

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

04/21

Representations on behalf of Wavendon Parish Council



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1 Introduction

- 1.1 The following 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 As well as providing general commentary on the draft SPD the report also details specific changes that Wavendon Parish Council would like to see made to the draft document by reference to the relevant SPD headings and sections.

2 Introduction - Strategic Context (1.7)

- 2.1** Wavendon Parish Council have consistently objected to the principle of developing the SEMK SUE and have serious concerns about the associated adverse impacts of the proposed development on Wavendon and the surrounding area.
- 2.2** Despite being an allocation in Plan:MK, under Policy SD11, and having been considered by stakeholder groups and the Council's Planning Cabinet Advisory Group (CAG), Wavendon Parish Council believes there to be a number of key issues that currently weigh against the need for, and effective delivery of, SEMK.
- 2.3** By way of background, the village of Wavendon is rich in history comprising an ancient settlement that is mentioned in the Domesday Book. The village also accommodates the remains of a 12th century motte castle site with Roman remains also having been discovered within the village. Wavendon's church dates from the 13th century with the village comprising several old manor houses and farm estates which have all contributed to the fabric and identity of the village for centuries. Many residents have lived in Wavendon for decades enjoying the rural qualities of the area, its character and sense of place.
- 2.4** It should be recognised that many of these qualities have been eroded over the last few years due to the scale of new development and associated encroachment. This has had an adverse impact on the high quality of life associated with the Parish and the attractive surrounding environment. A very significant issue has been the increase in traffic generation along Newport Road, Walton Road, Lower End Road and Cranfield Road resulting in both noise and air pollution.
- 2.5** The noise and lorry traffic generated by new developments, to the north east and north west of the Parish, has been a constant backdrop to Parish life for years and will be for many years to come. Everyday life for Wavendon residents has become at best difficult, and at worst unbearable, resulting in significant mental stress for many. It is difficult to understate the loss of amenity and quality of life that result from living with constant noise and disruption. These factors and the cumulative impact of new development, should be given greater consideration as part of this consultation, particularly in relation to the proposed extension of H10 and the impact of further development that may eventually take place further east, beyond Newport Road and the A421.

- 2.6** Given the adverse impact of significant new development, the current uncertainties regarding the East West rail line and the associated impact on the SEMK masterplan, Wavendon Parish Council wish to see the SEMK delayed until further consultations have been undertaken, 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.
- 2.7** 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, 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.

East West Rail Line (1.7.4 – 1.7.8)

- 2.8** As detailed in the Foreword to the draft SPD, 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.
- 2.9** The East West Rail Company (EWR) are currently undertaking a consultation exercise, between 31 March and 9 June 2021, into a range of formative proposals relating to infrastructure, route alignments, stations and level crossings. It is understood that this will be followed by a statutory consultation prior to the submission of a new Development Consent Order (DCO) in late 2022. Wavendon Parish Council will be submitting representations in relation to this consultation process.
- 2.10** As detailed proposals will not emerge quickly we note that 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.
- 2.11** Notwithstanding the development of alternative movement scenarios that could potentially provide benefits to the wider area, 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. As part of any proposal Wavendon Parish Council consider that a railway crossing must be maintained as part of the development and kept open. Paragraph 1.7.7 refers to the 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.

- 2.12** The adoption of the SPD should therefore 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. It is vitally important that the final SPD has an agreed logical structure, accurately showing how the various elements of the concept plan will be developed.
- 2.13** In order to properly implement the SPD it is important for stakeholders to be able to engage with developers/landowners at an early stage, following adoption, to effectively influence the provision of local infrastructure. Further discussions with the Council to establish detail on relevant developers is requested following this consultation.

Oxford Cambridge Expressway (1.7.9 – 1.7.10)

- 2.14** Following a recent Government announcement, on 18th March 2021, the Oxford Cambridge Expressway has now been cancelled with the Government promising to work on more targeted, localised road improvements alongside East West Rail.

Milton Keynes East

- 2.15** The Milton Keynes East Development Framework was adopted by Milton Keynes Council on 10 March 2020 reflecting guidance contained in Policy SD5 of Plan:MK. The mixed use development envisaged by this allocation is significant including 5,000 dwellings. Related to this development comes Government funding for new infrastructure, including the M1 crossing, that will enable the expansion to take place.

- 2.16** Given the relatively advanced status of Milton Keynes East and associated funding for new infrastructure, Wavendon Parish Council considers that Milton Keynes Council does not currently require the housing numbers that will be provided by SEMK.
- 2.17** This, combined with the uncertainty over the East/West rail link, are very valid reasons for suspending the SEMK consultation to allow these issues to be resolved.

3 Development Framework - Landscape and Open Space Strategy (4.2)

- 3.1** In terms of buffer areas and landscaping, Policy SD11 states that, in relation to the SEMK SUE, *“development of the site will be required to 3) incorporate buffer areas, structural landscaping and strategic green infrastructure within the site to prevent coalescence with Woburn Sands and Bow Brickhill, respect and reinforce the distinct character of Wavendon, Woburn Sands and Bow Brickhill, ensure ecological connectivity and mitigate any harm caused to the Brickhills area and wider landscape character”*.
- 3.2** Paragraph 4.2.10 of the draft SPD states that, in relation to Woburn Sands, Wavendon and Bow Brickhill villages, multi functional buffers will be provided along edges to prevent coalescence and retain the character and integrity of the existing settlements. Wavendon Parish Council considers that the risk of coalescence between Wavendon and Woburn Sands has reached a critical stage; a point that should have been addressed more thoroughly in the context of Policy SD11. There is now an opportunity to address this as part of the SPD by creating a more robust buffer between the settlements.
- 3.3** The Milton Keynes Landscape Character Assessment sets out a number of landscape guidelines relating to new development which are noted in paragraph 2.5, Landscape Character, of the draft SPD. These guidelines include ensuring *“that open views across the landscape character area to the Brickhill Greensand Ridge are retained”*. It is important to note, in the context of the draft SPD, that views from the edge of the village to the Greensand Ridge are of an exceptional quality and should be secured via a substantial buffer to the south of the village.
- 3.4** In addition, para 2.12 of the SPD document identifies the southern boundary of the Wavendon recreation ground as having a *“sensitive edge”* and as such built development towards this edge should respect the character of Wavendon and *“views south toward Greensand Ridge should be exploited through the layout of the site”*. The views towards Wavendon, and in particular the 13th Century church, are noted as being of importance in the SPD and should not be screened by development.
- 3.5** The draft Development Framework Plan, at Figure 4.10, currently proposes a robust landscape buffer to the south west of SEMK immediately to the north of Bow Brickhill

village. Similarly, the buffer to the east of the proposed development is substantial, adjacent to Woburn Sands, incorporating proposed playing fields and a large pond. Both Woburn Sands and Bow Brickhill, like Wavendon, are identified in the SPD as having “sensitive edges”; however, the buffers proposed on the concept plan between Wavendon and the proposed development are narrow and less robust accommodating a number of uses within a relatively small and compact area. Wavendon Parish Council considers that the current buffer proposal is contrary to relevant planning policy advice and will not provide an effective transition, in landscape terms, between SEMK and Wavendon.

- 3.6** As a concept Wavendon Parish Council welcomes the inclusion of multi functional buffer zones; however, the current buffer as proposed to the south of Wavendon, is too narrow. Furthermore, the buffer area lies immediately adjacent to an area proposed to accommodate a potential Gypsy and Traveller site, all set within a relatively concentrated area. It is important that a significant buffer exists between new development and Wavendon village to ensure the retention of Wavendon’s unique and historical identity. In this respect Wavendon Parish Council wish to see the identity of the old village retained and clearly separated from new development. It is essential that the established character and boundaries of the existing community are clearly defined and are not further diluted by new development. A larger buffer will greatly contribute to achieving this.
- 3.7** Wavendon Parish Council would prefer the buffer zone to be at least 100 metres at its narrowest point to enable the effective separation between planned and established development and to allow key views towards Wavendon and Browns Wood. In terms of the proposed residential areas abutting Wavendon, the Parish Council would like to see lower densities proposed on the northern edge of the SEMK site to reflect those in Wavendon village. This approach is evident in relation to the southern boundary of SEMK which shares similar characteristics to Wavendon.
- 3.8** From feedback received at the recent SEMK Q and A sessions we understand there is reluctance, by planning officers, to extend the proposed buffer at Wavendon given the overall requirement to accommodate 3,000 dwellings at appropriate densities. Wavendon Parish Council consider that, given the generous size of other proposed buffers and associated landscaping throughout SEMK, there is adequate space to accommodate more development in other locations around the site, allowing for a larger buffer adjacent to Wavendon. Any wider assessment of buffer zones should be

properly planned, ensuring that existing landscape features are retained, such as trees and hedgerows, in accordance with the Hedgerow Regulations 1997.

- 3.9** It is important for the Council to adopt such an approach given the role of buffer zones in effectively determining the size of new development parcels, enhancing residential amenity and properly integrating development with the surrounding area. Furthermore, the role of attractive open space and associated biodiversity has a beneficial impact on our mental wellbeing, as illustrated during the current pandemic. This is an important consideration in relation to the SEMK SPD. The provision of well planned development and open space throughout the development area has a key role to play in the health and wellbeing of local residents and should not be ignored.
- 3.10** Notwithstanding the value of the existing recreation ground and any potential extension, as an important component of a potential new linear park, Wavendon Parish Council does not wish to see it included as part of an enlarged buffer zone.

Linear Park (4.2)

- 3.11** To make the proposed buffer more robust, as part of an improved network of open spaces, Wavendon Parish Council considers there is scope for the buffer zone to be incorporated into a wider linear park, linking 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 also showing the proposed extension to the recreation ground.
- 3.12** Such a proposal would help to address the considerable shortfall in current playing field provision in the Wavendon and Woburn Sands area. By way of context, although the Milton Keynes 2019 Playing Pitch Survey states there is no deficit in playing pitch supply, this does not take account of the fact that Wavendon and Woburn Football Club is actually affiliated to the Bedfordshire Football Association. Current trends point towards 80% of club members coming from Milton Keynes households with Central Bedfordshire providing 57% of the Club’s pitch capacity. The Club is by far the largest provider of grass roots football in South East Milton Keynes but is not included in the Milton Keynes figures. Woburn and Wavendon FC currently

has 35 children on its waiting list and could have set up at least an additional eight teams. A key barrier to satisfying this demand has been the lack of available winter floodlit facilities and weekend grass playing surfaces. The current pattern of enquiries is even more slanted towards MK residents. There is therefore, in reality, a major issue with the lack of playing field provision in the local area.

- 3.13** Furthermore, Wavendon Parish Council considers that, over time, the supply of playing field provision has not historically satisfied demand, a trend that is likely to continue. In reality the playing fields provided as part of the Wavendon Heights SLA will only serve to satisfy existing demand. Furthermore, the demand generated from other developments being built out in the Wavendon area will create extra demand that will only be partly addressed by playing fields as part of SEMK. Once SEMK is completed there will be further demand that will need to be satisfied. Paragraph 4.2.28 of the draft SPD identifies Figure 4.1 as showing indicative locations for playing fields with two options shown within the other proposed open space buffers, each comprising 4 pitches with an associated community pavilion. We understand that the identified option adjacent to Bow Brickhill has drainage constraints and may not be an appropriate location for playing pitches.
- 3.14** The SPD goes onto state that SEMK is required to only provide playing fields to meet the needs of residents within the allocation acknowledging that provision could serve a deficit in, for example, Woburn Sands. As addressed above Wavendon Parish Council considers that this deficit is very significant and under played in the SPD.
- 3.15** Given the unsuitability of the proposed buffer, south of Wavendon, to accommodate a G and T site and the need to provide for the wider local deficit of playing fields in Wavendon and Woburn Sands, Wavendon Parish Council wish to see additional playing field provision within an expanded buffer zone, adjacent to the existing recreation ground, to the south of Wavendon. This would complement existing provision and create a focus for playing field provision, offering wider benefits in terms of the operational management of the facility. It would also provide a better relationship, in land use and amenity terms, with the proposed and existing residential development. This could also provide strong links with any future linear park being accessible by both pedestrians and cyclists.
- 3.16** Given the extent and importance of the proposed buffers, Wavendon Parish Council supports the involvement of the Parks Trust and would wish to see such a linear park

managed by them actively encouraging leisure and recreation activities within the wider area.

- 3.17** This approach would reinforce and enlarge the buffer zone around the existing Wavendon Church End community; it would help to protect outstanding and long established vistas towards Wavendon, Bow Brickhill, Woburn Sands and the Greensand Ridge and would provide increased parking/vehicle access to Wavendon Recreation Ground, from the south, thereby avoiding the village.

Dual use of school facilities (4.2.29)

- 3.18** Paragraph 4.2.29 of the SPD refers to the encouragement of the dual use of school facilities for the community. Although this is generally supported by Wavendon Parish Council the general reference to dual use is not detailed enough. The Parish Council wish to see additional text inserted at paragraph 4.2.29 to the effect that Community Access Agreements should be a key part of delivering future education sites and put in place at least 12 months before a school site opens. Such agreements should include an indication of how community access to the site will work and expectations for the use of equipment and its storage.

4 Development Framework - Movement Framework (4.3)

- 4.1** 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.
- 4.2** 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)

- 4.3** 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. We understand that Phase 1 modelling studies were undertaken in 2018 to consider traffic flows, principally in Woburn Sands, but that Phase 2 of the study which will consider the impact of traffic on local roads, including those in Wavendon, has yet to be completed. 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.
- 4.4** 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.

- 4.5** 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 Local Plan Policy CT1 – Sustainable Transport Network, which seeks to promote a safe, efficient and convenient transport system with improved access to key locations and services, by all modes of transport, ensuring good integration between transport modes. Criteria 6 of the policy advises continuing engagement with relevant stakeholders along the East – West Rail Line to identify operational benefits.
- 4.6** Furthermore, the uncertainty regarding the movement strategy is contrary to policy CT2 – Movement and Access, as the current strategies do not adequately integrate into the existing sustainable transport networks or promote safe, suitable and convenient access. Unless the movement strategy is fixed it is not possible to provide developers with the certainty required regarding connectivity with adjoining grid squares, location of railway crossings, links to adjoining areas and the safeguarding of infrastructure. A workable master plan effectively evolves from an effective and well informed transport and movement strategy.
- 4.7** The lack of a movement strategy also creates uncertainty for existing residents in accessing local services; for example, should the level crossing on Newport Road be closed for long periods, or even permanently, residents in Wavendon Parish will find it difficult, if not impossible, to access vital services in Woburn Sands.

Extension to H10 (4.3.8)

- 4.8** All three movement scenarios, detailed in the draft SPD, promote the extension of H10 and a new roundabout providing the main access into and through the site. All three options show potential future connectivity towards Newport Road through potential Mass Rapid Transport and Redway/bus lane connections. The options also propose a potential relocated train station.
- 4.9** The proposed extension of H10 potentially has major implications for Wavendon, and the wider area, and is a key element in the delivery of SEMK as currently detailed in the draft SPD. Wavendon Parish Council currently has a number of reservations relating to the current H10 extension proposal, particularly in relation to connectivity with the busy Newport Road, and beyond, and would like to reserve its position until a robust Strategic Transport Assessment has been undertaken. The brief for this

work should be agreed with the Parish Council, and other local stakeholders, and should be undertaken by an independent consultant assessing, in detail, the impact of the proposed H10 extension on the local area.

- 4.10** Given the many unanswered questions relating to the proposed extension to H10, any indicative arrow, on the SPD plans, showing potential future directions of travel from H10 across Newport Road and beyond, should be removed. It is premature, despite broad references being made in the MK Strategy for 2050, to consider the implications of a Mass Rapid Transit (MRT) system at this stage. Wavendon Parish Council considers there to be no opportunity for a major road, beyond Newport Road to the east, without significant land take, demolition and associated disruption particularly now that the indicative route of the H10 extension is prejudiced by the recent grant of planning permission for housing on the Frost's northern landscaping site.

Impact on Adjoining Roads

- 4.11** Furthermore, Wavendon Parish Council would like the impact of the SEMK proposals on Walton Road, Lower End Road and Cranfield Road to be assessed in more detail, as part of the above mentioned Strategic Transport Assessment, with remedial measures put in place before the SPD framework is approved. Actions should be taken to mitigate against any further increases in the volume of traffic, which has increased in recent years, resulting in rat running and associated harm to the local road network. Wavendon Parish Council therefore request that, as part of this work, there is a commitment to implement the study into the, already approved in principle, Low Traffic Neighbourhood Trial (LTN) in Walton Road prior to any development taking place and that, furthermore, Newport Road be a fixed boundary to any further development.
- 4.12** Wavendon's already busy roads (Newport, Walton, Lower End and Cranfield Roads) have seen a big increase in traffic volume and are at risk of becoming grid locked with the current new developments in the area; the SEMK expansion will make this worse. Permanent or frequent closures of the railway crossing at Woburn Sands will only exacerbate the situation.
- 4.13** With recent developments in and around Wavendon not only has there been a big increase in the volume of traffic on village roads but also a change in the type of traffic. Much bigger vehicles, including vans, construction traffic on roads, which are

not designed to accommodate that type of vehicle, are much more common on village roads. Although Newport Road has a weight limit of 7.5 tonnes, larger lorries frequently use the road on through routes. Other than Newport Road none of the local roads are wide enough to allow for the passage of two wide vehicles, alongside cyclists and pedestrians. With the addition of new traffic lights and associated feeder roads on to Newport Road, rat running has become more of an attractive option via Walton Road and Lower End Road. Walton Road has a particularly dangerous blind bend within the village, unsuitable for anything more than local village traffic.

- 4.14** In addition Walton Road, in particular, is used by many school children from Woburn Sands who access Walton High/Wavendon Gate schools by cycle. Walton Road is also part of National Cycle Route 51, but currently has no safety measures which are designed to protect cyclists, such as dedicated lanes nor even road markings.
- 4.15** Without careful consideration of future traffic flows from new developments, including the SEMK area, and appropriate measures to alleviate pressures on local roads, through traffic on these narrow village routes will be overwhelming and dangerous. This, combined with a further deterioration in the quality of air from road pollution, increasing road noise, vibration damage to many historic houses and road drainage (which is already unfit for purpose) will contribute to a downward spiral in living standards for residents of the Parish.

Woburn Sands Railway Station/Transport Hub

- 4.16** Wavendon Parish Council object to the possible relocation of Woburn Sands Railway Station which is featured in the three movement options presented. Closure of the railway crossing will also have other 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.
- 4.17** The Parish Council considers that there is space at the existing station to extend, if required, utilising the existing infrastructure. The general concept of a transport hub is, however, supported. This will potentially relieve traffic levels on minor roads, such as Walton Road, Lower End Road and Cranfield Road, and will provide a focus for all modes of transport. As part of the final master plan it is important to create strong connectivity to the transport hub in terms of existing and proposed pedestrian and cycle links.

Internal Transport Network

- 4.18** Wavendon Parish Council would like to see the existing public rights of way, situated across the development site, retained and enhanced where possible. The Parish Council supports the idea of a network of Redways, footpaths and bridleways planned throughout the site providing internal connectivity and connections to adjacent settlements on the fringes of SEMK.
- 4.19** Wavendon Parish Council wishes to see comprehensive walking and cycling connectivity between Wavendon village (Church End), the wider Parish and Woburn Sands to enable access to local services. At present the Redway between Wavendon and Woburn Sands, along Newport Road, is dangerous and inadequate and should be improved as part of the proposals.
- 4.20** The Parish Council also wish to see enhanced east/west connectivity via walking and cycle routes to enable SEMK to be cycle and pedestrian mode dominated, thus reducing the dominance of the car. As part of the wider development Wavendon Parish Council would like to see SEMK connect with a new linear park, to the south of Wavendon village, greatly increasing leisure/recreation opportunities, reducing car use and encouraging cycling and walking opportunities. This would help to assimilate what is a significant amount of new development into the landscape providing many benefits for the local community. (See attached Plan)
- 4.21** It is important that enforceable speed restrictions are also put in place throughout the proposed development, to control the speed of traffic throughout SEMK and its transport links with the surrounding area. The Parish Council, in line with initiatives already being taken by Milton Keynes Council, would like to see any H10 extension road limited to a maximum speed of 40 mph throughout its length, in order to minimise the impact of noise and pollution for Parish residents.
- 4.22** To help reduce the impact of these threats to the local community Wavendon Parish Council request that the following measures be implemented:
- i) Complete the outstanding second phase of the Local Transport Strategy to assess the impact of the SEMK proposals on Newport Road, Walton Road, Lower End Road and Cranfield Road and take appropriate steps to mitigate against increased traffic flows and ameliorate any adverse consequences resulting from SEMK and other new developments. The studies must be undertaken in conjunction

with the formulation of plans to upgrade the East/West rail line before the SEMK framework is approved.

ii) Implement the Low Traffic Neighbourhood (LTN) pilot scheme on Walton Road to calm and reduce the existing traffic and the expected traffic from new developments prior to the approval of any SEMK development.

iii) Introduce an enforced speed limit of 30mph on Newport Road, Lower End Road and Cranfield Road. Ideally “20 is plenty” should be adopted throughout the remaining road network together with enforcement of the speed limits.

iv) Implement the already agreed closure of Cross End to through traffic.

v) Maintain the railway crossing and access to the vital amenities at Woburn Sands. If waiting times at the crossing lengthen residents should have the choice of whether to accept this or whether to divert via the new crossing.

vi) Improve existing footpaths and cycleways between the local communities and establish networks of paths for cyclists and pedestrians to support and promote active travel throughout Wavendon, as well as the neighbouring areas, which offer a range of local amenities.

5 Development Framework – Travellers Sites (4.4.6)

- 5.1** Policy SD11 states that the site will be required to accommodate 7 pitches for Gypsies and Travellers (G and T's) as part of SEMK. In relation to Wavendon one site is suggested to the north of SEMK, abutting Wavendon Recreation Ground. Wavendon Parish Council strongly objects to this potential location.
- 5.2** Specifically national planning policy directs that local planning authorities should determine pitch targets for gypsies and travellers which address the likely permanent and transit site accommodation needs of travellers in their area. As part of this process local planning authorities are asked to consider the production of joint development plans that set targets on a cross authority basis, to provide more flexibility in identifying sites; to relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population size and density; to respect the interests of the settled community and to protect local amenity and the environment.
- 5.3** Whilst there is no law which requires the inclusion of traveller sites in Local Plans, the policy is written in such a way that the Local Plan should not be approved by a Planning Inspector if the local planning authority had not created an evidence base that considered what traveller sites were needed in the local area.
- 5.4** To inform the evidence base for Plan:MK the Council produced the Milton Keynes Gypsy and Traveller Accommodation Assessment (GTAA) prepared to provide an assessment of the current and future need for Gypsy and Traveller accommodation within the Borough. We note that, following on from this work, Plan:MK is required to accommodate a further 19 pitches up to 2031 with Milton Keynes having a total of 12 further pitches allocated but yet to be provided, with 7 pitches required over the plan period as part of SEMK.
- 5.5** Wavendon Parish Council considers there to be a lack of evidence to justify the need for 19 pitches. The GTAA assessment was, we understand, undertaken by a market research company based on interviews with the traveller community who, unsurprisingly, put forward a requirement to more than double the existing G and T site provision within a 10 year timeframe. The assessment identifies that of the 19 additional pitches required, only 5 were actually to satisfy the needs of those who qualify as travellers, using the Government's definition; 13 were for those who did not satisfy the definition and one for a family whose status was listed as unknown.

Wavendon Parish Council therefore considers that further, more robust, evidence is required to justify the requirement.

- 5.6** As identified in Milton Keynes Council's response to the Inspector's questions for Examination Hearings, (Stage Two, Matter 8: Policies for Managing Development, in the Examination into Plan: MK (August 2018) the SEMK development, in terms of G and T provision, is identified as presenting the greatest level of risk due to the uncertainties over the delivery and timing of the SEMK allocation. Other allocated G and T sites are identified as being of sufficient capacity to account for the large majority of need required within the first 10 years of the Plan, as identified in the GTAA. The Council's response states that if the SEMK SUE is delayed in terms of delivery, this should not adversely impact on the provision of the required G and T pitches across the Borough during the plan period.
- 5.7** The response goes onto state that, given the specific location of sites within the SUE are not yet agreed, through the preparation of the development framework, the G and T pitches should be located so as to ensure site conditions and constraints do not pose a risk to delivery at the appropriate time to meet required needs. This logic appears to be at odds with paragraph 5.2.5 of the SPD which states that "*A commitment is required to deliver the G and T site before the completion of phase 1 of the residential development*". It is clear that the approach to, and delivery of G and T sites, needs to be better thought through by Milton Keynes Council.
- 5.8** G and T sites have typically been located within proposed strategic site allocations to allow for the Traveller communities common preference to reside separately from the settled community. In the case of SEMK there is no evidence that the Traveller community have been consulted regarding the potential G and T site locations or that their proposed siting has been properly thought through. Wavendon Parish Council considers that the proposed locations of G and T sites need to be properly assessed, as part of a consultation process, including both the settled and traveller communities, and not randomly distributed around strategic allocations such as SEMK. Wavendon Parish Council also wish to see details provided as to how existing sites are run and the implications for the local community.
- 5.9** Criteria F of Policy HN11 states that new permanent Gypsy and Traveller Sites will be permitted provided (inter alia):

- a genuine need for the site or extension has been demonstrated;
- the site is reasonably accessible to shops, schools, health and other local services and community facilities;
- sites must be well related to the primary road network and have adequate road access;
- the site is compatible with neighbouring land uses, and minimises impact on adjacent uses, built form and landscape character;
- there is space within the site for the provision of essential facilities, including parking and landscaping;
- the development complies with Plan:MK, Policies NE1-6;
- the site would not affect a site of nature conservation interest.

5.10 The policy goes onto state that any net loss of authorised permanent sites or a reduction in the number of authorised pitches for Gypsies and Travellers will only be permitted where it can be robustly demonstrated that the overall need for sites or pitches/plots no longer exists.

5.11 Whilst Wavendon Parish Council recognise the need to properly accommodate G and T sites they wish to strongly object to the designation of a Gypsy and Traveller site adjacent to Wavendon Recreation Ground, for the following key reasons:

- given the likely delay in bringing forward SEMK, due to uncertainties regarding the rail link, it is inevitable that the need for and effective delivery of G and T site provision at SEMK will have to be re assessed having regard to changes in demand and updated local provision;
- the area proposed to accommodate the buffer to the north is too small to properly accommodate a Gypsy and Traveller site and will create a cramped intrusive environment;
- the land identified for G and T provision, adjacent to Wavendon, also slopes considerably and would represent a site constraint contrary to best practice;
- notwithstanding the potential G and T site, the proposed buffer is already relatively narrow in the area proposed and will not provide a robust boundary;
- the proposed site would need a new road access and associated drainage provision, which would include the requirement for a grade separated crossing for Phoebe Lane.
- the proposed location will compromise attractive views from what is a high point looking towards Greensand Ridge and towards the church;

- the proposed site lies adjacent to a well used sports ground which is much valued by the local community. A G and T site located immediately adjacent to the ground will compromise the operation of the sports ground and is not considered to be a good relationship in land use terms;
- the proposed G and T site is situated close to a children's day nursery and other related facilities used by young people;
- the proposed G and T site is located near to a strategic gas pipeline which runs close to the southern boundary of the playing fields making the site an inappropriate location.

5.12 Wavendon Parish Council considers that the intended location for the G and T site is contrary to Local Plan Policy HN11. The proposed site is not accessible to shops, schools, health and other local services and community facilities, being isolated and remote.

5.13 The location of the site would also be removed from the primary road network, despite the proposed extension of H10, requiring access through a relatively compact residential area. Furthermore, the SPD advises at Page 52, that there should be no direct access onto a Grid Road. This guidance therefore makes the Wavendon G and T site and other proposed development in the locality unsuitable, as there would be no other possible road access.

5.14 Furthermore, the proposed G and T site is not compatible with neighbouring land uses, which is a requirement of Policy HN11, and will impact adversely on the adjacent recreational use and open landscape character of the buffer area.

5.15 In addition, with the proposed Gypsy and Traveller sites within this location effectively the size of two football pitches (approximately 1.5 ha), there will be very little space to properly accommodate essential elements such as parking and landscaping. Wavendon Parish Council estimate that accommodating a G and T site in this location will result in a buffer of only 50 metres which is considered to be too narrow; a 100 metre buffer would be more appropriate linking, potentially, with a wider linear park.

5.16 Notwithstanding the potential adverse impact of the proposed G and T site on the local environment and biodiversity, as detailed in Local Plan Policies NE1 – NE3, Wavendon Parish Council considers that the proposed site, and resulting concentration of uses within the designated area, will have an adverse impact on

existing and proposed green infrastructure and landscape character contrary to Local Plan Policies NE4 and NE5.

5.17 Wavendon Parish Council therefore request that the proposed G and T site to the south of Wavendon be removed from the master plan. The other two sites identified do perform better in terms of satisfying the requirements of Policy HN11 being flat, accessible, more sustainable and better connected to shops and local facilities. The Parish Council request that, when provision needs to be made, other sites are considered ahead of the site adjacent to Wavendon which, we consider, is far more suitable for playing field use (as detailed elsewhere in the representations).

5.18 The Parish Council note that Milton Keynes Council have previously removed proposed G and T sites for good planning reasons and ask that this approach be applied to SEMK. For example, the G and T option proposed to the west of Woburn Sands, also included in the proposed buffer area, was removed from the list of options because it was located too close to proposed leisure facilities and was unlikely to encourage community support.

6 Development Framework – Community Hub (4.4)

- 6.1** We note that a community hub (4.4.8) is proposed to be located to the south of the railway line forming the heart of the community. Wavendon Parish Council fully supports the creation of a centrally located Hub but would wish to see the uses proposed as part of the Hub support only the needs of the local community so as not to compete with other nearby facilities. Wavendon accommodates a range of facilities which should not be impacted by competition from new elements in the SEMK development area. Any new facilities should complement those that currently exist and should be phased accordingly.
- 6.2** Wavendon Parish Council supports paragraph 4.4.4 of the draft SPD which highlights the criteria in Plan:MK Policy HN3, and the expectation that the development will be expected to provide an element of supported or specialist housing to help contribute towards meeting the needs of older persons and households with specific needs. In terms of detailed design Wavendon Parish Council considers that there is an opportunity to provide more bungalows for the elderly population, especially in areas where building heights and associated views are a potential development constraint; for example, on the high ground next to Wavendon village.
- 6.3** Wavendon Parish Council also wish to see a specific reference made, within the SPD, to the benefits of self build housing at paragraph 4.4.4.

7 Development Framework - Education (4.4)

7.1 Wavendon Parish Council welcomes the additional primary and secondary school provision that SEMK will provide (4.4.13 – 4.4.16). However, the size and development of the new schools need to be given careful consideration having regard to the existing education offer in adjacent settlements. Furthermore, a number of new pupils will inevitably come from outside SEMK generating additional traffic and highway safety issues. It is important that this new provision is therefore properly phased and managed.

8 Development Framework - Retail/Local Centre (4.4)

- 8.1** The creation of two Local Centres (4.4.17 – 4.4.18) is generally supported given the scale of SEMK. However, in relation to the Local Centre closest to Woburn Sands consideration should be given to the scale of retail provision in that location and the potential impact on the vitality and viability of the established Woburn Sands High Street. This can be done by controlling use classes in the SEMK Local Centres. Furthermore, the design of the uses proposed should be of the highest quality given the close relationship of buildings in the Local Centre. There is a danger, if not properly planned, that the area will accommodate too many uses in a relatively compact area which will impact adversely on the overall design creating a cramped, over developed environment.

Healthcare Provision

- 8.2** In terms of health centre provision, Wavendon Parish Council considers that there is currently insufficient capacity in the local area to cope with the existing and planned population growth that will result from SEMK. As part of the SEMK offer it is vital that significant additional healthcare provision is made and that a coordinated approach takes place in consultation with the existing, at capacity, medical and dental practices in Woburn Sands and Walnut Tree.

9 Development Framework - Sustainability

Sustainable Construction (4.6.2 – 4.6.15)

9.1 Wavendon Parish Council considers that the development proposed at SEMK

presents an opportunity to showcase cutting edge design technology and promote the Government's ambitions for improving design and sustainability in construction. The detail contained in Local Plan policy and the finalised SPD, relating to sustainability, is supported by Wavendon Parish Council but will need to be reflected and applied in the assessment of detailed planning applications relating to SEMK as they are submitted.

9.2 Wavendon Parish Council would particularly like to see designs come forward which involve high standards of insulation and alternative forms of heating. The SPD should also emphasise how the development and future planning applications at SEMK, should address climate change issues in particular flooding, drainage and air pollution.

Telecommunications and ICT Network (4.6.15)

9.3 Given the importance of broadband in all aspects of our lives, Wavendon Parish Council requests that all new development, at SEMK, should have access to high speed, future proofed broadband and that this connectivity be extended to the existing areas of the Parish.

