

DRAFT SOUTH EAST MILTON KEYNES - STRATEGIC URBAN EXTENSION DEVELOPMENT FRAMEWORK SUPPLEMENTARY PLANNING DOCUMENT CONSULTATION – Response Form

This form is provided to enable you to submit representations on the proposals set out within the draft South East Milton Keynes - Strategic Urban Extension Development Framework Supplementary Planning Document (SPD) by email or by post. Further information regarding the consultation is published online at:

<https://www.milton-keynes.gov.uk/planning-and-building/planning-policy/south-east-milton-keynes-strategic-urban-extension>

HOW TO REPLY

This form has two parts. Both parts should be completed:

PART A – Your contact details

PART B – Your response

Forms should be returned to Milton Keynes Council (MKC) **no later than 5pm on Monday 19 April 2021** by:

Email: SEMK@miton-keynes.gov.uk

Post: Development Plans Team, Growth, Economy and Culture, Milton Keynes Council, Civic, 1 Saxon Gate East, Central Milton Keynes, MK9 3EJ.

Further guidance on making representations to the draft South East Milton Keynes - Strategic Urban Extension Development Framework Supplementary Planning Document (SPD) consultation is provided in the following documents, which are available via MKC's South East MK :

<https://www.milton-keynes.gov.uk/planning-and-building/planning-policy/south-east-milton-keynes-strategic-urban-extension>

- Statement of Representations Procedure
- Guidance Notes for Respondents

If you have any queries about this process please contact the Development Plans team at the address above, via email at SEMK@miton-keynes.gov.uk or by telephone on 01908 691691.

PART A - CONTACT DETAILS

Please note that only your name and organisation name will be published. However, we require a full postal address in order to register your comment. We will not accept anonymous responses. If you are an Agent responding on behalf of a third party, please provide full contact details for the third party within Box 1.

BOX 1 RESPONDENT's details

| |
|---|
| Name: Lesley Sung |
| Organisation (if applicable): Walton Community Council |
| Position (if applicable): Council Manager – Walton Community Council |
| Address: MK Snap Building, 20 Bourton Low, Walnut Tree |
| Postcode: MK7 7DE |
| Telephone: 01908 694758 |
| Email: manager@waltoncommunitycouncil.gov.uk |

BOX 2 AGENT's details

| |
|--------------------------------------|
| Name: |
| Organisation (if applicable): |
| Position (if applicable): |
| On behalf of: |
| Address: |
| Postcode: |
| Telephone: |
| Email: |

PART B – REPRESENTATION

If you are making representations on more than section of the SPD please fill in a separate ‘Part B’ sheet for each representation.

Your representation should succinctly cover all the information and evidence necessary to justify your representation and/or any suggested changes to the SPD, as there will not normally be a subsequent opportunity to make further representations.

Where relevant please submit evidence to support your representation. Any supporting evidence can be attached to this form or submitted as a separate document.

1. Please state which part of the draft South East Milton Keynes - Strategic Urban Extension Development Framework SPD this representation relates to. (If you wish to make representations on more than one part please fill in a separate ‘Part B’ sheet for each representation)

See referenced sections.

2. Please provide your comments below and overleaf and (if applicable) state what change(s) are required to the draft South East Milton Keynes - Strategic Urban Extension Development Framework SPD and why: (please use additional separate sheets if required):

Representation on SEMK:SUE Draft SPD

Foreword

In this representation on the draft SPD, on behalf of its Residents, Walton Community Council (WCC) highlights its concerns about what is being proposed for this expansion area. Whilst the concept of expansion is not opposed, major flaws in the draft SPD are clearly evident. WCC address these issues in the form of 5 key themes in the sections that follow:

- Ethos of development
- Transport
- Infrastructure
- Site density and sensitivity
- Drainage and flooding

Representation on SEMK:SUE Draft SPD

Theme - Ethos of Development

SPD Section: 3.3 - Development Principles

In preserving and enhancing that which makes Milton Keynes unique, the planning ethos should be holistic, comprehensive and detailed. It will make the difference between a failed design experiment and a successful and sustainable, new developed settlement. We would wish for our future new neighbours in SEMK to enjoy the same benefits as those enjoyed elsewhere in MK particularly with regard to green open space, freedom of movement and life in safe, pleasant environment.

The proposed higher density could result in a decreased level of green/open space amenities. During the Planning Cabinet Advisory Group presentations, the planners proposed an overall density of 30 dph for SEMK. However, that reference has disappeared from the SPD and should be explicitly re-instated. The densities in the new development should also be commensurate to those present in existing settlements. This should not just apply to the villages but also to the adjacent areas of Walton Parish.

On transport planning, there is no evidence base to support any of the movement frameworks in the SEMK SPD.

- The affected section of the East West Railway is not due to take more trains until end of the decade, so there is no pressure on EWR to deliver any infrastructure solutions.
- East West Rail has promised a travel survey for years and there is no date for its delivery.
- East West Rail is only concerned with their rail line and not the needs of Milton Keynes.
- The Oxford Cambridge Expressway proposal is paused but has a new public body due to continue the work.
- The pandemic has changed travel patterns for the last 12 months and probably forever.

Therefore, without an evidence base, Milton Keynes policies must apply as follows:

- Proper linkage of SEMK to MK and for it to be a sound urban extension.
- The requirement for new developments to be self-sustaining and not devastate the adjacent areas.
- Adherence to policies for grid roads, redways, grade separation, sound and pollution buffering etc.

MKC are setting the bar so low by proposing sub-optimal movement frameworks. Financial viability should not be mentioned (as it is, twice in the document). It must not be the guiding principle. There should be no fall-back that allows developers an opportunity to provide a sub-optimal development, ignoring the needs of residents and those of the wider city, purely for the sake of higher profits. Lack of vehicular connections (bridges) will cut off communities, education and health care. The area will become an urban ghetto instead of an urban extension. This simply stores up issues for a later date and could be "built out" by applying the right ethos to the development **before** the first ground is broken.

The difference between what EWR, OCE and Developers claim they can afford, and what it costs to build the right answer is simply cash, and this **can be found**. Building the wrong movement network will destroy the quality of life here forever and **cannot be rectified**. We are Milton Keynes, only the best is good enough.

Theme - Transport SPD Section - 4.3 Movement Framework

As stated in the SPD, MK:SE should have the feel of a natural extension of Milton Keynes. It would be reasonable therefore to expect a continuation of the grid roads. This is also acknowledged in Plan:MK Policies CT2, A1, A2 & A3 and CT8 A, C & D as well as the Milton Keynes Transport Vision and Strategy LTP3 2011 to 2031. As this is a core principle of Milton Keynes and its planning policies, the SPD should explicitly require grid road extensions.

The H10 should be extended eastward to Newport Road (and then beyond to the A421/M1 J13). This provides free movement of traffic from the South East corner of MK and gives relief along the A421. This should not use existing access from Church Farm as this splits Byrd Crescent in two and has 'at grade' crossings – contra to Plan:MK section 8.47. The SPD should show Byrd Crescent clearly with grade separation on its maps and in the wording.

The V11 must be extended South, through the reserved corridor. Crossings at Holst Crescent and Morley Crescent must be grade separated. Without this, traffic is forced across to the A5 or V10, which faces the threat of closure at Bow Brickhill level crossing, instead of a recognition that it must remain open. Despite the V10 not being in SEMK, the impact from SEMK will be contra to Plan:MK Policy CT2 B. The proposed Woodley's Road must have a left turn to Woburn Sands, as there is no justification for building a compromised road connection. Plan:MK shows the way in Policy CT2, A6.

Grid roads provide more routing options, faster emergency service access, and give future proofing. (Plan:MK Policies CT1, A3 & A4 apply here and define the specification for a grid road, including grade separation, width, noise mitigation, etc.). The SPD states that providing these grid extensions would be too expensive for developers. This attitude shows contempt for MK residents and this wording must be removed from the SPD. All extensions must be implemented as per Plan:MK and developers tasked on how to finance it. As residents, MK is our city. Developers should serve our best interests, not purely their interests in profit.

All road crossings must be grade separated. That is, use underpasses and not zebra or traffic light crossings. It has been shown in Central MK near The Hub (not to mention Countess Way in Broughton) that 'at grade' is a disaster that increases risk of serious or fatal accidents. Lessons should have been learnt from these experiments – Plan:MK Policies CT1 A5, CT2 A4 & A6, CT3 A1 & A3 all apply here.

These points help mitigate the impact of, and ensure free flow of traffic to and from SEMK. All per Plan:MK section 8.48. It is thanks to the prior foresight of the original developers of MK, that we might soon be able to implement mass rapid transit. It is essential to keep that visionary approach. SEMK is a development to be integrated by its transport network into the whole of MK, not a ghetto cut off from both the villages and the City.

There are outstanding questions on EWR and the Expressway which need to be reconciled with Plan:MK (Policy CT7 D leaps out) alongside the development of SEMK. However, transport elements in the SPD, such as the implementation of MRT and integration of public transport with a relocated Woburn Sands rail station are laudable.

Theme - Infrastructure

SPD Sections – 4.2 Landscape and Open Space Strategy & 4.4 Land Use

The vision set out in the SPD cannot be fulfilled without the necessary infrastructure. The development area is large and has many touch points. Therefore, seeking the views of people local to the area will be important.

The green infrastructure plans should be delivered as described in the 'Open Space' section in 3.4 and 4.2.16 – 4.2.19 of the SPD. Section 4.2.3 & 4.2.24 concerning open space areas for play including minimum size, serving 600 metre catchment areas, separation buffer and checks for conflict with other green infrastructure functions should be adhered to and be detailed on future masterplans, so that these are visible and resonate to future infill.

Section 4.25 which references provision of 'Individual Neighbourhoods' should be properly considered and serve the need for multi-use games facilities. MK Council should ensure developers conduct **meaningful** consultation with councillors, parish councils and other stakeholders. Allotments and Sports provisions (sections 4.2.26 and 4.2.28) are vital to build a community and should be detailed on masterplans along with the area of the allocated space to ensure accuracy and provision.

The Focal Point Civic space should also be allocated and detailed on the masterplan. This site should be reasonably accessible to shops, schools, health, other local services and community facilities. The Community Hub should include retail and other facilities to meet local basic needs and should provide sufficient space and parking for a mix of uses.

SPD section 4.4.18 suggests a potential relocation of the Woburn Sands station. For the avoidance of further uncertainty in the master plan, this should be either confirmed, and if not, other measure be put in place. The existing Woburn Sands Town Centre facilities and retail provision is not of a scale and layout that would serve the needs of the new adjacent community, not least because of the insufficient parking space. These issues will inhibit the formation of a vibrant social environment. Retail and other facilities for the new development area must be provided **in** the new development area, and reliance on existing facilities should be minimised.

Both primary and secondary schools should be built **well ahead** of the house builds and before residents move in. (Other MK areas such as Whitehouse have managed their school intake). Provision of all schools places in the immediate locale must be available from the outset. Delays in the building of schools will create the need for 'school runs' to and from neighbouring areas, exacerbating the shortages of spaces in those already stressed establishments. Not least, these school runs will create a traffic nightmare, unless grid road extensions are implemented as we recommend.

Existing local GPs are already stretched and unable to take on any more patients. NHS provision needs should be assessed and an adequate number of GP practices based on population be provided. Similarly, dental practices are overstretched and NHS patient places often difficult to find. This too should be assessed and adequate facilities provided. Access for emergency vehicles around the new developments should be facilitated by design.

As outlined in Section 5.2, a specific strategy should be created and implemented to obtain developer contributions towards the necessary infrastructure and facilities mentioned.

Theme - Site Density and Sensitivity
SPD Section - 4.5 Character

SEMK should accommodate a mix of residential densities to provide for diversity and varying character across the site, with lower densities towards the edges of existing developments. These should complement the character of neighbouring areas. We expect the densities to be consistent with the surrounding developments, and for the original 30 dph blended average to be explicitly referred to in the SPD.

The higher densities planned are out of keeping and uncharacteristic for the neighbouring areas. In Plan:MK Policy HN1 section C it sets out “*Net densities of proposals for 11 or more new dwellings should balance making efficient use of land with respecting the surrounding character and context.*” The SPD proposal to allow a density of up to 50 dph on the southern side of the railway adjacent to the 30 dph of the existing settlements on the northern side of the railway in Old Farm Park is totally at odds with this policy.

Planned densities particularly on the boundaries, should be comparable with the densities of the existing adjacent settlements. 6 storey buildings in general should be avoided but if necessary, they should not be placed adjacent to 2 storey homes. Notably, the concept of high density dwellings surrounded by naturally surveyed open space is not in keeping with the traditional design ethos of Milton Keynes. More appropriate and sustainable would be an even spread of density and a more equitable allocation of open space. This is a matter of creating optimal standards for these future dwellings and not allowing the developers to pursue their aim of maximum concentration and higher profits per hectare.

Policy HN1 section C further states “*Higher density development will be encouraged in locations with good accessibility to facilities, that are well served by public transport, and where it can be accommodated by existing or improved infrastructure*”. SEMK will not be served with accessible facilities initially. With DRT replacing the non-commercially viable bus services, MRT not yet being available, public transport is inadequate. Having a railway station is not the answer in isolation. All this, combined with the severe lack of parking bays for residents in the higher density areas, demonstrates a clear failure of SEMK to adhere to Plan:MK.

Section “7. Homes and Neighbourhoods” sub-section 7.9 states “*Where higher densities of housing would support the establishment of improved public transport services, for example mass transit corridors, this will be encouraged, provided the quality of development is in line with the requirements of other policies within this plan and infrastructure can support greater concentrations of households in the area.*” As mass transit corridors have not yet been established, this cannot be used to justify higher density housing.

Theme – Drainage and Flooding
SPD Section - 4.6.8 Surface Water Drainage and Flooding

The development site will affect the tributaries to Caldecotte Brook and the adjacent flood risk areas comprising Old Farm Park, Browns Wood, Tilbrook and Caldecotte. Caldecotte Brook has in the past been subject to overflow and used to regularly cause flood damage to homes and property all along its length. Following a redesign of its terminus at Wadesmill Lane and appropriate interventions by The Parks Trust, this issue has been mitigated for a decade. The capacity of Caldecotte Brook is now barely adequate for the existing drainage load. The added drainage load from the new development may once again create an overload condition.

Lessons should have been learnt from the inadequate and inappropriate changes that were made to Caldecotte Brook when the Walnut Tree and Walton Park settlements were developed. The brook was diverted from its natural course to an underground course running under houses and into Caldecotte Balancing Lake. It should be noted that the inlet pipes are not wide enough to deal with the fast moving detritus that accompanies high water flow during heavy rain. The inlet is protected with a steel grid that can block under the certain conditions.

It therefore is imperative that Caldecotte Brook be treated holistically in the SPD to protect our residents from material damage from the new development. Ideally, an appropriate independent hydrological study should be made of the brook and its tributaries. This would:

- Determine its flow rate and water basin that terminates at Caldecotte Lake.
- Evaluate if the water table levels would be affected, and thus increase issues with subsidence.
 (An increase in subsidence of properties Walnut Tree has been noted since changes to the terminus of Caldecotte Brook were performed in 2008.)
- This hydrological study can be forward funded from S106 monies that can then be re-couped from developers via the roof-tax system and has been long standing common practice in Milton Keynes.

The SPD must include plans to mitigate the loss of porosity of the soil in the development site with appropriate water retention features such as Sustainable Urban Drainage Systems (SUDS) and balancing ponds. Balancing ponds can provide an opportunity for wildlife habitat but will need maintenance. So, the Parks Trust must be engaged as the premier land management agent in Milton Keynes.

Bedfordshire Internal Drainage, along with Anglian Water will be the experts on which systems will be best to store and slow water flow during risk periods. It should also be noted that during periods of high water flow the banks of the stream may suffer from erosion. This already poses a problem for residents in Ireland Close, behind Berwald Close in Browns Wood and Bourton Low in Walnut Tree.

The drainage and hydrological plans must be future proofed in terms of climate change and future development. Episodes of extreme weather are more likely and development along the tributaries outside of SEMK may impact the local hydrological basin. It is therefore essential that we do not opt to do “the bare minimum”, as retrofitting a proper solution will be far more costly.

3. Do you wish to be notified if and when the draft South East Milton Keynes - Strategic Urban Extension Development Framework SPD is adopted by the Council?

Yes

No

Data Protection Privacy Statement

We collect and use information about you so that we can provide you with services under The Town and Country Planning (Local Planning) (England) Regulations 2012 Legislation. Full details about how we use this data and the rights you have around this can be found at <https://www.milton-keynes.gov.uk/planning-and-building/development-management-privacy-notice-milton-keynes-council>. If you have any data protection queries, please contact the Data Protection Officer at data.protection@milton-keynes.gov.uk.

Signature

Lesley Sung

Date

March 2021