

Evidence base document: ED204 Sustainability Report Addendum

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General

- 5.20 CN note and support the conclusions of document ED204 that has been prepared to present information on the proposed modifications, and alternatives, with a view to informing the current consultation and subsequent plan finalisation. CN would re-iterate that the 'reasonable alternatives' as set out in Table A of ED204, namely Eaton Leys and Salden Chase extension, were not considered suitable for development in the HELAA, did not form part of the VALP 2017 Sustainability Appraisal (SA) and were not included in any of the nine reasonable alternative options.
- 5.21 ED204 considers each of the three sites against the sustainability topics, categorises the performance, and ranks the alternatives in order of that performance. Using the results in Table B of the SA Addendum, a combined ranking for each option can be produced and we have set this out in a summary table that we have prepared overleaf which, although rather crude, does highlight which option performs the best across all of the sustainability topics as a whole, with no weighting applied.

Table 6: CN summary table of SA Addendum sustainability topic performance and rankings

	Eaton Leys	Salden Chase extension	Shenley Park
Combined score	14	12	10
Top ranks / gold stars	2	4	4
Overall rank	3rd	2nd	1st

- 5.22 Whilst CN support the conclusions of document ED204, most notably in paragraph 5.3.2 *'This leaves Shenley Park (WHA001) as the clear 'stand out' site, on the basis that the HELAA identifies it as being part suitable for housing'* and consider it a sound appraisal of the main modifications, there are a number of factual comments to be made, highlighting some small inaccuracies that, whilst not affecting the overall conclusions, should be raised for completeness.

Communities

- 5.23 The first point to raise relates to the Communities topic, and the table at paragraph 9.5.1 suggests there is some uncertainty in respect of secondary school provision, as well as within Appendix I page 59. CN would suggest that the site specific policy for Shenley Park is explicit that an appropriate contribution to secondary provision will be made by the site in consultation with the Education Authority. In this respect CN would query why Shenley Park has been scored lower on this aspect than Salden Chase, when both would be affected in the same way, i.e. be required to make contributions to secondary provision to create a larger secondary school site, possibly to extend, albeit the overall conclusion remains unchanged.

Heritage

- 5.24 Moving on to the heritage topic, CN would concur that the table attached to paragraph 9.7.1 is correct in its references to Heritage Assets/Archaeology. However, the paragraph goes on to make clear that the potential sensitivities of Shenley Park in terms of heritage/archaeology, can be appropriately mitigated through implementation of the proposed site specific policy Sections G, I and M (these are all set out within the table). CN note that this is the same conclusion reached in the AVDC Heritage Appraisal (ED222) and would therefore query why

Salden Chase is ranked higher than Shenley Park, given the identified impacts appear to be the same. However, again this would not change the overall conclusion reached in terms of Shenley Park being the most appropriate location for the additional growth adjacent to Milton Keynes.

Landscape

- 5.25 From a landscape perspective, the Table within paragraph 9.9.1 of ED204 refers to the Strategic Landscape and Visual Capacity Study (2017) (SLVCS) rather than document ED210A, which was a subsequent and more detailed piece of work completed by consultants BMD for AVDC. ED210A comprises a Landscape and Visual Capacity Comparison Assessment (11 June 2019), which focuses on a comparison of three sites to the fringes of Milton Keynes as to which would be best to deliver 1,000 units. We understand from AVDC Planning Policy Officers that the 2017 report has formed the basis of their considerations, as this document considered 2,000 units at Shenley Park, and the 2019 report was focused purely on 1,000, which the main modifications allocation at WHA001 is in excess of.
- 5.26 CN would wish to make a number of observations about the conclusions of the 2017 report that are referenced in the first section of the Table on page 42 of ED204. The 2017 report states in the Appraisal Judgements table for WHA001 that, '*Potential to develop 35% of the site as residential development, to the north of Shenley Rd, east of Bottle House Farm and against the eastern edge of Milton Keynes. Existing blocks of woodland along north, south and east boundaries could be extended to enclose development and minimise its effect on surrounding landscape. Topography of remaining site exposes it to surrounding landscape making it less suitable to develop.*' This reference to only 35% of the site being suitable for development is then reproduced in the aforementioned table in ED204. The document then states '*it is nonetheless recommend that this policy (WHA001) might 'go further' by specifying broad areas within the site that are more sensitive from a landscape perspective.*' This is also mentioned in paragraph 9.9.2 of ED204.
- 5.27 Taking the 35% point first, the 2017 SLVCS concluded that there was no capacity for development south of Shenley Road, due to the topography exposing itself to the surrounding landscape. CN strongly disagree with this conclusion. While the southern part of the Site contains a small valley feature, the sloping topography has a limited interface with the surrounding landscape. To the north, a break in slope and mature tree belts along Shenley Road prevent views. To the south beyond the A421, a large woodland (Thrift Wood) contains all views. To the west, there are views of the adjacent fields, but this is soon contained by mature woodland blocks (Coddimoorhill Wood and Thickbare Wood). There are no wider views from the east due to dense tree belts, with only short distance views glimpsed through the tree belt from the bridleway directly adjacent to the site boundary. To the south-east, the land falls towards the vegetated Tattenhoe Valley Park and with more distant views towards the Salden Chase site, and eventually to the Greensand Ridge, but these views would not be substantially affected. Furthermore, the development of Salden Chase will change the character of the outlook to the south-east.
- 5.28 Based on the above information, CN query the veracity of the 2017 SLVCS conclusions in relation to Shenley Park WHA001 around the limitation of only 35% of the site being suitable for development, which is carried forward into ED204. The second, linked point, is ED204 then making reference to the WHA001 potentially going further '*by specifying broad areas within the site that are more sensitive from a landscape perspective*'. This is also referenced in the concluding paragraph 9.14.2 (bullet 2). CN do not agree with the SA Addendum Report on this point, and it is noteworthy that Policy WHA001 as proposed in the main modifications includes the following criteria covering matters of detail relating to landscape and sensitivity:
- Clause a) already indicates that density should respect adjacent settlement character
 - Clause f) states the scheme should be landscape led and informed by an LVIA
 - Clause f) encourages the creation of a long-term defensible boundary to the west
 - Clause g) identifies the setting of Whaddon Village and Conservation Area should be conserved by a managed countryside buffer and enhanced Briary Planation
 - Clause h) requires an extension into the site into Tattenhoe Valley Park

- Clause i) requires an ecological management plan for the management of existing and new features
 - Clause j) requires the retention, where practicable, of existing trees and hedges. This will help contribute to ensuring the development is landscape led.
- 5.29 CN consider that Policy WHA001 (in largely its current form), together with a later LVIA and subsequent masterplan, are considered sufficient tools to identify the suitable areas of sensitivity and there is no need to go further at this stage of site allocation. From the content of Policy WHA001, it seems AVDC officers share the same view, which is fully supported.
- 5.30 Turning to the specific scoring in the 2017 SLVCS of the three sites adjacent to Milton Keynes, sites were considered with limited levels of detail, however, there followed a simple matrix with 15 different criteria ‘scored’ red, amber or green. The report states at paragraph 1.2.11, *‘the most eligible sites for development (taking into account the potential developable area noted by the appraisal) would be those with a high proportion of green scores and a limited proportion of red’*. It is noteworthy that of the 15 criteria assessed, when comparing the three sites to the south west of Milton Keynes, Shenley Park WHA001 is seen to have the least red and amber scoring criteria and the most green criteria. This indicates it is more suitable for development in landscape and visual terms than the other two sites in the locality.
- 5.31 This conclusion from the 2017 SLVCS, prepared by BMD, is carried forward into the 2019 document (ED210A), albeit this later report was based on a brief to find the most suitable place for exactly 1,000 units. As noted in paragraph 5.25, this number has been increased to *‘at least 1,150’* in Policy WHA001 of the VALP. Notwithstanding that issue, Section 3 of ED210A provides a review of the host character areas and then an elevation of the sites. This can be summarised as set out in the table below:

Table 7: Landscape criteria of three sites adjacent to Milton Keynes

Criteria for each Site	Eaton Leys	Salden Chase Extension	Shenley Park
Value of Site	High	Medium	Low
Susceptibility of site to accept development	Medium	Medium	Medium
Sensitivity of site to development	High	Medium	Medium

- 5.32 Specifically in relation to Shenley Park, paragraph 3.1.21 notes the WHA001 site is contained to the south by a property, namely Wood Pond Farm. This is correct in relation to the proposed allocation in the VALP. However, as noted in Section 2, this property will come forward with the remainder of the site as part of the overall scheme. Paragraph 3.1.24 states that the fields are small, whereas CN consider that the fields to the north are large, extending in one large field from Bottlehouse Farm to Briary Plantation, equalling circa 26ha.
- 5.33 ED210A concludes at paragraph 3.2.26 that this results in *‘the Site having a less distinct character to that of the wider LCT. Therefore, the **value** of the landscape is considered to be **Low** due to it being typical of the wider arable landscape in the district. The **susceptibility** of the landscape to accept development is considered to be **Medium** due to the level of containment provided by existing mature vegetation. Overall the landscape is considered to have a **Medium sensitivity** to development.’* CN would broadly agree with this assessment of the landscape character of the site that will be carried forward within any future masterplanning process.
- 5.34 Moving back to document ED204, the table at paragraph 9.12.1 indicates there could be potential tensions between a new road between the A421 and H6/H7 and landscape objectives. This link road, as required by policy, would involve a route across the southern part of the site from the A421 to connect with Childs Way H6 across the northern part of the

site. The landscape sensitivity of the southern part of WHA001 has already been discussed in this section (and is adequately addressed by the policy for WHA001). However, it is clear that the provision of a route from the A421 northwards across the site would have some unavoidable landscape effects on character.

- 5.35 However, CN advise that a route could comfortably be incorporated into a new development and suitable mitigation provided. This would occur at the access point from the A421, crossing the brook/extension of Tattenhoe Valley Park, crossing the tree belt along Shenley Road and accessing either H6 or H7. Along with the remainder of the development, the design of the road would be landscape led. This would apply to horizontal and vertical alignment and mitigation would ensure no tensions are apparent.

Education

- 5.36 CN are unsure as to the purpose of the comment around viability and secondary school provision in this table. As our response to MM076 demonstrates, adequate contributions towards secondary school provision will be made in consultation with the Education Authority, and these contributions will be intrinsically linked to the capacity of the site. That capacity will be borne out of a masterplanning process that will be underpinned by a landscape led approach.
- 5.37 CN's final specific point on the content of ED204 relates to Appendix I and the Table within that Appendix on page 59. This makes comment on the potential for a secondary school to '*be located in the constrained southern part of the [Shenley Park] site.*' CN would comment that this statement is premature (as noted by our comments in Section 3) as the requirement for secondary provision generated by any development at Shenley Park is likely to be through financial contributions rather than a new school site, a position that AVDC have been discussing with the Education Authority. The location of any services and facilities will be an integral part of the masterplanning process and linked to a wide variety of issues in conjunction with landscape.

Summary

- 5.38 Whilst CN have raised a number of factual issues with the content of ED204 and some of the information and reports referred to within it, CN supports the overall conclusion at paragraph 9.14.5 that the original conclusions within the SA Report supporting the submission version of the VALP broadly hold true for the submitted plan, plus proposed main modifications.