



South East MK
Planning, Strategic Transport and Placemaking
Civic, 1 Saxon Gate East,
Milton Keynes
MK9 3EJ

12th April 2022

Dear Sir/Madam,

Application no: 22/00524/OUTEIS

Proposal: Outline application (matters of principle access to be considered with matters of layout, scale, appearance and landscaping reserved) for mixed-use urban extension comprising residential development, secondary and primary schools, local centre (including retail, commercial and community uses), landscaped green infrastructure and public open space, access roads and associated highways improvements, surface water drainage and associated infrastructure works.

At: Land Forming Part South East Milton Keynes Strategic Urban Extension South of Milton Keynes North of Bow Brickhill, North of Bow Brickhill Road And Woburn Sands Road Milton Keynes

1. The Woburn Sands Town Council recommends that Planning Application 22/00524/OUTEIS be refused on the grounds that it does not comply with the Supplementary Planning Document (SPD) for SEMK approved by Milton Keynes Council in January 2022. Although the application contains frequent reference to compliance with the SPD para 5.61 of the Planning Statement states “the SDP ... is intended to guide but not to fix the future development and master planning of the site”. This demonstrates a fundamental misunderstanding of the SPD by the applicant.
2. Furthermore not only does this application relate only to part of the SEMK area but there are significant gaps in the application’s coverage of the site where presumably ownership is in different hands. It is essential that a comprehensive plan be prepared by all the developers interested in SEMK in order to ensure that the area is developed in a logical and consistent manner as set out in the SPD. Housing density, transport links, and the relationship between the housing areas and the supporting facilities must be properly planned across SEMK as a whole, as must the linkages into the adjacent areas. This application cannot be considered in isolation and must therefore be refused.



3. It should be noted that about two thirds of the land in SEMK is in the parish of Woburn Sands with small parcels in the parishes of Bow Brickhill and Wavendon. The relevant policy principles in the adopted Woburn Sands Neighbourhood Plan (particularly those relating to sustainability) should therefore be reflected in the SEMK development.

SEMK Development Philosophy

4. The SEMK site was identified in PlanMK as a development site under the title of a Strategic Urban Extension. It was then envisaged as an extension to the existing urban footprint of Milton Keynes. In subsequent discussions it was redefined as South East Milton Keynes; this redefinition reflected the fact that the SEMK site represents the final South East boundary of Milton Keynes.
5. The site also adjoins three long established parishes (Woburn Sands, Bow Brickhill, and Wavendon) with their own specific communities and identities.
6. In view of the nature of the site MKC, from the outset, involved the above Town/Parish Councils and the Walton Community Council (also adjoining SEMK) in the discussion of the SPD.
7. The SPD sets out the following Vision for the SEMK site (para 3.2):

SEMK will become a thriving new community set within a lush landscape with significant planting of forest scale trees that give the sense of extending the Brickhill Woods into the Milton Keynes urban area.

It will be a welcoming and sensitively designed environment – both be a high quality example of modern town planning that builds on the proud and successful legacy of innovation in Milton Keynes whilst also respecting the distinct character of Wavendon, Woburn Sands, and Bow Brickhill.

8. In developing this Vision a number of important principles were agreed:
 - The main access to SEMK should be from the North
 - The character of the existing settlements (particularly Woburn Sands and Bow Brickhill) should be preserved and, where possible, enhanced. Appropriate buffer areas should be provided.
 - A comprehensive transport strategy needed to be developed to ensure the continued health of the existing communities and to take account of the development of East West Rail. It should also take account of the long term objectives of the MK Transport Policy



- The community facilities (including educational, medical, and leisure facilities) to be provided in SEMK should complement the existing facilities and those being developed in adjacent areas of Milton Keynes.
- Housing density should be higher at the Northern end of the site, reducing towards the Southern boundary as it blends into the countryside of the Greensand Ridge

9. This application does not meet this Vision and should therefore be refused.

Transport

10. The application proposes five access points to the site set out in para 5.17 of the Design & Access Statement (DAS); no access points are proposed to the North of their site. Para 1.2 of the DAS states that “all matters are reserved except for means of access to the site”. This implies that the application cannot proceed to the detailed stage unless approval is given for these access points.
11. Limited reference in the application is made to East West Rail; final agreement over internal access between the applicant’s site and the north of SEMK can only take place once EWR have finalised their proposals for the line.
12. These access points have, in effect, been prepared without reference to the development of SEMK as a whole. The SPD makes clear that the primary orientation of SEMK should be to the North and via Brickhill Street. There should be limited access to Bow Brickhill Road since the SPD recognises that unrestricted traffic access into Woburn Sands should not be permitted given the nature of The Leys, Hardwick Road, and Theydon Avenue.
13. The internal transport proposals in the applications cannot be considered since they have not been developed in conjunction with the other SEMK developers.
14. The transport proposals in the application cannot be approved until such time as the overall development of SEMK becomes clearer.

Density and Housing

15. The overall housing target for SEMK as a whole is 3,000 dwellings; the total area of SEMK is 200 hectares which gives a gross figure of 15 dwellings per hectare. The SPD also suggests that density should reduce towards the Southern boundary of the site (para 3.3.7 of the SPD):

“... with lower densities towards the edges of existing development notably Bow Brickhill Road, to complement the character of the neighbouring area. Higher densities should be provided in areas with strong accessibility to public transport.”



The final sentence of this policy reflects Policy HN1-C in PlanMK.

16. This application, which is all to the South of the railway line, covers just under half the SEMK site at 92.7 hectares and the applicant is proposing 1,700 dwellings. This gives a gross figure of over 18 dwellings per hectare which is clearly contrary to the SPD.
17. More specifically the applicant has identified 41.51 hectares for housing; this gives a density of about 41 dwellings per hectare. By way of comparison it should be noted that the approved plan for Broughton, which has been identified as a “high density” area in MK, is planned to provide 39 dwellings per hectare.
18. The density proposals put forward by the applicant are clearly contrary to the policies in both PlanMK and the SPD. Furthermore they are contrary to the existing densities in the adjacent settlements and will create a slum area in a prestige site within the key settlement of Woburn Sands (as defined in PlanMK), and Bow Brickhill.
19. The applicant states that 52% of the properties will be 1-2 bedrooms (19% flats and 33% 2 bed houses). No justification is provided for these figures. It is essential that a robust housing needs analysis in the existing settlements be prepared as was done in the successful Parklands development in Woburn Sands. In that case the developer worked with the Town Council to establish needs and this was reflected in the final mix of accommodation.
20. For these reasons the housing proposals in the application are wholly unacceptable.

Miscellaneous

21. The **Gypsy and Travellers Site** is part of this application but the applicant refers to this as “potential” (para 5.8 of the DAS) and indicates that a separate application to develop this will be submitted “by others”.
22. This is unacceptable – the applicant cannot be permitted to proceed with a partial application.
23. Figure 14 of the DAS indicates that **Playing Fields** should be located adjacent to Bow Brickhill. However the SPD proposes that these should be located in the buffer zone adjacent to Woburn Sands; the logic of the SPD proposal appears to have escaped the applicant – both Bow Brickhill and Wavendon already have excellent playing fields while the residents of Woburn Sands do not have access to any playing fields. It is therefore



sensible, and in line with the principle of complementarity, that the new playing fields provided as part of SEMK should be located adjacent to Woburn Sands.

24. The layout proposed in the SPD suggests that the site for **new schools** should be adjacent to the Bow Brickhill Road; the applicant is suggesting that these should be relocated to back on to the railway line. There seems no logical reason for this suggestion.
25. There are a number of other discrepancies in the layout proposals made by the applicant. These indicate that the applicant has failed to understand the logic of the SPD and has failed to appreciate the relative strengths of the existing communities. No audit appears to have been carried out of the community facilities in the adjoining settlements.
26. The applicant must be required to carry out such an audit and to work with other developers in order to produce an acceptable scheme.

Consultation Process

27. Although the applicants states that adequate consultation has taken place this is not borne out by the facts. No public meetings or exhibitions have been held; the applicant did not consult the Town Council (or other Parish Councils) before submission. The applicant published a leaflet to all householders inviting residents to visit their website and complete a survey. The leaflet itself is misleading – the only illustration of the housing to be provided is of four bedroomed properties while the applicant is in fact proposing that over 50% of the properties should be 1-2 bedroomed. The application states that the website was visited by 1715 visitors and that 261 completed survey forms. This is wholly inadequate in view of the importance of SEMK.

Recommendation

28. The Woburn Sands Town Council recommends that this application be refused and that the applicant be advised that they must work with the other parties interested in developing SEMK to put forward a scheme which will meet the aims set out in the SPD. The Town Council would be happy to play an active role in this process.

Yours sincerely,

A handwritten signature in black ink that reads "Alison Jordan". The signature is written in a cursive, flowing style.

Alison Jordan
Town Clerk