



The Civic Society For Milton Keynes

SOUTH EAST MILTON KEYNES STRATEGIC URBAN EXTENSION

DEVELOPMENT FRAMEWORK SUPPLEMENTARY PLANNING DOCUMENT

**A Response to
Milton Keynes Council's
Consultation Draft**

April 2021

INTRODUCTION

1. The consultation upon the SPD for South East Milton Keynes (SEMK) is being undertaken at a time when there are uncertainties around two major infrastructure projects that will affect, not only the residents of the SPD area, but also the considerable number of existing residents both within the “New Town” area of Milton Keynes and Woburn Sands and its environs:
 - a. The abandonment of the Cambridge-Milton Keynes-Oxford Expressway on 18 March 2021 in favour of “more targeted, localised road improvements”, whilst welcomed locally, gives rise to significant uncertainty about how traffic will move around the local and wider areas.
 - b. On 31 March East-West Rail published a consultation document that posits a number of alternative solutions to how vehicles and pedestrians will cross the railway line between Woburn Sands and Caldecotte and is seeking responses by 9 June 2021. The consultation explains that the closure of level crossings is expected to be required (regardless of the service concept eventually selected) as the frequency and speed of new services would make crossings less safe than they are today. The progressive replacement of level crossings with bridges and underpasses is Government policy in the UK but, in SEMK, it could mean considerable delays for road users. Hence, our response to the draft Development Framework consultation is predicated on the basis that all level crossings within the SEMK SUE and within Woburn Sands will all be closed.
2. We are conscious that substantial delays with this SPD to resolve the transport issues could result in unacceptable pressure upon the Council from the developers of the land within SEMK and issues around the Five Year Land Supply. We therefore feel that it is vitally important that, alongside the SPD, the Council begins urgent, cross-border discussions with the adjoining local authorities with a view to producing a bold co-ordinated plan for the southern boundary area of Milton Keynes as a matter of urgency to give comfort and certainty to residents and developers about development and connectivity. To do nothing will run the risk of creating an incoherent area of development that will reflect poorly upon all of those involved.
3. We feel that the vision expressed within the SPD is not bold enough in setting out the type of place that SEMK could become: there are no grand aspirational statements, for example: we have suggested some below.
4. There is no indication as to how SEMK sits within the context of planning consents that have already been granted but not necessarily implemented, or indeed the developed ‘city’ area of Milton Keynes – such plans are vital and should be produced as a matter of course.
5. Whilst we understand, in part, the reasoning for wishing to present alternative scenarios in respect of E-W Rail, we think that it produces wasted, contorted discussion, particularly in view of the consultation proposals published during the consultation period for SEMK. We think that it is far better to clarify the best solution for residents of SEMK and the surrounding area and produce coherent arguments about why they should be adopted: we aim to do this in the later section “E-W Rail”.
6. We are concerned that the public consultation has been undertaken during the Covid-19 Pandemic when the usual form of consultation events, such as public meetings, drop-in sessions etc cannot take place. We were pleasantly surprised at the popularity of our online consultation event that took place on 17 March 2021 and for which we had to turn away potential attendees because we had reached the 100 person limit for our Zoom account – this, we understand, far exceeded the numbers at the two Council organised events.

It is clear to us that there is considerable local interest in the development of the area and we think that there would be a benefit in having a second round of limited consultation once the initial comments on the SPD have been assessed by the Council. We do not think that it is appropriate that all subsequent “discussion” has to occur in the Council Chamber where members of the public only have limited speaking

rights.

7. To make things more understandable we use the following nomenclature throughout this document for areas within SEMK:
 - a. (*H10 North*) – the small parcel of land north of the proposed H10 and east of Phoebe Lane, Wavendon.
 - b. (*Railway North*) - the land north of the railway line and south of H10.
 - c. (*Railway South*) - the land south of the railway line and north of the existing Bow Brickhill/Woburn Sands Road. It is split into two sections – *Railway South (West)* and *Railway South (East)* by V11.
 - d. (*H11*) – the proposed east-west road running through *Railway South (West)* - we note that this is referred to in the SPD as “Bow Brickhill Road” but given that, as above, it is referred to as “Potential Expansion of the MK Grid” it provides clarity of thinking to give it a Grid Road designation and number.
 - e. (*The Boulevard*) – the proposed east-west road running through (*Railway South*) between V11 and Woodleys Road. It is variously described as the “Primary Street” (Fig 4.4) and the “Primary Residential Street’ (Fig 4.8).

GENERAL COMMENTS

1. We are concerned about the lack of context information within the draft SPD. There is no information on the plans about existing planning consents that have been granted for the land east of Old Farm Park and Church Farm, Wavendon – we cannot see road patterns, detailed open space structures and the location of facilities such as local shops and schools, for example. There is no information about sites further afield that will also impact upon SEMK eg Eaton Leys, South Caldecotte etc.
2. We are concerned about the lack of clarity of the information presented upon some of the plans eg Fig 3.1:
 - a. Eg Fig 3.1 a) does not distinguish between existing and proposed grid roads and b); has two differing types of open space: “Multi-functional Landscape Buffer” and “Linear Open Space Network” where one (“Open Space”) would be a sufficient description
 - b. The cross sections in Fig 4.5 and 4.6 refer to, we think, Woodleys Road alone.
3. There was concern expressed at our meeting about the potential location of the Gypsy and Travellers’ Site. Such sites are emotive and we feel that it is vitally important for the Council to provide local residents with feedback about the operation of the existing sites within the Borough to give context and, hopefully, allay their concerns.
4. We note that the “Multi-Functional Landscape Buffer” to the west of Woburn Sands is a policy carried forward from Plan:MK, whilst recognising that there is no specific requirement upon its width or design. We would query its practical purpose and whether it represents the best use of open space within the proposed development area. It is perfectly appropriate that there should be a landscape strip of grid road character between Woodley Street and the western edge of Woburn Sands but we would query whether it is appropriate to widen it to fulfil some form of additional recreational purpose. We consider that it would be better to reallocate the space thus saved into the general open space network with the SEMK development area.
5. It would be helpful to understand land ownerships within the SPD area as well as other legal matters that will affect development – such as the current Works Order for the Marston Vale Line. Knowledge of such matters is a key part of being able to assess the deliverability of the overall proposals and it is important for the community to understand this at the earliest opportunity.
6. We wholeheartedly support Policy SD10 of Plan:MK which requires that planning consents will only be granted following approval of a comprehensive development framework. However, the development of Milton Keynes East is subject to the same requirement and we understand, from our recent discussions with Berkeley Group that they are planning to bring forward a planning application for only land within their own control. Such a situation should be strongly resisted in SEMK – we need clarity about the whole plan and its deliverability.
7. The open space network within SEMK should be planned so that it enables a multitude of route options and circuits around the area, particularly for those taking exercise such as dog walking, jogging and walking. Such routes should extend into the Brickhill woods, which is a vital component of the open space network for this area.
8. There should be a requirement for the provision of land for custom-build housing, in line with Government requirements.
9. The document gives scant attention to the character of the four differing areas within the SPD that will generate different design solutions viz (*H10 North*); (*Railway North*); (*Railway South-West*) and (*Railway South-East*): accordingly we suggest that an indicative density (in terms of dwelling numbers) should be set for each. We suggest that the areas could have the following development characters:

- a. (*H10 – North*): This is an isolated area that, in many respects, might be better serviced from either Phoebe Lane or the Church Farm development area to the west, but this is dependent upon access across land owned by others. If it is to be serviced from H10, as per the SPD, then we suggest that it could be designed to have its own environment eg via advance planting of trees around the boundary so that the eventual development can have the appearance of housing in a woodland clearing. The site will need to provide a footpath/redway to enable residents of Wavendon village to have access through the land and into the wider SPD area, which would include the provision of a grade separated crossing of H10, once it is built.
- b. (*Railway – North*): The development pattern should continue the one already established through the parkland from Old Farm Park and be centred around a generous open space link. The alignment of Phoebe Lane should be reinforced to provide a strong link into, and through, the SPD area for the residents of Wavendon: for example, residents of SEMK should be able/encouraged to walk or cycle to The Stables.
- c. (*Railway – South (West)*): This parcel of land has similarities with the stretch of H7 between Woughton-on-the-Green and Woolstones (albeit at a reduced scale), with development on one side and open parkland on the other. We suggest this pattern is amplified with the land to the south of (*H11*) having the appearance of a traditional English landscape park of the era of Capability Brown, setting the scene for Brickhill Woods. The area north of (*H11*) could be based around a frontage distributor road.
- d. (*Railway – South (East)*): The development of this area will form the major impression of SEMK and we suggest the following:
 - i. The images for Woodleys Road shown on p53 illustrate a desolate character rather than an enjoyable place in which to live. They run contrary to the general principle of the development of MK in which residences are shielded from traffic with dense landscaping and it produces a poorer environment for residents. We are not convinced that such a solution is necessary in this area.
 - ii. We are concerned that the image for (*The Boulevard*) shown on Fig 4.8 does not address the whole issue of creating a pleasant environment that accommodates public transport, parked vehicles, vehicular access to dwellings for residents and visitors together with opportunities for substantial street trees. It raises the spectre of the creation of a much-derided “City Street”. We think that the approach needs to be rethought.
 - iii. We think that (*The Boulevard*) should be a substantial, landscaped street in which, in due course, the trees will dominate the buildings, as with the boulevards in the places such as Conniburrow - see image below. The alignment of (*The Boulevard*) should be such that it is, in broad terms, equidistant from the development on either side to maximise the potential use of public transport.
 - iv. The eastern side of the intersection of (*The Boulevard*) and V11 should take the form of a formal town square with the buildings – shops, schools, workplaces and health centre etc forming the perimeter – Two Mile Ash Local Centre is a good example of the way that differing buildings can be combined to give form and enclosure to such a disparate range of uses. Parking should not predominate the urban scene (see eg Shenley Church End Local Centre as a good example of how to control this).
 - v. Buildings along (*The Boulevard*) itself should scale down in height from the Local Centre (maximum four stories) to the east, and in density from west to east.



Conniburrow Boulevard, Conniburrow

10. We are concerned that housing density within SEMK will be too high and that the amount of open space will therefore be inadequate. Such space must be more than narrow corridors respecting its proximity to the Brickhills, and must open into broad areas of landscape, in line with the general “strings”, “beads” and “settings” principles that underpin the design of the MK park network. As proposed, the layout would be all “strings” with no “beads” (apart from play areas and unwalkable SUDs features) and thus lack attractive, broad landscape “settings”.
11. The density of development should generally increase towards the railway station. We are concerned that the area around the station is beginning to look a little congested – with a station, local centre and primary school and the need to accommodate the lengthy inclines to the bridge – it will need a detailed study at an early stage.
12. There is no reference within the document to the Green Agenda and the Council’s wish that MK is to become the “Greenest City on the Planet”. We suggest that the eventual developers should be challenged upon this by consideration of matters such as the following:
 - a. SEMK will be a no-gas development unless hydrogen becomes a viable option;
 - b. Houses are all built to Passivhaus standards to avoid upgrading almost on completion;
 - c. SEMK will be a no-concrete site, with alternatives used for foundations (screw piles), and all other materials using concrete;
 - d. SEMK will be a no-plaster site, with alternatives to plasterboard etc.
 - e. The use of other materials will be scrutinised so that especially harmful ones are not used;
 - f. The use of plastic should be minimised.
13. There is little description of the type and quality of open space that will be required and we think that greater detail is required as to what is expected from each:

- a. Links through (*Railway North*) from Old Farm Park and Church Farm: We are concerned that the provision of SUDS areas can often be used as an excuse to reduce the amount of usable open space that would otherwise have been provided. Whilst SUDS areas are important features, the restrictions upon their design imposed by their function mean that they are not necessarily the most attractive components of an open space network. All SUDS areas should therefore be seen as “extra” to the amount of open space that would otherwise be provided and not an excuse to reduce the amount of usable open space within a development area. The links should be a broad, generous space (of a similar scale and character to the open space running east-west through Browns Wood, south of Britten Grove), and not as narrow as the more easterly section of Caldecotte linear park running through Old Farm Park, or as narrow as linear parkland approved for Church Farm Wavendon.
- b. Woburn Sands Lake (ie the private angling lake west of Drayhorse Crescent): It is important to know the status of the lake and whether it will be available for general use and enjoyment by local residents. It is our understanding, from speaking to the resident angling club, that they wish to remain *in situ*. We understand that the lake is a deep former brickpit and that it needs to be kept securely fenced because of the inherent dangers to the public. Unless there is to be general access, we think that it is deceptive to include it within the SPD area without some form of designation to show its status.
- c. Railway borders: The SUDS should be used as an opportunity to create a linear feature (with permanent wetland, if possible). The sides of the SUDS should be carefully profiled with gentle gradients as both a safety feature for young children and to avoid the appearance of “bomb craters”. Development along this route should be orientated to provide natural surveillance – there should not be runs of back garden fences.
- d. North south link to Brickhill Woods: This is a major opportunity for a significant landscape link in and out of Milton Keynes. The image of a “corridor” shown on the Concept Plan (Fig 3.1) is inadequate. At its heart, should be a significant and broad public space to act as a natural focus for the local community and its events. The Local Park in Two Mile Ash is a particularly good example of what can be achieved, whereas the north-south link through the western part of Monkston is inappropriate for this location because it does not have an appropriate scale. Crossing the link should form a significant “event” for people travelling along east-west through the area.

14. We are concerned at the use of the phrase “Community Hub”, which first appeared in the SPD for Milton Keynes East. It introduces a new phrase (without definition) that does not appear in the retail hierarchy within Plan:MK and we think that this can only lead to confusion and therefore needs to be changed. We feel that it is perfectly adequate to term such developments as “Local Centres”. They are “community hubs” by virtue of what they are but there is no definition anywhere as what differentiates a “Community Hub” from a “Local Centre”. Is the eastern Local Centre (which will contain shops, a school and a railway station) is any less of a “community hub” than the Local Centre at the junction of V11 and (The Boulevard)? In scale perhaps “yes”, but in general function “no”. Looking inside MK itself, which Local Centres would now be deemed “Community Hubs”? Surely most, if not, all and such an exercise would become necessary at the next revision of Plan:MK. If a differentiation is being sought, then “Major” and “Minor” Local Centres is better. It would be helpful to have a general indication of the maximum permitted commercial floorspace in each.

15. We support the proposed relocation of Woburn Sands Railway Station but we think that more work needs to be done to understand the levels for the road as it crosses the railway line and how it will impact upon nearby buildings and access to the development land either side.

16. As with our earlier comment on H11, we think that it would be helpful to rename Woodleys Road as V12 – given that it will appear, to all intents and purposes as a Grid Road, albeit at a smaller scale.

17. We think that there should be a general statement upon street trees and the amount that are to be provided together with some typical cross sections of road verges to demonstrate that the space will be of sufficient width to enable larger trees to grow to full size. The matter needs careful consideration to ensure a) that trees are appropriate for the designed spaces and b) that suitable spaces are left for the provision of large trees that provide not only visual beauty but shade and the ability to modify humidity.

SPECIFIC COMMENTS

We have the following specific comments and questions upon the documentation:

General	<ul style="list-style-type: none"> The document will need to be amended to note the abandonment of the Expressway and the commencement, content and preliminary nature of the East West Rail consultation. The document should be consistent in its use of SUE or SEMK, both of which are used interchangeably throughout, and apparently at random eg para 2.3.1 (SEMK) and 2.3.2 (SUE). We suggest that SEMK is used throughout.
1.7	There is some stray wording on the top left-hand corner of the inset map
Add new S2.12 and renumber existing section S2.12 as S2.13	<p>“S2.12 LAND OWNERSHIP</p> <p>Land ownership and the restrictions on land use imposed by the current EWR Works Order are vital components in the delivery of the overall plan and, in assessing planning proposals in accordance with Plan:MK Policy SD10, it is important to understand the feasibility for completing the development in accordance with the proposals. The submitted comprehensive development framework should therefore indicate the ownership of all land within the plan area and the nature of any agreement between the development parties”.</p> <p>Comment: See General Comment 6 above.</p>
2.3.11	<ul style="list-style-type: none"> Third bullet point: The Woburn Sands road does not have an “<i>unrestricted</i>” speed limit – it is subject to national regulations, and a reduction in speed limit to 50mph, or even 40mph, would be appropriate. Fourth bullet point: The wording implies that the railway line is protected under Policy NE1.
2.7	The reference to “Redways” on p29 is incorrect: we suggest that it is amended to “Within Milton Keynes there are shared paths for cyclists and pedestrians which have a red surface and are known as Redways” .
2.11	Add to end of third bullet point: “although, for amenity purposes, we expect that they will be buried during the course of the development” . Comment: This is a simple matter of amenity.
2.12	Amend wording of second bullet point to “Existing hedgerows should be retained and strengthened to reinforce their importance as part of the local landscape for visual and biological diversity reasons. They should be used as structuring elements in the overall planning of sites and their removal will only be permitted to accommodate roads, infrastructure or wider open space elements such as playing fields. All hedgerows thus lost should be replaced by equivalent lengths of new hedgerows within the overall development area. To ensure their long term maintenance, hedges should be incorporated within the public realm where practicable. All hedges within private ownership should be protected by suitable restrictive covenants within the land sale documentation” . Comment: Hedgerows are an important component of the local landscape and important for biodiversity.
3.1.8	Add following wording: “There should be appropriate provision, at the outset, to ensure that new residents are able to form strong community links either through the provision of temporary facilities until permanent ones are available, or by associating with existing groups and organisations in the local area” . Comment: We are concerned that community provision is too often overlooked in the development of new areas and developers should be encouraged to work with organisations such as Community Action:MK and the Milton Keynes Community Foundation.
3.2	<ul style="list-style-type: none"> Delete first two sentences and replace with: “SEMK will become a thriving new community set within a lush landscape with significant planting of forest scale trees that extends the Brickhill Woods into the Milton Keynes urban area. It will feel an integral part of the wider city enjoying the same excellent levels of amenity, open space provision and connectivity as the rest of Milton Keynes”. Delete second paragraph.

	Comment: It is wrong to think of SEMK as an “extension” of Milton Keynes as this implies that it could somehow be something different – it has to be seen as an integral part of the whole, albeit that it might have a different character. The “Vision” has to be bold and reinforce the landscape connection.
3.3.1	<ul style="list-style-type: none"> • This has been misnumbered – it should be 3.1.1. • See comments above about the use of “extension”, landscaping and the green buffer. There has to be a bold vision to create an exceptional place.
Figure 3.1	The plan is one of those which would be considerably improved with the inclusion of details of the adjoining development - see General Comment 2 above.
Movement Scenarios 1-3	We think that these are in the wrong place within the document – their current positioning only serves to obfuscate the arguments. It is necessary to separate the general design principles for the infrastructure from the alternative scenarios to enable people to understand the arguments. Pp 53-55 are critical to the planning of the whole area and need to be treated separately.
Add new S4.3.8 and renumber subsequent paragraphs accordingly	“(The Boulevard) will form the major impression of SEMK for visitors and residents. It should have the character of a lush tree-lined avenue akin to the boulevards in the gridsquares surrounding CMK, giving the impression of buildings set amongst trees. It should be a non-frontage road to permit smooth movement of vehicles and public transport (whilst discouraging speeding) and all vehicular access to the buildings should be via parallel service roads or side roads”.
4.4.9	Insert new second sentence: “The retail uses with the (Local Centre) should not be of a scale that will compete with the shops in Woburn Sands”.
Figure 4.4	The redway along V11 should be on the east side rather than the west to provide better access for the residents of SEMK. There should be a proper redway link at the intersection of V11 and <i>(The Boulevard)</i> .
5.1.2	Policy SD10 (see above) makes it clear that “planning permission will only be granted....following the approval...as a whole”. Therefore “...are likely to be refused” should be replaced with “...will be refused”.
5.1.4	<p>Add new first bullet point: “The production of a co-ordinated structure plan including, but not limited to, precedent examples, identification of development parcels, indicative housing numbers, price ranges, landscape features to be both provided and retained, retail and other facilities to be provided, accompanied by a draft programme for development of the entire area”.</p> <p>Comment: In briefing sites within gridsquare structure plans MKDC worked on a basis of Starter/Low/Medium-Low/Medium high/High/Very High, with the boundaries being updated as and when appropriate. We suggest that it is possible for developers to adopt a similar formula here, being updated to take account of social housing. It helps people understand how an area is to be developed.</p>

EAST-WEST RAIL

During the SEMK consultation period East West Rail has published their own (informal at this stage) consultation for the stretch of railway line east of Bletchley. It aims to close all of the current at grade crossing points and posits various suggested alternatives. We believe that the decisions around each location should be based upon the best provision of connectivity to MK and the adjoining land for both residents and visitors alike. These are our views upon the questions posed by the consultation (from west to east):

1. V10 (Bow Brickhill Level Crossing): The V10 is a major point of entry into MK but, in Grid Road terms, it becomes a secondary route as it proceeds northwards due to it being single carriageway (albeit with dualling options) and intermittent roundabouts. The most logical bridge option was the one left by MKDC which has now been severely compromised by the sale to Red Bull of the land that was reserved for the bridge approaches. All of the E-W Rail alternatives being investigated to determine their feasibility are clumsy and inelegant in the way that they would accommodate traffic entering and leaving MK. If a bridge is to be built, we would suggest that the original "MKDC alignment" is far superior and should be used for either a bridge or a tunnel. We appreciate that it requires strategic rethinking but we would see no reason why the Red Bull parking requirement could not be reallocated in the immediately adjoining area to the west of V10 with a suitable crossing to the main campus.
2. V11 (Browns Wood Level Crossing): In contrast to V10, V11 is the major road on the eastern side of MK and is dualled for the majority of its length (from H10-H6). We believe that this crossing is vital and that V11 should be extended as a dual carriageway across the railway line from H10 southwards to meet the new (H11) to be built as part of SEMK, thus providing an alternative to V10 and the Bow Brickhill Level Crossing. The new bridge should accommodate a redway.
3. Pony Level Crossing: This is an essential part of the movement network to connect MK to the Brickhill Woods. It would seem that an underpass is the most appropriate form of crossing but it would need to be designed to a broad width and with splayed ends to offer the maximum security for users. It should be designed of sufficient height that horseriders do not need to dismount to use it.
4. Woodleys Farm Level Crossing: Unless there is an occupational need to keep this open to accommodate the residents of the Farm, we would have no objection to its being closed as it would otherwise seem to offer no particular benefit to the residents of SEMK.
5. Fisherman's Path Footpath Level Crossing: As with Woodleys Farm above, we have no objection to closure unless it is fulfilling a requirement of which we are unaware. We would, however, suggest that, if both this and the Woodley's Farm Crossing are to be closed, they should be replaced with a single pedestrian/redway crossing between the Pony Level Crossing and the new Woodleys Road bridge.
6. Woburn Sands Road Level Crossing: There is no easy solution to this crossing and the alternative road proposals all bring their own level of problems by diverting traffic into the existing streets of the town. We support the general principle of closing the level crossing but such a decision should only be taken against a full review of the way that traffic moves around the whole of the local area as far as Woburn and M1(J13) so that as much through traffic as possible is removed from the A5130 through Woburn Sands.
7. Woburn Sands Station: We support its relocation westwards into SEMK where it can have car park to enable travellers to use the train as a convenient alternative to travel into CMK and elsewhere
8. There should be an additional crossing for the Woodleys Road west of Woburn Sands, as shown in the SPD.