

MK City Plan 2050

Milton Keynes

MK9 3EJ

Civic, I Saxon Gate East

### **Wavendon Parish Council**

Chair: David Hopkins Clerk: Alan Kemp

57 West End Long Whatton Loughborough Leicestershire

> LE12 5DW 01509 844241

Email: clerk@wavendonparishcouncil.co.uk

Website: www.wavendonparishcouncil.co.uk

4 October 2024

#### Plan MK2050 Consultation

I have been asked by my Parish Council to respond to the above-mentioned Plan MK2050 Consultation and our comments are noted below.

#### Introduction

The following representations are submitted by Wavendon Parish Council in relation to the MK City Plan 2050 Regulation 18 consultation.

#### **Background**

The Parish of Wavendon has been under significant and continual development pressure in recent decades, which has had an impact on the established character of the village as well as the resolve of local residents. Given the existing policy regime contained in the adopted Plan:MK the recent development pressure experienced will remain for at least another decade, bringing with it ongoing environmental, health, noise, transport and social infrastructure related challenges.

Wavendon Parish Council has sought to address these issues, over the years, and will continue to be proactive in working with the City Council to achieve sensible planning outcomes. We request that a balanced strategy be taken to new development proposals, in the 2050 Local Plan, rather than the rather piecemeal and uncoordinated delivery that has been a feature of much recent development.

The impact of strategic development proposals on Wavendon, both planned and potential, and our engagement with the planning process, in recent decades, can be summarised as follows:

#### No Expressway

The parish formed part of the No Expressway campaign that persuaded the then government to remove plans for an MK to Cambridge Road expressway that would have passed through the parish. It has supported the reopening of the rail link from Bletchley to Oxford and the completion of the dual carriageway link from the Kingston Roundabout in Wavendon parish uninterrupted (from 2027) to Cambridge. The final part of that fast link is under construction (between the Black Cat Roundabout and Caxton Gibbet).

#### The Impact of Recent Local Plans

#### 2001-11 Local Plan and the creation of the SLA's (Strategic Land Allocations)

The 2001-2011 Local Plan included proposals for what were described as Strategic Land Allocation areas (SLA's) for development at Glebe Farm, Eagle Farm South and Church Farm. The Eagle Farm South and Glebe Farm developments (over 3500 dwellings) have been largely constructed but the Church Farm SLA (some 350 dwellings) has yet to be built out. That land now forms part of land adjacent to the SEMK development and is planned to be constructed as the infrastructure for the upcoming SEMK development is rolled out.

#### The Core Strategy – SRA's (Strategic Reserve Areas)

The MK Core Strategy adopted in 2013 provided an ambitious vision for ongoing growth through to 2031. That updated version of the local plan contained a further commitment and extension to the allocation of land known as SRA's at Glebe Farm and Eagle Farm South. All of those areas, apart from Church Farm, have now largely been completed.

#### Plan MK

In 2019 MK Borough Council adopted Plan:MK (again a vision for development through to 2031) which was in many ways the Core Strategy updated in line with central governments ambitions for the so-called Oxford/Cambridge Arc. Plans for the Arc contained a vision for one million news homes between Oxford, MK and Cambridge, although the term Arc has now been dropped and the vision 'reviewed', and the ambition downgraded. Plan:MK contained proposals for further urban expansion in an area known as South East Milton Keynes (SEMK). Up to 3,000 dwellings would be constructed, plus 350 for Church Farm, with accompanying infrastructure on land between Wavendon, Woburn Sands, Walton and Bow Brickhill with 1000 more dwellings in Wavendon parish, 2000 in Woburn Sands and 1000 in Bow Brickhill.

#### **Five Year land Supply**

Wavendon has seen additional development within its older settlements in recent times through the Councils inability to demonstrate a 5-year housing land supply.

The Parish Council has long called for a 'planning holiday', a period of time when consented developments continue to be built out and communities integrated before any additional large scale planning permissions are permitted. With the exception of development necessary to deliver a District Park east of Wavendon, the Parish Council supports Milton Keynes City Council's intention to resist further development east of Wavendon until at least 2038.

#### **East West Rail**

Whilst development of the East West rail link from Bletchley to Oxford is near completion and due to (re)open in 2025, there is currently much debate and uncertainty regarding the eastern expansion from Bletchley to Cambridge.

Wavendon benefits from a connection at Woburn Sands station, some 500 metres from the parish boundary, which has previously been announced as one of only two station stops, between Bedford and Bletchley, for any proposed Oxford service.

The planning powers enjoyed by the East West Rail company in effect trump any planning powers contained within the local plan and residents in Wavendon, living as far as one mile away from the line, have been contacted in connection with possible new road bypass routes, bridges and the creation of transport interchange hubs close to Woburn Sands station (which may be relocated). This uncertainty throws considerable doubt on any plans MK City Council may adopt and the Parish Council urges that consideration be given to implementing a short pause on the local planning process (say for 12 – 18 months) until there is certainty regarding the future of East West Rail (east of Bletchley).

#### **Central Government Plans for new towns**

The new government elected in July 2024 has set out its long-term vision to deliver largescale new communities of at least 10,000 new homes and up to a dozen in number as part of its drive to deliver 1.5 million new homes over the coming five years.

Appropriate locations for new towns are to be recommended within 12 months (i.e. by July 2025). Newspaper articles published in advance of the general election highlighted the now governments ambitions for development along 'the M1 corridor' with specific mention being made to development in north MK, south Northants and the so-called Aspley-Guise and Ridgmont corridor development area.

The Parish Council asks what impact such an announcement would place on the delivery of Plan MK 2050 and request that the allocation of new settlements be given further (re) consideration as part of the Reasonable Alternatives considered during the Local Plan review process.

Once again, the Parish would urge a pause in the MK2050 Local Plan process to allow certainty in the planning process and for planning to proceed, only with the benefit of a complete picture of local and national government expectations and ambitions.

## Comments on Draft Polices Contained within MK2050 draft Local Plan

#### Policy GS15 – East of Wavendon Strategic City Extension

Wavendon Parish Council generally supports this policy.

In particular we support the delay to any development on this site until 2038 at the earliest, and its relationship to Policy GS9 (infrastructure). The Parish Council fully endorses the separate representations made by a well-supported residents' group in support of a District Park (of at least 12 hectares) in addition to the preservation and enhancement of the grade 2 listed parkland surrounding Wavendon House. (\* <a href="https://bucksgardenstrust.org.uk/wp-content/uploads/2020/05/Wavendon-House-BGT-R-R-dossier-13-May-20.pdf">https://bucksgardenstrust.org.uk/wp-content/uploads/2020/05/Wavendon-House-BGT-R-R-dossier-13-May-20.pdf</a> ).

Wavendon Parish Council fully supports discussions that could lead to the early release of the land for use as a District Park rather than having to wait until the release of building land, i.e. after 2038.

The Parish urges careful consideration be given to the scale and design of any connection to the site which it is anticipated would be via a Keightley Gate access to the A421, remembering this is an existing residential area which would itself potentially border the proposed District Park allocation.

Local connections to the land east of Newport Road (from Newport Road itself) and from Cranfield Road are to be welcomed but the scale of links into any future development in Central Beds (the Aspley Guise triangle) need to be constrained.

Furthermore, Central Beds Council needs to fully endorse (through its duty to cooperate) the basic principle of no development prior to 2038 (and thus, for the Central Beds area, not likely until well into the 2040's) for the land in its Aspley Guise triangle given its reliance upon MK for many of those future transport links. Central Beds Council may have to look eastwards from the Aspley Guise triangle for connections onto the A421 should it wish to develop that area in advance of 2038.

References to an as yet to be defined form of Mass Rapid Transport - MRT public transport (likely to be buses), are to be welcomed but such services have to be in place from day one and sustainably funded over the long term to achieve the desired environmental, private car driver conversion to public transport and any associated community benefits.

Future safe pedestrian and cycle links from Eagle Farm South and Glebe Farm, crossing Lower End Road into the new areas to east of Newport Road (to the south of the still developing Eagle Farm South community) are to be welcomed.

Wavendon Parish Council would request that, at the appropriate time, it is fully involved with the development of a masterplan for the area which should include

- Highways planning (undertaken on a city-wide impact and allocation basis) not just a development-by-development basis. Existing local roads can no longer take the strain.
- Public Transport provision and the details associated with such transport i.e. a blend of MRT and localised estate wide services.
- Retail provision temporary and permanent.
- Community Infrastructure (in connection with local partners, MK Community Action).
- Design and location of schools (and nurseries, public and private) with appropriate community access agreements.
- Inclusion of additional provision for sports and leisure facilities including soccer and cricket (for which existing provision falls considerably short of meeting demand).
- Housing design and density.
- The provision of (genuinely) affordable housing.
- The full engagement of the parish in the allocation of S106 (or any future tariff monies) for the benefit of the parish as a whole.
- Climate impacts including the provision of SUDS (offering landscaping opportunities and enhancements to wellbeing) and the provision of supplies of water and drainage. For example, consideration to be given to the concept of the long-anticipated MK to Bedford Canal and its possible role in the movement of water from the wetter north and west to the drier east of the country, as well as its leisure and community (wellbeing) benefits.
- The provision of renewable energy resources on all housing, retail and employment sites within this new development area.
- Safe cycle and pedestrian access to be a priority, linking into the broader MK wide redway networks and Parks Trust managed parklands, including through access to the Greensand Ridge as it passes through the city boundaries.
- The provision, funded by S.106 monies, of a specialist consultancy report looking into the impacts of construction dust and noise on residents' health and wellbeing during this ongoing construction. Regularly breathing construction dust can cause diseases like lung cancer, asthma, Chronic Obstructive Pulmonary Disease (COPD) and silicosis and its impacts need to be taken seriously by MK City Council and measures to mitigate its potential negative health outcomes for all residents, young and old, existing and recently arrived.
- The location and design of the District Park east of Wavendon, including access arrangements and facilities as well as linkages to existing settlements and other open spaces.

#### Policy GS11 - Principles for Extensions to the City

Wavendon Parish Council fully supports policy GS11.

The principles for extensions to the city are supported and we welcome MK City Councils acceptance of the Parishes representations to the city council for a 'planning holiday' to enable existing developments to be built out in accordance with a phased programme and communities established and fully integrated. Wavendon Parish Council has always supported a policy of building communities, not simply building houses.

#### Policy GS16 - Wavendon Strategic Buffers

Wavendon Parish Council welcomes and supports the concept of the Wavendon Strategic Buffers.

We would welcome discussions with the city council as to how they might best integrate into a possible extension of sports and leisure provision potentially enjoyed by all local residents.

#### Policy GS13 - Development of Walton Campus

It now appears that the Open University is unlikely to be changing its location and will remain at Walton Hall. The Parish Council asks if the 1600 dwellings allocated for that site will need to be located elsewhere or if there is scope in the provision of 63,000 dwellings, and sufficient contingency, to allow those numbers to be in effect 'lost'?

#### **General Policies**

#### Policy GS3 - Strategy for Economic Prosperity

Wavendon Parish Council asks that all development sites allocated across MK, in the 2050 Plan, be phased to minimise any adverse environmental impact and to provide certainty that sites are likely to be developed at appropriate times throughout the plan period.

#### Policy PFHP1 - Delivering Healthier Places

The Parish Council believes that MK has fallen short in its delivery of sports and leisure provision, in particular for the support of soccer for all sexes and ages. The Plan MK2050 should look to provide an ambitious plan to address that shortfall and the positive legacy Leah Williamson and Deli Ali have left us as outstanding advocates for the talent that doubtless exists in abundance within the city of Milton Keynes.

## Policies GS10 - Movement and Access, PFHP1 - Delivering Healthier Places, PFHP2 - Protection and Provision of Community Facilities and PFHP5 - Designing People Friendly Places

The Parish Council considers that new developments should be designed to incorporate, as a standard feature, a 20 MPH limit within residential streets and a 50 MPH limit elsewhere and that this should be reflected in policy.

#### Policies GS6 - Open Countryside, CEA8 to CE12 - Protecting Green Spaces

Wavendon Parish Council supports policies that protect the Greensand Ridge.

The proposed Special Landscape Area (SLA) designation provides protection for locally significant and attractive landscapes that are of comparable quality to Areas of Outstanding Natural Beauty (AONB). The Greensand Ridge should be protected and enhanced, particularly through the planning process and the policy should relate not just to the ridge but also to land that immediately surrounds it, including the lower agricultural land and farmsteads that provide an important setting for the ridge.

### Policies PFHP5 - Designing People Friendly Places and PFHP6 - Designing Healthy Streets

Wavendon Parish Council support policies that incorporate the principles of Safer by Design for neighbourhoods and for traffic management that allows safe and unrestricted access to all parts of a development for emergency vehicles and fire engines in particular. That means sufficient off street and visitor parking to prevent obstructive parking.

### Policies CEA6 - Low and Zero Carbon Energy Provision and CEA7 - Mitigating wider environmental pollution.

Wavendon Parish Council supports policies that enhance the availability of electric vehicle charging points that are accessible and safe to use.

The Parish Council also supports the provision of an additional municipal site (or sites) for household waste recycling on the eastern side of the city.

### Policy ECP1 - Protecting Employment Land and Buildings and ECP2 - Supporting the vitality and viability of centres

The Parish Council considers that unwelcome and unauthorised HGV parking is becoming an increasingly common occurrence across MK (in a city famous for the provision of numerous logistics warehouses) and the plan MK2050 should include the requirement for a fully serviced HGV lorry park, either within or adjacent to any new warehousing proposed.

# Policies GS3 - Strategy for economic prosperity, GS4 - Strategy for People Friendly and Healthy Places and Policy ECP2 - Supporting the vitality and viability of centres

Milton Keynes likes to be known as a Smart City, but a smart city is only as smart as its weakest point in terms of its broadband provision via fibre and/or wireless. Wavendon Parish Council believes that such state-of-the-art provision should be a prerequisite and condition associated with any new development. This enhances business competitiveness, leisure and retail attractiveness and enables stay at home smart devices to be enabled for more elderly, infirm or disabled residents.

### Policy GS4 - Strategy for People Friendly and Healthy Places and GS5 - Our Retail Hierarchy

Wavendon Parish Council believes that consideration should be made for the provision of temporary retail outlets and the supply of community houses (for a five-year period) to support communities and enable community development in small and welcoming environments for new residents. The community houses would then be returned to the housing association or local council for residential rental at the end of the five-year period.

### Policy PFHP2 - Provision and Protection of Community Amenities and PFHP3 - New Local Centres

The Parish Council considers that the provision of doctors and dental surgeries, early on in the development process, should be a priority. Furthermore, working with existing NHS providers (in the first instance) to see if they might extend or operate additional buildings is essential and sensible given their existing local knowledge and infrastructure requirements.

## Policy PFHP2 - Provision and Protection of Community Amenities, Policy PFHP7 – Well designed buildings and Policy ECP2 - Supporting the vitality and viability of centres

Working from home is now the norm, rather than the exception, with hybrid working now common. Wavendon Parish Council believes that MK City Council should reexamine their housing design and car parking standards to enable these modern and now well embedded working practices to be reflected in local policy, thereby adding value to the attractiveness and environmental benefits of MK as a place in which to live, work and prosper.

To conclude, Wavendon Parish Council endorses the following five overriding principles for development, namely the 5 C's of:

- Control of Planning at the local level
- Building communities not just building houses
- **Connectivity** (bus / train and integrated public transport services)
- **Communications** (notably broadband)
- And Certainty (Polices GS1 to 7, GS15, GS16, PFHP1 and ECP5)

Yours sincerely

Alan Kemp Clerk to the Parish Council