

**Matter 5, Issue 3 - South East Milton Keynes (SEMK) (Policy SD13
Response on behalf of The Raven Group**



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Issue 3—South East Milton Keynes (SEMK) (Policy SD13)

Q5.17

As noted in the representations submitted on behalf of the Raven Group at the Regulation 19 Stage, they are entirely supportive of the principle of the SEMK strategic allocation. In this regard Plan:MK is considered to be positively prepared with the SEMK strategic allocation being a sustainable and appropriate element of the Council's strategy for meeting its housing target over the Plan period. It's inclusion as a key aspect of the spatial strategy has been suitably justified in the supporting text and in the evidence base, including the Sustainability Appraisal and the Housing Supply Topic Paper.

The Raven Group's concern, outlined in their previous representations, related to the failure to include their land fronting Newport Road (A5130) within the allocation area. This has subsequently been addressed through PM40, with further comment upon this made in respect of Q5.18 below. However, suffice to say, without that modification The Raven Group would not consider Policy SD13 to be justified as it could not be considered to be the most appropriate strategy of the reasonable alternatives.

Q5.18

The Raven Group's objection to Policy SD13 in their representation at the Regulation 19 Stage was in direct response to the failure to include their land fronting Newport Road (A5130) within the allocation. They are therefore entirely supportive of PM40, which proposes their land now be included, and would stress that without this change Policy SD13 and the SEMK strategic allocation cannot be considered sound on the basis it would not be justified as will be explained below.

The schedule of proposed modifications acknowledges that the inclusion of The Raven Group's land would 'enable a more comprehensively designed scheme to come forward'. Indeed, the land in question provides a significant opportunity to create connectivity between the SEMK urban extension and the existing settlement of Woburn Sands, be that a designated pedestrian and cycle link, a vehicular route, or both, as illustrated on the enclosed constraints, opportunities and development principles plan. This is particularly important due to the location of the existing Woburn Sands railway station to the

immediate south of The Raven Group's land, meaning a route across it will become a strong pedestrian and cyclist desire line for those in the northern part of the urban extension.

As noted in the previous representations for The Raven Group, Policy SD1, in discussing place-making, outlines the importance of new development allocations being well connected to adjacent areas, shops, facilities and public transport. The failure to include The Raven Group's land in the SEMK allocation would be counter-intuitive and contrary to this principle as it would leave a barrier between the new housing and Woburn Sands and particularly the station, meaning that a crossing would be required over the railway line to the south, or a prohibitively circuitous route to Newport Road to the north and the strategic allocation could not be considered the most appropriate of the reasonable alternatives when The Raven Group's land is clearly available having been actively promoted for housing.

The inclusion of The Raven Group's land in strategic allocations also allows the potential for vehicular access from Newport Road to serve either their land in isolation or a wider number of units if that were considered appropriate in both design principles terms and following traffic modelling.

As indicated on the enclosed constraints, opportunities and development principles plan, the development of this parcel of land would also facilitate public access to, and the future management of, a sizeable area of existing open space at the southern extent of The Raven Group's land holding. This would benefit both future residents of the housing built within the strategic allocation and existing residents of Woburn Sands given the position of the open space and as it is currently not lawfully accessible to members of the public.

The part of the site indicated for residential development on the constraints, opportunities and development principles plan would be well related to Woburn Sands with the western boundary of the land following the alignment of built development to the north and south and the eastern boundary fronting onto Newport Road. Subject to any decision taken over the relationship between the strategic allocation and Woburn Sands the site could either be developed in a manner so as to provide a key linkage between the two at the point they connect, or if the intention is to try and maintain a physical separation between them through strategic landscaping it could be developed as integral to Woburn Sands, with the landscaping positioned adjacent to its western boundary between it and the rest of the allocation area, but with pedestrian and cycle links through it, as noted above.

In either case development would be in a form sensitive to the character of the existing settlement. Key design principles on the enclosed plan include:

- Vehicular access taken from Newport Road;
- Dwellings set back from the Newport Road frontage reflecting the pattern of development on the opposite side of the road and allowing the majority of the existing hedgerow to be maintained;
- A pedestrian and cycle route/corridor incorporated between the western boundary and Newport Road on the desire line to Woburn Sands station;
- Allowance made for on-site play area;
- Allowance made for surface water attenuation features/SuDS;
- Potential for vehicular access into the wider Policy SD13 urban extension incorporated in case this is considered beneficial; and
- Existing hedgerow on western boundary maintained except where required for access to wider allocation.

The position of The Raven Group's land at the juxtaposition between Woburn Sands and the strategic allocation means it could be developed as an early phase independently from the rest of the allocation site, but with appropriate contributions made to side-wide infrastructure in accordance with the development framework being prepared (See response to Q5.21). The site's relationship with Woburn Sands and proximity to the existing services and facilities there, including the station, means it is a highly sustainable location and an obvious first or early phase of development.

The Raven Group have recently agreed terms with Linden Homes for them to prepare an application for the site and technical work relating to matters such as access, surface water drainage, utilities, ecology and arboriculture is underway, with no significant constraints noted. An application, which would possibly be a hybrid with detailed consent for the first phase and outline for the remainder of the land, could feasibly be submitted in the 4th quarter of 2018, with completions anticipated by the 3rd quarter of 2020.

Q5.19

Whilst it is for other parties and the Council to comment on delivery expectations from the wider strategic allocation, as noted in the response to Q5.18, The Raven Group have secured an end developer for their parcel of land in Linden Homes, who has already commenced the technical work to inform a future planning application for it as a first or early phase of the strategic allocation and with no obvious impediments to development encountered.

It is acknowledged that contributions will need to be made to the wider infrastructure necessary to serve the strategic allocation and that the detail on this will become clearer as the development framework is progressed, however, it is anticipated that following

submission of a hybrid planning application in the 4th quarter of this year completions could be realistically expected by 3rd quarter 2020. Initial design works suggests in total the parcel could yield around 120 dwellings, which could all be completed by 1st quarter 2022.

This would mean the delivery of houses as part of the strategic allocation slightly earlier than the latest trajectory published by the Council, which given the projected step up in completion rates required to meet Plan:MK's overall housing target, can only be seen as positive and reinforces the importance of the allocation area being amended in line with PM40 to include The Raven Group's land, particularly given its inherently sustainable location in close proximity to existing services and facilities in Woburn Sands, which makes it an obvious early phase.

Q5.20

Again, it is largely for the Council and the other parties promoting the majority of the strategic allocation landholding to respond to this question, however, The Raven Group would point out that neither of route options B or C for the Expressway would cross its landholding and would not therefore prevent its early delivery as suggested in the response to Q5.18 and Q5.19.

Q5.21

This question is principally one for the Council to respond to, however, The Raven Group would stress the need for a flexible approach to be taken to avoid hindering opportunities for early delivery of phases of this strategic allocation where it is feasible, which will be important if the housing yield of 3,000 dwellings is to be delivered over the Plan period.

Policies SD12 SD13 (as amended by PM38) set out a requirement for a development framework to be prepared for the strategic urban extension and that this should cover infrastructure delivery, which seems sensible. In order to facilitate the delivery of early phases of the SEMK strategic urban extension, the development framework for it, which is already being prepared by the Council, should set out a clearly when allocation-wide infrastructure is required and set out a mechanism for determining contributions from early phases of development.

Q5.23

This is primarily a question for the Council and the promoters of the larger landholdings within the strategic urban extension, however, as outlined in the response to Q5.18 in

particular, The Raven Group's land is deliverable as an early phase of the scheme with Linden Homes having commissioned technical work to inform a planning application that will be ready for submission in 4th quarter of 2018. It is also a very sustainable location for an early phase, given the close proximity to existing facilities and services within Woburn Sands, including the railway station.

The development of this parcel of land would facilitate connectivity between the wider strategic urban extension north of the railway line and Woburn Sands for pedestrian and cyclist and also vehicles if the latter is deemed appropriate in design and traffic modelling terms, which will be important in development of further parcels of land north of the railway line by provide access to existing services there and importantly the station. This highlights the importance of The Raven Group's land being included in the SEMK urban extension as indicated under PM40.

Q5.24

The Raven Group do have concerns over some of the amended text in Policy SD13 suggested in PM38. Whilst the amended wording after "A" relating to the corridor for the Oxford Cambridge Expressway (OCE) is preferable to the previous text, which would have unnecessarily delayed the granting of planning permission for any land within the urban extension until 2019/20, there is still concern that the approach proposed is too rigid. If the chosen corridor for the OCE does end up being routed through the SEMK urban extension this would not constrain the entirety of the allocation area given its size and there will be parcels of land, such as The Raven Group's, site fronting onto Newport Road, that do not need to await the confirmed route as they could be safely developed without any concern the OCE will be a constraint. The current wording of the text in PM38 could therefore delay delivery of development on such parcels without justification as should be modified accordingly.

In respect of the infrastructure requirements at "B1" noted in the response to Q5.21, so as to facilitate the delivery of early phases of the SEMK strategic urban extension, the development framework for it, which is in the process of being prepared by the Council, should set out clearly when allocation-wide infrastructure is required and a mechanism for determining contributions from early phases of development.

The requirement at "B2" to ensure the development is well connected with public transport services reinforces the point made in response to Q5.18 that the urban extension must include The Raven Group's land as indicated in PM40 in order to provide connectivity between the northern part of the urban extension and Woburn Sands station.

As also noted in the response to Q5.18, there would be no conflict with the requirement in

"B3" to prevent coalescence between the urban extension and Woburn Sands from the inclusion of The Raven Group's land. As illustrated by the enclosed constraints, opportunities and development principles plan, it relates well to Woburn Sands and would effectively follow the line of built development created by Frosts Garden Centre to the north and the development on the former Nampak site to the south.

Development of The Raven Group's land would read as part of Woburn Sands and would not prevent a green buffer/structural landscaping/strategic green infrastructure being located adjacent to its western boundary, providing visual separation between Woburn Sands and the remainder of the urban extension. It would also facilitate the opening up the sizeable area of existing open space at the southern extent of The Raven Group's land holding for public access. This would benefit both future residents of the housing built within the strategic allocation and existing residents of Woburn Sands given the position of the open space and as it is currently not lawfully accessible to members of the public.

Q5.25

As noted in the answers to Q5.18 and Q5.24, development on The Raven Group's land would read as part of Woburn Sands given the extent of frontage on Newport Road and its relationship with the existing Frosts Garden Centre to the north. Furthermore, it would not breach the existing building line to the west created by the Garden Centre and housing to the north and would also align with that to the south created by the development on the former Nampak Site.

It would also not conflict with any potential green buffer/structural landscaping/strategic green infrastructure located adjacent to the western boundary of Woburn Sands to protect the settlement fringe and provide visual separation between it and the urban extension.

Q5.29

With the inclusion of The Raven Group's land, as indicated by PM40, then the SEMK urban extension is capable of being delivered in a manner envisaged by Plan:MK, although as noted in the response Q5.24, the precise wording of Policy SD13 should be amended to allow early phases to come forward where feasible.

Without the inclusion of The Raven Group's land it would not be true that the SEMK urban extension could be delivered in a manner envisaged by Plan:MK, as it would lead to there being a barrier between the urban extension to the north of the railway line and the existing facilities in Woburn Sands and particularly the railway station there, which would be contrary to one of the specific criteria of Policy SD13.



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Notes

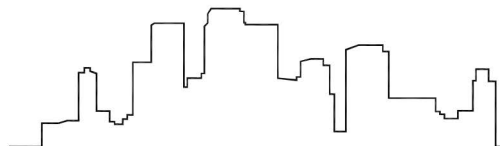
1. Contractors must check all dimensions on site. Only figured dimensions are to be worked from. Discrepancies must be reported to the Architect or Engineer before proceeding. © This drawing is copyright

KEY:

- Site Boundary
- Residential Development Parcels
- Potential Cycle / foot Path Connection
- Public Right of Way FP 002
- Potential vehicular opening off Newport Road
- Proposed Private Drives
- Proposed Adoptable Roads
- Potential Vehicular Cycle and pedestrian connections
- Connection to Woburn Sands Railway Station
- Proposed Trees / Vegetation
- Existing Building line setback North-East of Newport Road
- Possible Building line Setback South-West of Newport Road
- Possible Building Frontages
- Public Amenity open space
- Potential Public Open Space Feature
- Possible Local Equipped Area for Play location
- Potential Attenuation Feature
- Potential Swale Feature
- Policy SD13

- Policy SD13 -
South East Milton Keynes
Strategic Urban Extension

| Revision | Description | Drawn | Checked | Date |
|-------------|-------------|--------|--------------|----------|
| Preliminary | Information | Tender | Construction | As Built |



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Title **Land off Newport Road
Woburn Sands**
Details **Constraints/Opportunities - Development Principles**

Scale **1:1250@A2** Date **June 2018** Drawn **RR** Chk **TF**

Please consider the environment before printing this drawing

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