



Robert Brigden
Milton Keynes Planning
Civic Offices
Milton Keynes
MK9 3EJ

13th June 2023

Dear Robert,

Application no: 22/00524/OUTEIS

Proposal: Outline application (matters of principle and access to be considered with matters of layout, scale, appearance and landscaping reserved for later consideration) for a Mixed-use urban extension comprising up to 1920 units of 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

Many of the points made in June 2022 in the response by Woburn Sands Town Council (WSTC) to the original outline application still stand, as little was done by the applicants in this reapplication to ameliorate them. So the Town Council ask that this original response to be referred to as well as the following.

A. Lack of cohesion and cooperation in the overall SEMK plans.

1. WSTC are still of the opinion that it is essential a comprehensive plan be prepared by ALL the developers and landowners in the SEMK land to make sure the area is developed in a logical and consistent manner as set out in the Supplementary Planning Document (SPD), rather than a set of piecemeal ones. At present this is not the case.
2. There are clear inconsistencies particularly the lack of both coordination and agreement for an overall plan with other land owners. Parcels of land owned by small landowners, which are not incorporated into a cohesive overall plan, lead to some disastrous consequences such as the location and layout of the school, which at present wraps around a piece of land not owned by L&Q, splitting the site of the school: a totally unworkable solution. This is not a layout problem (to be dealt with in Reserved Matters applications) but one of a totally chaotic and insular plan, with no cooperation between landowners.

MEMORIAL HALL, 4 HIGH STREET, WOBURN SANDS, MILTON KEYNES MK17 8RH
CLERK: ALISON JORDAN
TELEPHONE 01908 585368 (24HRS)
EMAIL a.jordan@wstc.org.uk

www.woburnsands.org.uk



3. Not only that, but the plans cannot be considered until EWR firm up their plans, particularly concerning grade crossings linking the site(s) to the existing communities of Brown's Wood, Old Farm Park and eventually of Wavendon – all to the north of the railway line. EWR's most recent documentation is purely at the planning stage so any outline plans by developers cannot be considered until a definitive railway plan is developed and a surety. Any changes to EWR plans would radically alter the SEMK access and context, and could override any planning permission granted at a later stage.
4. Housing density, transport links, and the relationship between the housing areas and the supporting facilities must be properly planned across the whole of SEMK, as must the linkages into the adjacent areas. This needs to include the extension of H10 planned by MK Council as a priority before the development of Church Farm in Wavendon as well as any links from the site across the railway line to other MK communities to the north.

WSTC are adamant that this application cannot be considered in isolation and must therefore be refused.

B. Transport and Movement

1. 5.1.3. of the SPD states: *"All landowners should ... have their land included in a planning application so that connectivity through the SEMK can be delivered."* This has clearly not been met in this application as several disconnected plots south of the railway line and land to the north of the railway line have not been included in either of the other two application sites. (L&Q and O&H).

5.1.4. of the SPD also states: *"SEMK principles including:*
 - *Key public transport infrastructure and routes should be established at an early stage in each phase.*
 - *Co-ordination between multiple develops to ensure that all necessary infrastructure required to facilitate the development is agreed and implemented in a timely fashion."*This is clearly not the case in the above outline application.
2. There are no links from the application site north to the rest of Milton Keynes across the railway line linking with the grid roads of Milton Keynes. Although land has been safeguarded for an extension to the V11 shown on the map on p37 of the Design and Access Statement (DAS), and reference was made on P59 of the DAS showing future grade crossings to be delivered by EWR, unless the grade crossings are part of the plans for this section of land, they are unlikely to be built as neither the developer nor EWR will see it as their duty to construct them. This is particularly the case of EWR, as in their most recent documents they have discounted any bridges being built across the railway in the vicinity of the SEMK site. This will mean that vehicular



traffic egressing the site will enter and leave via the Bow Brickhill/Woburn Sands Road, clearly shown on the map on P26. This will throw traffic through Woburn Sands and Aspley Guise along narrow village roads unsuitable for such volumes and already congested at the best of times. It will also throw traffic onto the junction of the V10 and Bow Brickhill railway crossing, leading to massive traffic build up when the level crossing gates are lowered (6 times an hour).

3. The statement referencing PlanMK: Policies CT1-15 stating that transport serving the development seeks to reduce congestion is disingenuous to the extreme as such traffic flows will increase congestion in the adjoining settlements of Woburn Sands and Bow Brickhill.
4. The traffic modelling shown in Appendix J Model Development Report from Systra was done in 2019 before the completion of the warehouse complex in Caldecotte and therefore must be re-submitted to include modelling for this complex once fully open and at capacity. It also uses a model area that carefully excludes Woburn Sands, Aspley Guise, Husbourne Crawley, Woburn and Wavendon, as well as Church Road in Bow Brickhill. Drawing the modelling area in this way intentionally excludes critically congested and constrained roads, including to the local high street, garage, shops and communities as well as areas that show a huge increase in leisure traffic at weekends when Bow Brickhill and Woburn Sands have a large influx of bikers, walkers, horse riders and golfers. The traffic modelling across SEMK must include the whole area taking in all of Bow Brickhill and Woburn Sands, Aspley Guise and through to M1 Junction 13 (including the adjacent Bedfordshire communities which are part of Woburn Sands and share local facilities). It must also include traffic planning at the weekends.
5. 3.10 of the National Planning Policy Framework states the development should be integrated with the adjacent grid squares, public transport services and strategic and local highway grid network. This is not the case in the submitted plans. The aim of SEMK is to create a sensitive, high quality and sustainable extension to Milton Keynes....and an inclusive place, physically and socially integrated with the existing development (of Milton Keynes). This will not be possible if the transport/movement links for all traffic does not link with the existing grid roads.

Considering the lack of planned connectivity between the application site and the rest of Milton Keynes, and particularly the lack of clarity on/unknown equation of EWR, the application should be refused.

C. Housing numbers and density

1. The map on P21 and legend on P22 of the DAS shows clearly how land ownership is influencing the various applications for SEMK. They also show how fragmented the applications are (where they have been made) and will be in the future. Of the 3000 maximum number of dwellings planned for the whole of the SEMK, stated in the



SPD, 1920 dwellings have been outlined for the present application site. **This is an increase from 1700 dwellings in the original outline plans.** Considering that this section of the development, taking up about half of the whole SEMK, also contains schools, a community hub, retail units and some recreational areas, not only is the number of houses too great, but also the density of housing will be too high – necessitating a huge number of three and four storey units which puts pressure on the social fabric of a community. Dwelling density has crept up from the original 35dph to 38.8dph (dwellings per hectare). Considering that Broughton has a density of 37dph and is a very urban community, a projected density of 38.8dph is far too high for a semi-rural community on the south east edge of Milton Keynes.

2. If the developers are given permission to build this number of dwellings on this area of land, not only will the other developers on the SEMK site feel they have carte blanche to apply for similar densities, but also the number of dwellings will far exceed that originally planned in the SPD, especially when the housing in the Swan Hill development, already granted permission in Woburn Sands, is added to the equation.
3. It is clear that this application has paid scant attention to the design code and quality of placemaking in the SPD. *“Masterplanning of the site and built development(with reference) toward the existing settlements adjacent to..... the site should respect the character of Wavendon, Woburn Sands and Bow Brickhill”*. p36 SPD.

Until all the developers from all parts of the site get together and agree on an integrated housing plan, adhering to the SPD, and in sympathy with the existing adjacent communities, the application should be refused.

4. Facilities and Services

1. The original SPD proposed that the playing fields should be located in the buffer zone adjacent to Woburn Sands rather than in Bow Brickhill, which already has excellent playing fields whilst Woburn Sands has none. This was commented on by WSTC in the original response to the outline plans in June 2022, but the developers of the present application have still pursued their plans to locate at least two pitches on the outskirts of Bow Brickhill. This must not be detrimental to Woburn Sands having such or larger facilities.
2. On page 36 of the DAS, there is a list of community and retail facilities in the local centre which has been headed ‘can include’. Such vagueness of provision, although obviously not able to be a definite, cannot be left to chance nor as to uncertainty of the number of units provided. It runs the danger of a very limited service provision. Given the lack of connectivity between the application site and the rest of Milton Keynes, and the tenuous road links between there and other local communities, the local centre must be self-sustaining and of sufficient variety to make sure residents do not need to travel out of the community. This is particularly important when



considering that the adjacent development site of O&H Properties, which is almost entirely made up of residential units and quite some walking distance from Woburn Sands High Street. If the local centre in the applicant's parcel of land does not provide a wide variety of services, then more people will be forced to travel to adjacent communities such as Woburn Sands for their service/shopping needs.

3. Given the change in working practices, partly as a result of the Covid pandemic, residents will increasingly work from home. There appears to be no nod to this change in live/work styles or to employment hubs, which will call for local trade units with businesses to reduce carbon impact.

Again, this links back to lack of joined up thinking between the developers, and an unseemly rush to start developing before an overall vision of the SEMK is achieved. Therefore, WSTC urges MKCC to refuse this application.

Yours sincerely,

Alison Jordan
Town Clerk