

Woburn Sands Town Council Response to draft SEMK Development Framework issued by MKC January 2021

A Introduction, the Site and its Context (Foreword, Policy SD 11, and Section 1.7: Strategic Context)

1. The draft Development Framework makes clear that, at the time of preparation, future policy in respect of two key infrastructure issues is unknown:
 - The future development of the East West railway
 - The future of the Oxford- Cambridge Expressway
2. It is understood that the East West Rail Company will publish initial proposals (for both the track and stations) in respect of the railway in the next couple of months; there will then presumably be a period of consultation before final decisions are made.
3. Proposals for the development of an O2C Expressway were paused in 2020 and have now been cancelled although discussions will continue on improving the road link between Oxford and Cambridge.
4. Policy SD11 in PlanMK specifies that no decisions on the development of SEMK should take place until the route of the proposed O2C Expressway was known.
5. In view of the above uncertainties MKC has failed to undertake a Strategic Transport Review for the area, which was a commitment made some time ago. Such a commitment was in line with the general principle underlining the original development of Milton Keynes – namely Infrastructure before Expansion (I before E) which emphasised the importance of finalising the transport infrastructure before any development takes place. There is therefore no transport data available on which to base any transport decisions (which is acknowledged in the draft Development Framework as indicated by the inclusion of three transport options in Figures 4.2 – 4.4).
6. In March 2021 MKC approved the Development Framework for Milton Keynes East which provides for 5,000 dwellings; this has come forward earlier than anticipated in PlanMK and is supported by a Government grant to provide a link across the M1. This approval, coupled with existing permissions, means that Milton Keynes meets the requirement for a five year land supply more than adequately without the contribution from SEMK. There is therefore no pressure to approve the SEMK Development Framework in the immediate future.
7. The approval of the Milton Keynes East Development Framework fundamentally alters the original concept of SEMK, particularly in terms of density, and this is explored further in WSTC submission under Section E (Character: Housing).
8. Notwithstanding the above comments WSTC recognises that there is considerable momentum to continue the development process in Milton Keynes given that it is one of the fastest growing communities in the UK. However it is important that the correct framework is in place for the SEMK area particularly in view of the fact that the site impinges on the established communities of Woburn Sands, Bow Brickhill and Wavendon. WSTC therefore suggests that the process to approve the final Development Framework for SEMK should proceed with caution until a robust Strategic Transport Plan

for the wider area is available. It is however accepted that informal discussions and consultations should continue to be held on other aspects of the Development Framework.

9. In these circumstances MKC should consider publishing a second draft Development Framework taking account of the comments received on this draft and reflecting the latest strategic transport information before finalising the Framework. This would also give more time for residents to comment (which has been very difficult to date due to COVID restrictions since no public meetings have been held).

B Vision (Para 3.2)

1. In general WSTC is content with the Vision and is particularly supportive of the need to become a “green” development linked into the grid system but distinct from the existing settlements of Woburn Sands, Wavendon and Bow Brickhill. However the phrase “feel like an extension to the grid squares of Milton Keynes” is not consistent with the idea of maintaining the character of the existing settlements.
2. WSTC does not consider that some of the aspirations set out in the Vision have been satisfactorily met in the detailed proposals in the draft Development Framework. For example the Vision emphasises that SEMK will be a distinctive community seen as an extension of Milton Keynes but distinct from the existing communities. However, later in the Development Framework, it is stated that SEMK should incorporate “A strategic movement network to accommodate through traffic” (para 3.4: Movement) – this is clearly incompatible with the Vision.
3. The Town Council’s concerns over the robustness of the proposed Vision are set out in greater detail in the other submissions from WSTC but the Town Council’s overarching concern is that the development of SEMK should not adversely affect the welfare and wellbeing of the current residents of the area or its environmental and wildlife assets. There must be proper consultation with existing residents (which has not been possible in the COVID regime) and adequate investment by the SEMK developers into existing local facilities must be provided.

C Movement Framework (Section 4.3)

External Transport Links

Road Access

1. WSTC supports the principle that the main road access should be via the V10, V11, and H10 with appropriate subsidiary access to Woburn Sands, Bow Brickhill and Wavendon. The Town Council also supports the proposal for a Bow Brickhill By-Pass.
2. However WSTC is wholly opposed to the suggestion that the H10 should be continued as a Grid Road joining the Newport Road since
 - (a) this will lead to a major increase in the traffic on Newport Road (which is already significantly congested);

- (b) it would open up the possibility of linking SEMK with any developments between Newport Road and the M1 (para 2.3.10); in the Town Council’s view this would be detrimental to the wider Woburn Sands area;
 - (c) it would destroy and blight a significant number of existing properties on Newport Road and Wavendon as well as causing severance of the community there.
3. A link between the eastern end of H10 and Newport Road is however essential in order to enable traffic to access Woburn Sands (and the M1 via the Kingston roundabout). This should be of an appropriate “B” grade.

NB The proposed road connection between the end of the H10 and Bow Brickhill Road has been designated “Woodleys Road” in the draft Development Framework. Woodleys Farm, whose property includes a rail bridge known as Woodleys Crossing and a private driveway into Bow Brickhill Road, is situated about 400 metres from the eastern boundary of the SEMK designated site. To avoid confusion consideration should be given to re-naming this proposed road connection in the Development Framework but this terminology has been used in this submission.

- 4. WSTC supports the proposal to restrict the junction between “Woodleys Road” and Bow Brickhill Road (para 4.3.9). It is essential that only local traffic be allowed to access Woburn Sands through The Leys, Hardwick Road and Theydon Avenue – the town already suffers from an excessive volume of through traffic at times. The Town Council looks forward to discussions on how this can best be achieved.
- 5. WSTC notes the proposed Street Hierarchy set out in Table 4.2 but has concerns over the proposal to change the standard when Bow Brickhill Road becomes the proposed Bow Brickhill By-Pass. Bow Brickhill Road, as the southern boundary of Milton Keynes, borders the greensand ridge and must be retained as a rural road and not become a Grid Road. The Town Council would welcome further discussion on how Bow Brickhill Road becomes the Bow Brickhill By-Pass.
- 6. There must be appropriate pedestrian crossing points on the Bow Brickhill Road to enable access to Wavendon and Browns Woods as per the draft Vision (para 3.2).
- 7. There are two paved driveways (Paddocks Lane and an unnamed driveway) – one of which is the private drive from Woodleys Farm as noted above - on to Bow Brickhill Road; there are also two small unpaved access roads into agricultural holdings. All these accesses should be closed up in order to preserve the integrity of Bow Brickhill Road.

Woburn Sands Railway Station and Transport Hub

- 8. There are various references in the draft Development Framework suggesting the possibility of relocating the Woburn Sands Railway Station and developing a Transport Hub to link the proposed Mass Transit System to the East West Railway. Woburn Sands is identified as a Key Settlement in PlanMK and it is important that robust public transport links between Woburn Sands and other parts of Milton Keynes are maintained; the concept of a Transport Hub is therefore supported in principle.

9. The Woburn Sands Station is a key component of the town's heritage (the Station's buildings are listed). Para 2.9 of the draft document states "Where necessary development within the SEMK site should conserve the significance of these listed sites".
10. The East West Rail Company has not yet published any proposals in respect of the location of the station. WSTC cannot see any reason to relocate the station. There is adequate room to extend the platforms if required and space on the North side of the railway to construct appropriate office/ticketing facilities. Furthermore the Pristine Wheels site is currently for sale and could accommodate both parking and a Transport Hub.
11. The nature of a Transport Hub has yet to be determined and it is not known how the proposed Mass Transit System will link into the bus service (whatever nature the service may take). Appropriate links, including pedestrian links, between Woburn Sands and the hub will need to be incorporated.

Internal Transport Network

12. The draft Vision for SEMK (para 3.2) states that "it will be a new community for the 21st century and be designed to foster a strong sense of community and belonging". WSTC supports this aspiration but has concerns that the relevant sections in the draft Development Framework do not deliver this.
13. In common with other estate developments in Milton Keynes, none of the roads within SEMK should be Grid Roads as appears to be the case in the proposed three transport options (Figures 4.2 – 4.4). Neither the V11 when extended into SEMK nor "Woodleys Road" should be Grid Roads but should be residential roads (as per the Street Hierarchy in Table 4.2).
14. It is important that the speed of traffic through SEMK should be controlled both for the safety of residents and for environmental and health reasons (30 mph).
15. There should also be a network of pedestrian and redway links throughout the development with strong links through to Woburn Sands, Bow Brickhill and Wavendon in order to reduce transport pollution, protect the natural environment and promote improved public health and wellbeing.

D Landscape and Open Space Strategy (Section 4.2)

1. WSTC strongly supports the general concepts regarding the importance of green spaces and buffer zones. The following comments provide more details from the Town Council's perspective.
2. The area identified as part of the Swan Hill development between "Woodleys Road" and Newport Road should not be developed for housing (as shown on Figure 3.1) since this will result in coalescence between SEMK and the existing settlement which is directly contrary to the policies set out in PlanMK and the Vision. This area should become part of the buffer zone protecting the existing settlement of Woburn Sands (and also part of the proposed linear park along the railway line).

3. All the land between “Woodleys Road” and Newport Road should be a buffer zone as per Policy SD11 in PlanMK. Furthermore there should be no traffic access from the Swan Hill site on to Newport Road as proposed by the developers of the site (apart from emergency access) since this road is already very congested and will become more so when rail traffic increases; there is also likely to be a further increase in the traffic along the Cranfield Road given the expansion plans of Cranfield Technology Park. The scale of this increased traffic volumes needs to be modelled as part of the Strategic Transport Review which has yet to be undertaken (see WSTC comment A5).
4. WSTC recommends that the buffer zone immediately to the west of Woburn Sands, which includes the fishing lakes, should become the Woburn Sands Country Park accessible to residents of both “old” and “new” Woburn Sands. This was originally put forward in 2000 as a Millennium Funding Bid but did not proceed due to lack of funds. The SEMK development now provides the opportunity to realise this ambition. The Town Council supports the proposal that the fishing lakes should be opened to the public (4.2.10); until about five years ago it was possible to walk around the lakes which was of considerable benefit to local residents. The Country Park should include open spaces with trees, bushes, and meadows which are extremely important for promoting biodiversity.
5. The Town Council carried out a survey in 2020 to establish priorities for the renovation of the WS Recreation Ground (funded by s106 funds). That survey (completed by over 100 residents) identified the following priorities which could not be accommodated in the Recreation Ground but which would be very suitable for the Country Park:
 - A football pitch
 - Picnic and BBQ pitches
 - A jogging trail
 - A wildlife area
 - Wood sculptures
6. The draft Development Framework proposes this area as a possible location for football pitches and this would be welcomed by the Town Council. The detailed layout of the Country Park (including how many football pitches could be accommodated given the other requirements) requires further study.
7. WSTC supports the concept of linear parks alongside the railway line as valuable recreational areas and wildlife corridors.
8. There is a natural link between the existing linear park in Parklands, the Country Park, and the linear railway parks; this needs to be supplemented by other pedestrian links from Parklands and the Grove estates in Woburn Sands.
9. Virtually all the linear parks and the WS Country Park are within the parish of Woburn Sands. WSTC notes that it is suggested that the Parks Trust manages these areas (para 4.2.19) and looks forward to working with the Trust to ensure complementarity of the facilities with the existing facilities in the town.

10. There also needs to be a specific direction in the final Development Framework requiring the provision of a narrow green buffer along the north edge of the Bow Brickhill Road to supplement the enhancement of the existing hedgerow.

E Character (Housing) (Section 4.5)

1. Policy SD11 in PlanMK designates SEMK for the development of “approximately 3,000 dwellings”. No precise figure was given since, at the time of preparation, nothing was known about the route of the proposed expressway.
2. No calculations have been provided on how the figure of “approximately 3,000” was calculated. The SEMK development covers 198 hectares so 3,000 dwellings is equal to 15.15 dwellings per hectare. This is very significantly higher than Woburn Sands (even allowing for the increased density of Parklands). Furthermore it is significantly higher than the density approved for Milton Keynes East – there are 461 hectares in that development for which 5,000 dwellings have been approved (ie 10.84 dwellings per hectare).
3. There are two consequences of this higher density. First the nature of the housing proposed in the draft Development Framework contains a significant number of 3, 4 and even 6 storey blocks which are completely out of character for the area. Secondly, the land available for buffer zones with the existing settlements (particularly for Wavendon but also for Woburn Sands) has been squeezed to the detriment of those communities.
4. SEMK will be the southern-most estate in Milton Keynes bordering on the Greensand Ridge and should therefore have the lowest density in MK to allow for a “natural flow” into an unspoiled recreational area. It is also important that lower density should be required for all housing adjacent to the existing settlements of Woburn Sands, Wavendon, and Bow Brickhill. Since the eastern half of SEMK is in the parish of Woburn Sands it is particularly important that the density and balance of housing in this area are compatible with the existing provision in the parish.
5. In view of the foregoing WSTC recommends in the strongest possible terms that the maximum capacity of SEMK should be reduced from “approximately 3,000” to 2,500 dwellings (density 12.62) and preferably 2,000 (density 10.10). A reduction of this order is reasonably consistent with the original idea of “approximately 3,000” and would not create a significant problem for Milton Keynes as a whole (particularly in view of the approval of Milton Keynes East). It would however enable a much more acceptable scale of development in the wider South East of Milton Keynes.
6. On points of detail in the draft Development Framework it is noted that higher densities are suggested for houses overlooking recreational areas (para 3.1.7). Figure 4.5 appears to suggest that there could be four storey flats overlooking the lakes; these would be directly opposite the existing properties in Parklands and would be intrusive. Figure 4.5 also indicates a maximum of 3 storey blocks along “Woodleys Road” and Bow Brickhill Road. This is not consistent with the Vision.

7. WSTC would welcome further discussions on the capacity, density and balance of housing (paras 4.5.2 – 4.5.5) as more detailed plans are developed. Decisions on these points have a crucial impact on community cohesion.
8. The Town Council assumes that all properties would be required to include solar panels and other energy saving features; they should also be required to have electric charging points for cars.
9. Affordable housing (para 4.4.3) should be distributed throughout the site and not concentrated in a few areas in order to support community integration.

F Land Use (Section 4.4)

Gypsy and Travellers Site

1. WSTC is unconvinced of the need for a Gypsy and Travellers Site. SEMK, as a key residential extension to Milton Keynes, is a wholly inappropriate location for a G&T site. Provision already exists elsewhere and it should be possible to extend these sites at a minimal cost.
2. If it is decided that a G&T site should be incorporated in SEMK then WSTC would support the proposed site adjacent to Bow Brickhill Station since this would seem to be the site with the nearest conformity to the principles set out in 4.4.6 and 4.4.7

Education Facilities

3. WSTC welcomes the increased level and diversity of educational provision which SEMK will provide.
4. Most of the primary level children in Woburn Sands, and many of the secondary level children, attend schools in Central Beds. It is important that, when developing the schools in SEMK, proper account is taken of the CBC Future Schools Programme. The effect of the increased size of the primary provision in Wavendon due to the new school in the SLA needs to be taken into account when planning the SEMK provision.
5. The location of the proposed schools requires careful thought. The primary schools could have about 600 pupils and the secondary school about 1000, some of whom will come from outside SEMK. These numbers will generate a significant amount of traffic and street planning and parking needs to take account of this.
6. On a point of detail the Town Council suggests that the proposed location of a primary school to the east of “Woodleys Road” is inappropriate since it would require pupils to cross a busy road.
7. There does not appear to be any mention made for early years provision; this should be included in the final Development Framework.

Medical and Welfare Facilities

8. Very little is mentioned in the draft Development Framework apart from referring to the health centres in Woburn Sands and Walnut Tree (para 2.8).
9. There is currently insufficient capacity in these centres to cope with the existing population.
10. There is therefore a need to provide additional facilities in SEMK which should be developed in conjunction with the existing Medical Centres. It is essential that there is a coordinated medical and welfare service across the whole of SE Milton Keynes including the existing settlements.

Other Facilities

11. WSTC strongly supports the importance of ensuring complementarity of provision of facilities (para 2.12.1, and page 35). Developers must be required to include a detailed review of what is already available in Woburn Sands, Wavendon and Bow Brickhill before bringing forward proposals for SEMK. Duplication of facilities should be avoided since that will reduce the economic viability of individual facilities. For example there is already a Sports Hall and large community hall in Woburn Sands, and sports fields with adjacent pavilions in both Bow Brickhill and Wavendon.
12. No mention appears to be made in the draft Development Framework for restaurants and public houses; these (along with recreational facilities such as the Woburn Sands Country Park) are essential in order to support community cohesion and should be planned to complement similar facilities in the existing communities.
13. All facilities, such as the proposed Community Hub and shopping centres, should be located so that they serve the wider population.
14. A number of existing facilities would benefit from a modest injection of resources and this should be covered through appropriate s106 contributions from the SEMK development.

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