

**South East Milton Keynes
Strategic Urban Extension
Development Framework SPD**

06/21

Additional Representations, on behalf of Wavendon Parish Council, following
East/West Rail Consultation



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1 Introduction

- 1.1** The following additional representations are made in relation to the Draft South East Milton Keynes Strategic Urban Extension Development Framework SPD and have been prepared in consultation with, and on behalf of, Wavendon Parish Council (WPC).
- 1.2** Initial representations were submitted to the SEMK SPD consultation in April 2021. The consultation period has subsequently been extended to accommodate comments resulting from the ongoing East/West Rail consultation which is due to end on 9th June 2021.
- 1.3** The following representations have been prepared following the current EWR consultation highlighting those elements of relevance to Wavendon Parish Council and the proposed SEMK.
- 1.4** A key concern is the likely prematurity of the SEMK SPD adoption given the ongoing EWR consultation and Oxford to Cambridge Arc consultation, which is scheduled for November 2021. Both of these proposals could have significant impacts on the form and implementation of SEMK.
- 1.5** Wavendon Parish Council therefore request that the adoption of the SEMK SPD be delayed until the implications of EWR and the Oxford – Cambridge Arc are fully understood, there is greater certainty in terms of the agreed alignment of routes and when the impact of new development (SLA's) and infrastructure can be properly assessed.
- 1.6** As suggested in Wavendon Parish Council's initial SEMK representations, given the importance of these decisions Wavendon Parish Council considers that Milton Keynes Council should hold an open forum to explain the comments received as part of this consultation, the issues resulting from the EWR and Oxford – Cambridge Arc consultations and how they will be incorporated into the SPD. Following this the Council should publish a second draft SPD, for consultation, taking into account the comments received and including up to date strategic transport data. This is critical for the effective delivery of the SPD.

2 SEMK representations made to date

2.1 To date representations were made, on behalf of Wavendon Parish Council, to the South East Milton Keynes SPD Consultation (SEMK) in April 2021. As part of this consultation general comments were made in relation to the East – West rail proposal, relating to the information available at that time, which can be summarised as follows:

- there are currently many unknowns relating to the proposed East/West rail line. These include future plans for stations and level crossings along the EWR line and detail relating to alternative options should they be closed;
- a number of scenarios have been considered, in the context of the SPD, relating primarily to the possible closure of level crossings and the creation of new road bridges at different locations between Bow Brickhill and Woburn Sands.
- Wavendon Parish Council consider that currently there are too many unanswered questions (such as the future of the railway, the future of the crossings at Woburn Sands/Bow Brickhill and the location of Woburn Sands Station), that would prevent SEMK from being properly implemented. As part of any proposal Wavendon Parish Council consider that a railway crossing must be maintained as part of any development and kept open.
- The SEMK SPD refers to the Woburn Sands level crossing potentially being closed for long periods due to the flow of high speed trains. Wavendon Parish Council would not support this without alternative workable solutions being considered. A close and easily accessible crossing available to the whole Parish is vital to maintain access to the wide range of shops and services, including doctors and dentists, in Woburn Sands.
- The adoption of the SPD should be delayed until there is more clarity following the EWR statutory consultation and further discussions have been undertaken with East West Rail Company, Milton Keynes Council, Wavendon Parish Council, Walton Community Council, Woburn Sands Town Council and Bow Brickhill Parish Council. Wavendon Parish Council consider that these discussions should involve all stakeholders and should not be developer led.

2.2 Following the current EWR consultation the basis of the above objections have not changed and will now be expanded upon having regard to the detail contained within the EWR Consultation documents. The following sections highlight those elements of the consultation documents relevant to the Wavendon area and details the response of Wavendon Parish Council.

3 Representations made in relation to the EWR Consultation: Concepts 1 and 2

3.1 The draft SEMK SPD has been prepared to support the implementation of Plan:MK and adopted Policies SD10 and SD11. The SEMK SPD seeks to establish how the requirements of Policy SD11 will be met.

3.2 In terms of transport related issues Policy SD11 states that the site will be required to:

“Ensure development is well connected and integrated with adjacent grid squares, public transport services and the strategic and local highway grid network in line with the Council’s Mobility Strategy. Provision of grade separated crossings of the railway should be provided or retained as appropriate to ensure connectivity of the southern areas of the site with the remainder of the site and the city to the north in line with policies CT1 – CT3 and CT5. The number, location and purpose of any such crossings will be set out within the development framework”.

Strategic Movement Network (4.3 – Movement Framework)

3.3 The draft SEMK SPD does not propose a preferred strategic movement network as uncertainty still exists over the alignment of East West rail. Furthermore, Milton Keynes Council has failed to undertake a Strategic Transport Review for the area and so there is no up to date transport data available which would properly inform transport related decisions. Three scenarios are therefore outlined in the draft SPD that the EW Rail Company may adopt as part of an associated strategic network movement response.

3.4 It is anticipated that the final version of the SEMK SPD will contain one spatial framework plan for movement. The draft SPD states that if the strategic movement issues around the future of the railway line have not been resolved the final version of the SPD will contain a preferred movement framework alongside a fallback position.

3.5 Wavendon Parish Council considers this to be an unacceptable approach, given the scale of development currently coming forward in this part of Milton Keynes, and requires certainty as to the strategic movement network that will underpin the

masterplan. The Council's current approach is contrary to the advice contained in both national and local planning policy.

East West Rail Representations

- 3.6** The Wavendon/Woburn Sands area is situated within the Marston Vale line as identified in the consultation documents. The form and positioning of the line is far from concluded and will have significant implications on the SEMK master plan. At this formative stage EWR have identified two ways in which the Marston Vale line could be upgraded as follows:

Concept 1: would involve the continuation of the existing hourly stopping service to serve all Marston Vale line stations with a new limited stop EWR service calling at both Woburn Sands and Ridgmont, four times an hour. The hourly stopping service at intermediate stations would enable a change onto a faster EWR train at either Woburn Sands or Ridgmont, running twice hourly, for connections to Oxford and Cambridge.

The hourly stopping service would need to wait in additional sections of track, known as "passing loops", to allow EWR trains to overtake so could run more slowly. As part of this process the consultation document advises that most of the stations would see minimal, if any, upgrades apart from the relocation of Ridgmont and Bedford St. Johns.

Concept 2: would involve five new merged stations on the Marston Vale line benefitting from at least two EWR services every hour, with some having four. This would mean that more communities would have access to more frequent and faster services, direct to more locations.

Two EWR stopping trains would run every hour between Bletchley and Cambridge, calling at all five stations. In addition, two EWR Oxford – Cambridge trains would call at Woburn Sands and Ridgmont. These services would replace the current hourly stopping service and the ten existing intermediate stations would be merged, creating five new modern stations with better facilities in locations more suitable for existing needs. This approach would enable new infrastructure to be more focussed to accommodate future growth.

- 3.7** Many residents would need to travel a little further to their nearest station. In this respect EWR state that they are developing plans for improved connectivity in terms

of new pedestrian and cycle routes. EWR also state that the increased frequency and speed will lead to quicker journey times even for those who might have to travel to a different station.

3.8 A key merged station and interchange would be at Woburn Sands with the relocation of the station being proposed a short distance (500m) to the west of the current station. All merged stations on the line would benefit from direct connections east between Bedford and Cambridge. Woburn Sands and Ridgmont would have direct services to stations to the west, such as Oxford or Bicester, whilst for other stations a short interchange would be involved.

3.9 Both Concepts 1 and 2 would require the following changes relevant to the Woburn Sands/Wavendon area that would impact on SEMK:

- Changes to the way vehicles and pedestrians cross the railway, replacing level crossings with safer alternatives to enable a faster, more frequent and more reliable train service;
- Improvements to the track including the reinstatement of a second track between Bletchley and Fenny Stratford;
- A range of improvements to Bletchley station, which would become an important hub;
- Required upgrades which could involve the suspension of the existing train service between Bletchley and Bedford during the construction period.

3.10 It is proposed to relocate Woburn Sands station slightly to the west of its current location. The reason for this is that the existing station is perceived to be in a heavily developed area meaning expansion in the current location, to the degree envisaged, would be challenging. The current station is also perceived to have limited facilities with the proposed relocated station better positioned for access to and from SEMK.

Wavendon Parish Council Representations

3.11 Both Concept 1 and 2 will support economic growth which is a key consideration given the growth agenda in Milton Keynes and the need to improve east – west connectivity. However, Concept 1 proposes to retain the existing line which means that journeys will remain slow with few significant benefits. Furthermore, Bow Brickhill and Fenny Stratford would only be served by one train with the local community only

benefitting from the ability to change trains at either Bletchley or Woburn Sands to reach wider destinations.

- 3.12** Wavendon Parish Council considers that the principle of development outlined in Concept 2 is a more sustainable option in planning terms and is therefore supported. Creating new merged stations will allow access to a faster, more frequent service and improved infrastructure in the long term by removing underutilised stations without the need for “passing loops”. Concept 2 would also provide improved stations and facilities. Although some local communities would be disadvantaged by the closure of stations the disadvantages of their closure would be very limited with the benefits far outweighing the disadvantages.
- 3.13** In both concepts Woburn Sands is identified as a key station/interchange providing direct services to Oxford and Cambridge. Although the principles set out in Concept 2 are generally supported the Parish Council do have reservations relating to the implementation of the scheme and the impact on the local community. This is an important factor when considered in relation to the general growth agenda planned to the south of Milton Keynes, particularly in relation to SEMK, and the current levels of disruption and associated adverse impact on the local quality of life.
- 3.14** With less stations the early provision of new infrastructure is critical to enable the merged stations to function at full capacity and accommodate growth. It is vital that this infrastructure links to strategic developments such as SEMK. The provision of significant infrastructure will inevitably create disruption in the short term with greater benefits in the longer term. Wavendon Parish Council request that more detail should be provided in relation to the stated low use of the stations proposed to be closed. Whilst EWR state that they propose to improve the journey options available to the merged stations, Wavendon Parish Council wish to see detailed proposals in this respect and the mitigation proposed. This should be presented as part of the next public consultation exercise as it is crucial to the effective delivery of Concept 2.
- 3.15** Concept 2 will mean that there will be no requirement for trains to overtake with all journeys being the same duration or quicker than at present. The consultation document states that village roads will not become so congested with the focus being on the merged new stations providing purpose built facilities. Given that some users will have further to travel to their nearest station, Wavendon Parish Council would like to see the data/modelling that supports these assumptions as part of the next public consultation exercise.

- 3.16** Concept 2 also proposes that Woburn Sands station be located to the west of the current station enabling better access to the proposed SEMK. Wavendon Parish Council object to the possible relocation of Woburn Sands Railway Station having objected previously in relation to the three movement options presented as part of this consultation. Furthermore, any closure of the Woburn Sands railway crossing will also have devastating consequences, separating two communities which have historic links and ties as well as disrupting access to vital medical, health, educational, social and shopping facilities at Woburn Sands. The Parish Council considers that there is space at the existing Woburn Sands station to extend and utilise the existing infrastructure.
- 3.17** Related to this, but not addressed in the EWR consultation documents, the general concept of a separate transport hub, as detailed in the SEMK SPD, is supported. This will potentially relieve traffic levels on minor roads in the local area, such as Walton Road, Lower End Road and Cranfield Road, and will provide a focus for all modes of transport. As part of the emerging EWR proposals it is important to enable strong connectivity to the proposed transport hub. In this respect there should be a close dialogue between Milton Keynes Council and EWR in relation to the emerging SEMK SPD. These discussions should take place at a detailed level, including local stakeholders, to ensure that the developing EWR master plan properly dovetails with the proposals set out in the SEMK SPD.
- 3.18** Although the long term benefits of Concept 2 outweigh those of Concept 1, Wavendon Parish Council has concerns relating to how the proposals will be brought forward and the impacts on the area in terms of new infrastructure and associated disruption. This process of development must be managed carefully and local Parish Councils consulted at all stages so that robust mitigation is provided from the outset backed up with adequate funding. Wavendon Parish Council, along with other stakeholders, would not be able to support any station closures, as proposed in Concept 2, without these assurances.
- 3.19** We ask that EWR assess the likely impact of the scheme in more detail and, where appropriate, propose mitigation measures to reduce any effects both during construction and once the scheme has been completed. In this respect Wavendon Parish Council welcome the preparation of a Code of Construction Practice which should be made public and request that they are allowed sight of this document at the earliest opportunity.

3.20 Given the likely disruption resulting from EWR, it is important that landowners are properly compensated by reference to the “compensation code” as set out in legislation and supplementary case law. The purpose of the compensation code is to provide a uniform payment of fair compensation and there is generally a right to compensation where land is compulsorily acquired (both permanently and temporarily) and in certain circumstances where no land is taken.

4 Infrastructure Development - Options 1 and 2

4.1 In terms of infrastructure significant changes will need to be made to the existing railway, and some stations, to allow the existing train service and new EWR services to operate together.

4.2 The consultation document states that the platforms at Woburn Sands would need to be extended to accommodate the longer trains that would be used for the fast EWR train service. Permission for this extension has already been granted.

Possible closure of level crossings on Marston Vale line

4.3 The EWR project will increase the number of trains with the closure of more level crossings proposed to ensure a safe and reliable service.

4.4 The consultation document states that the EWR project will result in at least four times as many trains using the Marston Vale line, with trains running faster, making the existing level crossings unworkable. If there were five trains per hour some level crossings would be closed for as much as 40 minutes per hour.

4.5 EWR aim to close level crossings on the Marston Vale Line and replace them with alternative means of access providing between 16 and 19 new bridges over or under the railway together with new links to existing bridges. The aim of this will be to achieve:

- Convenience for users of the local rights of way
- Improved safety for all
- Increased reliability for the services, minimising delays caused by equipment failure.

4.6 To achieve this a number of level crossings, local to Wavendon, are proposed to be closed and replaced with alternative access arrangements.

4.7 EWR have undertaken some initial design development work to identify options for alternative access arrangements which could comprise a new road, footbridge, underpass, or diversion to an alternative crossing. The options will be consulted on again at the next consultation with more information on the options considered as well as the associated environmental and amenity impacts.

4.8 The crossings as detailed below, in the Woburn Sands/Wavendon area, are proposed to be closed. The existing rights of way are situated close together with options put forward to replace the crossings whilst maintaining connectivity across the railway.

- Woodleys Farm private crossing: to the west of Woburn Sands enabling access between two parts of a farm;
- Fisherman's Path footpath: immediately to the west of Woburn Sands where Woburn Sands Footpath No. 2 leads from Bow Brickhill Road (south of the railway) towards Wavendon (north of the railway);
- Woburn Sands road crossing: where the A5130 Station Road/Newport Road crosses the railway;
- Mill Farm footpath: immediately to the east of Woburn Sands where a public footpath (Aspley Guise Footpath No.3) links Vandyke Close, to the north of the railway, to a network of paths leading to Aspley Guise to the south of the railway. This path forms part of the Milton Keynes Boundary Walk;
- Sewage Farm footpath: to the east of Woburn Sands where a public footpath (Aspley Guise footpath No.13) crosses the railway. This footpath connects into the wider footpath network to the south of the railway; to the north of the railway the footpath ends in a field after around 300m.

4.9 The following options have been put forward in relation to Woburn Sands:

Option 1: New road to bypass Woburn Sands and new School Crossing bridge

An area of search is provided on the plan to accommodate a new road that would replace the Woburn Sands crossing to the west of Woburn Sands, connecting Newport Road and Bow Brickhill Road. As part of Option 1 a new bridge would be built over the railway near the existing Woodleys Farm level crossing. The option also involves an opportunity to extend the new road south of Bow Brickhill Road to connect to The Leys south of Woodland Way.

The following crossings would be closed and diverted to cross the railway using the new bridge:

- Woburn Sands (Newport/Station Road)
- Woodleys Farm private crossing
- Fisherman's Path footpath

The crossing would replace the following existing rights of way:

- School Crossing footpath (already closed)
- Mill Farm footpath
- The pedestrian route over Woburn Sands crossing

Sewage Farm crossing (to the east of Mill Farm crossing) and the footpath to the north of the crossing would also be closed.

Option 2: Keeping Woburn Sands crossing with a new Woodleys Farm bridge

This option would retain the existing level crossing on Station Road. The level crossing would be closed and traffic stopped for as much as 40 minutes in an average hour because of the increased frequency of trains. A bridge would not be provided at the site of School Crossing with diversions via Woburn Sands crossing.

Instead a bridge would be provided close to Woodleys Farm to replace that crossing and the public footpath from Fisherman's Path would also be diverted over this bridge. A footbridge with steps would be provided at the site of Mill Farm Crossing.

As with option 1, Sewage Farm crossing and the footpath to the north of the crossing would be closed.

4.10 The following issues are relevant when considering the options:

- A large area of agricultural land would need to be acquired for option 1, but much less for option 2;
- For option 1 an area of land adjacent to the railway would need to be acquired currently forming part of a business;
- Option 1 would provide a new connection that could support future development proposed as part of SEMK;
- Option 1 would likely reduce traffic through Woburn Sands on Newport Road/Station Road and High Street. However, it is likely to increase traffic on Hardwick Road and on The Leys south and east of Woodland Way. If the additional section of new road south of Bow Brickhill is not provided traffic would also increase on the eastern part of Bow Brickhill and the remainder of The Leys north of Woodlands Way;
- An extended option 1 that connects to The Leys could require the acquisition of allotments;

- Option 2 may result in significant transport impacts for Woburn Sands as traffic and pedestrians on Newport Road/Station Road would be delayed by the more frequent closing of the level crossing.

Representations from Wavendon Parish Council

Option 1

4.11 Wavendon Parish Council objects to the proposed closure of Woburn Sands crossing and the creation of a new road to the west of Woburn Sands. As detailed elsewhere in these representations the crossing has an important role in managing traffic flow and allowing connectivity between Wavendon and Woburn Sands and access to the services and facilities provided in Woburn Sands. The construction of a new bypass road to the west of Woburn Sands would also prevent the creation of a linear park, as proposed by Wavendon Parish Council in their representations to the SEMK SPD. This would effectively utilise and link a number of proposed and existing open space areas, including land within SEMK and beyond, to create a new linear park on the south eastern edge of Milton Keynes.

4.12 More specifically the linear park would link with the existing adjoining recreation ground and Caldecotte Brook to the west of SEMK, as well as the Greensands Ridge in the south. This land could also be linked to the former Wavendon Golf Course (the proposed “Wavendon Park”) to the east of the site, and onwards to public rights of way leading over the M1 motorway, effectively creating an extensive linear park network incorporating leisure and recreational opportunities. The proposed extent of this is shown on the attached Plan and is an important and key element of the emerging SEMK proposals given the amount of new development taking place in the locality.

Option 2

4.13 As a concept Option 2 is not supported by Wavendon Parish Council. Although Option 2 proposes to retain the existing level crossing on Station Road the increased frequency of use, as a result of EWR, will mean possible closures of up to 40 minutes per hour which is unacceptable. This will potentially lead to significant adverse traffic impacts throughout Woburn Sands and the wider area, with no provision made for a pedestrian bridge at School Crossing.

- 4.14** Wavendon Parish Council object to the closure of Fisherman's Path which currently provides an important link with the countryside to the north and south of the railway and would provide an important access to the proposed SEMK linear park. The proposals would result in an unacceptable and longer diversion, across Woodley's Farm crossing. If this important footpath is diverted the Parish Council wish to see a footbridge created at Fisherman's Path in addition to the Woodleys Farm crossing proposal.
- 4.15** Given the importance of Woburn Sands level crossing to the local community, and the wish to see it retained and remain open, the Parish Council propose a bridge solution to accommodate road traffic on Newport Road. This could utilise part of the currently disused Pristine Wheels site, to the north of the station, together with a small part of the recreation ground to the south of the railway. Wavendon Parish Council are undertaking further work as to the technical feasibility of the bridge and ask that EWR undertake further detailed modelling work to explore this proposal as part of the next stage of consultation. An indicative plan showing the proposed route of the new bridge is attached.
- 4.16** Furthermore, Wavendon Parish Council considers that a proposed road bridge over the railway at Woodley's Farm could be supported as part of a co-ordinated extension of the H10 as proposed through SEMK.

5 Construction options for the upgrade of the Marston Vale line.

- 5.1** As part of the EWR proposals major improvements are needed over the full length of the railway between Bletchley and Bedford, with parts of the line closed during construction and testing.
- 5.2** The options proposed for this are as follows:

Option 1: a series of short blockades

This could include the use of short blockades of up to 54 hours in length to undertake work. The operational railway would be put back into service at the end of each of these blockades.

This approach is extremely disruptive and generally requires weekend, day and night working to maximise the time available. It is unlikely that the complete upgrade could be carried out in this way due to the complexity and level of works. A piecemeal approach would lead to a longer overall programme and prolong the period over which local residents would be subjected to construction related disruption. It would also mean that services couldn't be introduced until much later.

Option 1 would require the substitution of rail services with road transport for each blockade which may apply every weekend. The pattern of train and replacement bus services would change during the course of the works which could create confusion and deter users.

Option 2: a prolonged blockade

The second option would include a full blockade of the Marston Vale line which would, in effect, make the impacted line available as a safe construction site whilst the upgrade works are undertaken.

This approach would improve overall efficiency through not having to open or close a railway after each short blockade. The majority of works would take place during the day meaning less noise during nights and at weekends.

There would be no rail services for the duration of the works which would require alternative road transport to be provided for the duration of the closure and provide

consistency throughout the works. This would also be the quickest and most efficient way to carry out the constructions works.

Option 3: a mix of long and short blockades

The third option would be to undertake a mix of options 1 and 2 based on the elements of work required. This option could be inefficient and negatively impact on time, cost and construction efficiency. It would also be complicated to plan and deliver because of weather and other third party influences also requiring weekend works.

The times when blockades are applied would require alternative road transport, which would need to be different for each blockade. Weekend work could lead to an overall extension of the programme compared with option 2 and therefore an extension of the period that local residents would be subjected to construction related disruption.

5.3 The following will need to be considered as the options are developed:

- Minimising impact on customers and communities
- The long term benefits to transport users
- Overall affordability, capital costs and operating costs
- Ensuring current freight services can continue to operate
- Alignment with the wider railway strategy and other infrastructure
- Safety risk
- Environmental impacts and opportunities including any impacts on land and property

Representations from Wavendon Parish Council

5.4 Given the high level of construction work taking place in and around Wavendon and Woburn Sands both now and in the future, it is important that services are retained as much as possible during the construction period.



5.5 In this respect the Parish Council would support a prolonged blockade if reliable, effective and alternative modes of travel were established from the outset. This would allow users to understand the travel options from the beginning of the project and enable the construction works to take place in the shortest possible time.

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