responses, when finalising the plan.

2.4 The SA identifies the questions that the report answers namely:

- What's the plan seeking to achieve?
- What's the SA scope?
  - What's the sustainability 'context'?
  - What's the sustainability 'baseline'?
  - What are the issues and objectives that should be a focus?
- What has plan-making / SA involved up to this point?
- What are the SA findings at this current stage?
- What happens next?

2.5 In relation to the first question: 'What is the plan seeking to achieve' there are a total of **17 objectives**. Those of relevance for the purposes of this report are:

- Reflect the recommendations of the **MK Futures 2050** Commission Report, the land use planning implications of the Strategy for 2050 and its Six Big Projects, inter-alia; Making Milton Keynes the hub of the Cambridge-Milton Keynes-Oxford growth.

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<sup>1</sup> Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004

- Deliver land for a minimum of **26,500 new homes** within the Borough between 2016 and 2031, principally within and adjacent to the city.
- Reflect the National Infrastructure Commission Interim Report (November 2016) and support development along the **Cambridge-Milton Keynes-Oxford growth corridor** reflecting the Council's preferred route (2).
- Work jointly with neighbouring authorities and other key organisations on the planning of any development located on the **edge of Milton Keynes** (outside the Borough boundary) so that these areas are integrated with the city and contribute to its role and character.
- Manage increased **travel** demands through, inter-alia; Promoting improvements to public transport and supporting the development of the East – West rail link between Oxford and Cambridge and – Extending the grid road pattern into any major new development areas.

2.6 Table 4.1 sets out the 12 sustainability objectives established through scoping work and presents each alongside a short list of more specific issues. Taken together, the sustainability objectives and issues presented in Table 4.1 provide a methodological 'framework' for SA.

2.7 The report then sets out the approach to the assessment of reasonable alternatives. As stated in Paragraph 5.1.2 of the SA, the aim is;

*"Not to recount in detail the entire story of plan-making to date, but rather to explain how work was undertaken to develop and then appraise **reasonable alternatives** prior to finalising the Proposed Submission Plan"*

### 3. CRITIQUE OF EVIDENCE

3.1 This critique does not seek to address the methodology within the SA but rather the application of that methodology and the conclusions reached from it.

3.2 The elements of the SA under review are as follows:

- Plan MK objectives,
- Strategic Site Allocation Options

#### Plan MK objectives

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3.3 As discussed above, to the first question: 'What is the plan seeking to achieve' there are a total of 17 objectives. Those of relevance are discussed in detail below.

3.4 Objective Two of the Plan:MK objectives (Paragraph 3.2.1 of SA, 2017) states the following;

*"Deliver land for a minimum of 26,500 new homes within the Borough between 2016 and 2031, principally within and adjacent to the city".*

3.5 Within Plan: MK, it is not clear why a figure of 26,500 new homes has been calculated with a plan period up to 2031.

3.6 The Initial Sustainability Appraisal (ISA)(MKSUB013) highlights three reasonable policy options (ISA, 2017; Page 16) on the quantum of housing growth in Milton Keynes which were considered;

- **Option A-** Seek to deliver 26,500 new dwellings over the plan period or 1,765 new dwellings per annum. This would be in line with the OAN target identified in MKC's housing evidence, the SHMA.
- **Option B-** Seek to deliver 30,000 new dwellings over the plan period or 2,000 new dwellings per annum. This option would deliver more housing than the OAN identifies however it is dependent on housing capacity in the Borough.
- **Option C-** Seek to deliver housing based on past delivery rates which are lower than the yearly OAN figure. This option would deliver less housing than the OAN identifies.

3.7 Based on OAN figures, the ISA states that all three options are likely to result in similar types of effects however the extent will differ, with greater positive effects on growth objectives likely with

Options A and B. The ISA further states that “Option C is not considered to be a suitable policy option to take forward as it would under-deliver on housing” (ISA, 2017; Page 23).

3.8 In addition to the above, the ISA states the following;

*“The most suitable option to take forward in the Plan at the moment is considered to be **Option A** because it seeks to deliver growth in line with housing need identified for the Borough over the plan period and it is considered that in the first instance the Borough should **at least** seek to meet need as per NPPF requirements” (ISA, 2017; Page 23).*

3.9 With the above in mind, the ISA recognises that Option B “would deliver more housing”, however it would potentially result in greater environmental effects and potentially require MKC to find additional land. Furthermore, Option B was also rejected due to the uncertainty over emerging strategies and infrastructure development such as the MK Futures 2050 work, progress of the East-West Rail and the National Infrastructure Commission’s work on the caMKoc Arc, hence it would be premature to deliver housing at a rate above the OAN. We consider that the rejection of this option is unjustified as whilst there may be uncertainty on the finer level of detail for these emerging strategies there is nevertheless considerable certainty that Milton Keynes is a key growth area for the Government in relation to infrastructure investment.

3.10 The same reasoning however does not appear to have been a factor in the Council reflecting on options for determining a suitable plan period. The MK Futures 2050 Commission Report, highlighted a more ambitious plan period of up to 2036, based on their view that the city should continue to grow at the same rate through to 2050, and therefore acknowledging longer term requirements.

3.11 National policy also guides identification of suitable plan periods with paragraph 157 of the NPPF stating:

*“Local Plans should: be drawn up over an appropriate time scale, preferably a **15-year time horizon**, take account of longer term requirements, and be kept up to date.”*

3.12 Noting the requirement to identify reasonable alternatives, these factors dictate that the lack of an alternative (longer) plan period is a flaw in the SA process.

### **Refined Site Options**

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3.13 Chapters 6 – 8 of the SA (2017) addresses the refined Site Options through explaining the process of establishing reasonable alternatives (Chapter 6), presenting the outcomes of AECOM’s appraisal of reasonable alternatives (Chapter 7) and explaining the Council’s reasons for supporting the preferred options (Chapter 8).

3.14 Chapter 6, Table 6.2 (of the SA, 2017) identifies the Site as Option no.9 (Wavendon Golf Course) capable of delivering circa 700 units in the plan period.

3.15 The commentary for site option no.9 (Wavendon Golf Course) comprises the following:

- Golf course east of Wavendon, south of the Core Strategy Strategic Land Allocation; comprising much of the 'triangle' of land bounded by Newport Rd, Lower End Rd and Cranfield Rd.
- Assessed as an element of the 'Wavendon and Woburn Sands' strategic site option within the March 2017 Interim SA Report.

3.16 The main issues considered in the SA (set out in Table 6.4 of the document) were the following;

- Further expansion to the East makes **strategic sense** in certain (socio-economic) respects, recognising transport infrastructure and the need to realise opportunities within the Oxford to Cambridge Corridor;
- The Site is sequentially **less preferable** to the SE MK Site;
- It is subject to a degree of constraint, with "**medium**" **landscape sensitivity** (including due to evidence of former parkland) and three clusters of listed buildings (ten in total) adjoining the site;
- The site would need to come forward subsequent to completion of the Strategic Land Allocation, which inherently leads to **uncertainty in respect of delivery timescale**;
- The site is smaller and might be of **insufficient scale to deliver new community infrastructure** (eg. Primary school) hence growth could serve to "**load pressure**" onto existing/proposed infrastructure in the vicinity; and
- There is extensive committed growth to the east of MK- within the Eastern Expansion Area and the Strategic Land Allocation- should be given opportunity to "**bed in**".

3.17 Appendix III, Table B of the SA, "*Informal Appraisal of shortlisted MK Edge Site Options*", presents a narrative on the site options, under the headings of the established SA framework. This provides a more detailed analysis of the findings and seeks to systematically discuss various site options in terms of each of the 18 SA topics / objectives.

#### South East of Milton Keynes

3.18 Under the '**home**' objective of the SA it is noted that:

*"Another urban edge site associated with a notable delivery issue is **South East MK**, on the basis that there is the potential for a new dual carriageway road to be delivered through the site, as part of*



*the Oxford to Cambridge Expressway. There is no certainty, as the preferred route for the Expressway is yet to be selected; however, it is apparent that if either of the two northern broad route options was to be selected (there are three broad route options in total), then there could potentially be a need for a new road through the site.”*

- 3.19 It also states that the road would need to be delivered ahead of housing hence presenting a considerable risk of delay to housing.
- 3.20 The SA however, fails to consider how the risk of delay may impact on the ability of the site to deliver within the plan period.
- 3.21 The ‘**landscape**’ section states that the site has ‘low’ landscape sensitivity and states that the landscape work suggests the need for small scale development.
- 3.22 The Landscape Sensitivity Study (MKENV001) assesses the allocated site in two parts (Site 10 and Site 11). The latter forms the substantial element of the land area and in relation to this page 57 of the study considers that:

*“capacity in this small area is limited because of constraints relating to the settings of the steep scarp of the Greensand Ridge and the issues of coalescence between Milton Keynes, Bow Brickhill and Woburn Sands. Any development should be small scale and should reinforce the landscape framework.”*

- 3.23 It is not however clear how this assessment regarding the capacity of the site has informed the detail of the site allocation and its assumed delivery of 3,000 units.
- 3.24 It is considered that further detail on this is presented to provide certainty that the site allocation is sound.

#### **East of the M1 (north and south)**

- 3.25 The ‘**landscape**’ section identifies that not all of the land is covered by the ‘Landscape Capacity Study’ but that *“it seemingly is subject to relatively low constraint”*.
- 3.26 The Landscape Sensitivity Study (MKENV001) identifies at paragraph 2.3.3 that not all land around Milton Keynes was considered and some parcels removed from consideration due to constraints such as the 1 in 100 year flood risk constraint.
- 3.27 The East of the M1 site is covered in part by landscape areas 4, 5 and 6 (the latter two areas cover wider areas of land which extend outside of the allocation). A larger area of the proposed allocation (between areas 4 and 5) remains unassessed in the document.

- 3.28 Although not made clear, this is assumed to be because this land falls within the 1 in 100 year flood risk area and hence outside the scope of the assessment. Figure 4.1 of the document shows site 4 in relation to the missing land which is identified as area 2d 'Ouzel North Urban River Valley'. The earlier Landscape Character Assessment Study (MKENV002) at page 26 identified this area as a triangular piece of land between the A509, M1 and Newport Pagnell centred on the River Ouzel floodplain which is mostly within the Ouse Valley Linear Park.
- 3.29 The Sustainability Appraisal's assessment of this site is therefore incomplete and fundamentally flawed.
- 3.30 The **'water'** section identifies that the East of the M1 site is subject to areas of Flood Zone 2 and 3. Table 6.4 (of the SA, 2017) states that East of M1 (north) is significantly constrained by flood risk associated with the river Ouzel, which could have implications for masterplanning and East of the M1 (south) has some (more limited) flood risk and is constrained by two streams. Paragraph 10.16.8 of the SA also states that delivery of this site (East of M1) is uncertain, and that there will be good potential to avoid/mitigate flood risk through careful masterplanning.
- 3.31 No evidence is given in the SA regarding the application of the sequential or exception tests for this proposed site allocation as required by national policy. As stated in the Strategic Flood Risk Assessment (April, 2015), the purpose of the Exception Test is to ensure that new development is only permitted in Flood Zone 2 and 3 where flood risk is clearly outweighed by other sustainability factors and where the development will be safe during its lifetime, considering climate change.
- 3.32 Further, the reliance on "careful masterplanning" and the unpredictable effects from flood risk events indicate the East of the M1 site is less preferable in sustainability terms than sites within Flood Zone 1.

#### **Wavendon Golf Course**

- 3.33 Table B (of the SA) also states that infrastructure capacity is of concern to both the Wavendon Golf Club and Eastern Broad Area. It states that: *"there is an understanding that extensive committed growth to the east of MK - within the Expansion Area and Strategic Growth Location - should be given time to 'bed in'"*.
- 3.34 No further evidence in relation to this statement is provided and it is not clear what this process of 'bedding in' would look like or when it would be concluded. Fundamentally however the alignment of housing growth to committed delivery of infrastructure, services and facilities, provides the basis for sustainable patterns of growth.

- 3.35 In relation to the '**communities**' objective, the SA (2017) considers that community infrastructure could be delivered at MK urban edge sites. Table B suggests that the Wavendon Golf Course site would be unlikely to deliver a primary school.
- 3.36 The '**services and facilities**' section of Table B (of the SA) also states that the majority of MK edge sites would be of a scale sufficient to deliver a new primary school, although there is a 'question-mark' regarding the ability of the Wavendon Golf Club site to deliver a primary school on site.
- 3.37 The SA does not however take account of the site's proximity to existing and proposed services and facilities. The site is located immediately south of the Local Plan's proposed Strategic Land Allocation (Policy SD8). The School Place Planning report (MKCOM006) identifies at page 32 that the allocation has been identified for a new development of 2,900 dwellings with development due to commence in 2018. Two 3FE primary school sites have been identified; one has been allocated for the expansion and relocation of St Mary's Wavendon CE Primary School. A 6FE secondary school site has also been identified. The need for opening both schools is currently anticipated for 2022-2023.
- 3.38 The SA fails to take into consideration the benefits of the Wavendon Golf Club site given its geographical proximity to the existing Strategic Land Allocation and planned implementation of new schools in the area.
- 3.39 In relation to the '**health**' section it is noted that the Wavendon Golf Course site would not likely deliver a local neighbourhood centre and that such centres might be able to deliver a doctor's surgery subject to discussion with the Clinic Commissioning Group (CCG).
- 3.40 There is no evidence to state that delivery of a neighbourhood centre, as part of the planning application on any of the site allocation options, would ensure delivery of a doctor's surgery. Suitable healthcare contributions are likely to be informed by the CCG as part of any Section 106 agreement with future planning applications. In any event, if a clear need is identified the Wavendon Golf Course site offers the possibility to deliver a health centre whether or not this would be in a local centre complex. The provision of a neighbourhood centre on a site is therefore not a sound reason to conclude that a site allocation option would score better against the 'health' sustainability objective than another site.
- 3.41 The '**home**' section of the SA states that both the Wavendon Golf Course site and the wider Eastern Broad Area do not currently adjoin the MK urban edge and: *"hence would need to come forward subsequent to completion of adjacent sites. This inherently results in a delivery timescale that is less certain than that of an equivalent site not reliant on an adjacent site coming forward first."*
- 3.42 The Wavendon Golf Club site is located immediately south of the Strategic Land Allocation (Policy SD8) allocated in the Local Plan. Planning applications for part of this area, known as Glebe Farm,

have previously been submitted and following the granting of outline planning permission (ref: 13/02382/OUTEIS) further reserved matters applications have been approved for the initial infrastructure works (ref: 15/01025/REM – approved November 2015) and an initial phase of 160 units between Lower End Road and the A421 (ref: 17/02883 – approved March 2018). Planning applications on the eastern end of the allocation, the area known as Eagle Farm, are also moving forward following the grant of outline planning permission (ref: 13/02381/OUTEIS) and include reserved matters for first phase infrastructure works (ref: 15/00990/REM) and an initial phase of 259 dwellings (ref: 17/01038/REM).

- 3.43 The Council's own housing trajectory (MKSUB004a2) indicates that Glebe Farm and Eagle Farm will deliver units in the early part of the plan period with Glebe Farm delivering a total of 1,140 units by 2023/24 and Eagle Farm a total of 410 units by 2021/22 .
- 3.44 Therefore, it is evident that the Wavendon Golf Club site could be delivered to align with the implementation of the Strategic Land Allocation over the plan period.
- 3.45 The **'transport'** section of Appendix III of the SA (page 89) states that the sites to the south east of Milton Keynes, which can be assumed to include the Wavendon Golf Course site, benefit from proximity to existing train stations. However, this fails to reference the future implementation of EWR and the fact that some stations, such as Woburn Sands, will benefit from greater frequency of services and connections.
- 3.46 As stated within the National Infrastructure Commission (NIC) Report (MKINF004) Cambridge, Milton Keynes and Oxford are amongst the UK's most productive, successful and fast growing cities with infrastructure playing be a vital part of their investment package. The report goes on that a national investment in the East West Rail project and the proposed Oxford-Cambridge Expressway will enhance connectivity across the caMKox Arc, expanding labour markets of key towns and cities, as well as improving connections with international gateways such as Heathrow.
- 3.47 In order to maximise the potential of these schemes the NIC report proposes: *"limiting the number of stations in order to safeguard commuting times, and focusing larger scale development around a smaller number of transport hubs and interchanges"*. One of these transport hubs, is Woburn Sands station which is located approximately 0.5 miles south of the Site.
- 3.48 In addition to this, the NIC states that to ensure the railway delivers an attractive commuter service, the number of stations on the EWR shall be restricted to those where housing can be delivered at scale.

- 3.49 Given the aims of the NIC Report to enable the creation of new communities, sites that are located in close proximity to stations (such as Woburn Sands) and shall benefit from EWR should be given increased weight and importance in the SA.
- 3.50 In relation to the objective to '**combat climate change**' the section focuses on the benefits of low carbon heat or energy / energy networks and concludes for other sites, such as land to the east of the M1 that they offer the possibility of delivering such systems and hence perform well against this objective.
- 3.51 The scoring does not however reflect on one of the benefits of sites located well served by public transport and the potential for this to encourage lower levels of reliance on private motor vehicles. Again, the Wavendon Golf Course site is located approximately 0.5 miles from Woburn Sands Rail Station and should be scored more favourably against the combating climate change criteria.
- 3.52 Table B of the SA refers to '**heritage**' issues and that the Wavendon Golf Course site is: *"perhaps the most constrained site options with evidence of a former parkland landscape and three clusters of listed buildings (ten in total) adjoin the site."*
- 3.53 However, as is evident from the Heritage Assessment (appendix A4 to the Matter 5 Statement), although development within the Site could result in change to the prevailing setting, and as a result, less than substantial harm, to the significance of the Grade II\* Listed Wavendon House and associated assets (including parkland landscape) a sympathetic and sensitively composed development design could offset any such potential harm to the significance of these assets.
- 3.54 Due to the reasons above, the presence of heritage assets does not prevent a suitable design being brought forward, and it does not prohibit a suitable design solution to mitigate any impact on heritage assets.
- 3.55 The '**landscape**' section states that the site has a 'medium' landscape sensitivity (including due to the former parkland setting). Table 6.4 of the main SA (footnote 20) identifies this as coming from the Landscape Sensitivity Study (2016).
- 3.56 However, the Landscape and Visual Appraisal (LVA)(appendix A3 to the Matter 5 Statement), considers that there are errors in the Landscape Sensitivity Study which warrant a reassessment of the identified 'medium' landscape sensitivity definition. The LVA (Section 4) considers given the limited intervisibility between the site and its surrounding landscape similar conclusions should be drawn regarding the sense of separation it can create to the nearby settlements of Woburn Sands and Wavendon as was identified for part of the South East Milton Keynes site allocation. Therefore, this LVA report identifies the landscape sensitivity of the site to be 'low' and not 'medium' as concluded in the Landscape Sensitivity Study,

- 3.57 The **'employment'** section focuses on the possibility of sites to deliver employment uses alongside housing.
- 3.58 Although the objectives of the Plan: MK highlights the need to provide employment locally, the SA does not focus on the benefits of locating new housing in close proximity to employment uses specifically. The site is located in close proximity to a wide variety of employment uses, including industrial warehouses such as John Lewis and Waitrose and also in close proximity to Kingston District Centre and the centre of Milton Keynes.
- 3.59 In addition to the existing employment uses surrounding the Site, land South of Milton Keynes in South Caldecotte is allocated for a minimum of 195,000m<sup>2</sup> of Class B2/B8 and ancillary B1 employment floorspace within the plan period. This allocation is located approximately 3 miles from the Site.
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## 4. CONCLUSION

- 4.1 It is clear that there are many flaws in the Sustainability Appraisal process which has led to inaccurate conclusions being reached on the suitability of sites considered.
- 4.2 In relation to the South East Milton Keynes site the SA fails to consider how the uncertainty regarding the routing of the Oxford to Cambridge Expressway through the site as well as conclusions on its limited capacity in landscape terms impacts the ability to deliver the proposed 3,000 units within the plan period.
- 4.3 A large portion of the East of the M1 site has not been assessed for its impacts in landscape terms. Further uncertainty as to the sustainability of the allocation is evident from lack of evidence on the application of the flood risk sequential and exception tests.
- 4.4 A number of flaws are also evident from the assessment of the Wavendon Golf Course site which lead to unfairly negative conclusions on its sustainability credentials. The scope of the SA is limited and fails to consider the benefits offered by the site's highly sustainable location in close proximity to services, facilities and employment opportunities offered by the Strategic Land Allocation SD8.
- 4.5 It is therefore clear that the flaws in the Sustainability Appraisal have led to unsound site allocations and an unsound Local Plan.