



# Milton Keynes City Plan Regulation 19 Submission

Land at East of Wavendon, South of Lower End Road

December 2025



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# 1 Introduction

- 1.1 The following submission has been prepared on behalf of the owners of land South of Lower End Road, East of Wavendon, Milton Keynes who are jointly represented by Kirkby Diamond. The submission has been prepared in response to Milton Keynes City Council's Regulation 19 Consultation, having regard to relevant national and local planning policy. The subject site has been included as part of the proposed allocation within the Regulation 19 Local Plan.
- 1.2 The subject site is in a sustainable area of Milton Keynes and adjoins the allocated site known as East of Wavendon Strategic City Extension. Our suggestion is for our client's land at South of Lower End Road, Wavendon to be included within the amended allocation area to help deliver a comprehensive wider scheme and allow the benefits of the proposed allocation to be maximised as part of the Milton Keynes City Plan 2050. The subject site comprises land that is in 2 separate ownerships. The landowners are in agreement that their individual interests are aligned and complementary and that taken together, their land provides scope to extend the proposed allocation area. Through the inclusion of the additional land, this will help to ensure delivery of the wider proposed allocation requirements.
- 1.3 Milton Keynes City Council is a strategic policy making authority, section 5 of NPPF states, that Council should ensure that it has a clear understanding of land availability, via a strategic housing land availability assessment (SHLAA). The SHLAA will help identify land available for development and thereby contribute to the Council's 5-year land supply (paragraph 72 NPPF). The site is available for consideration as part of the proposed allocation to help contribute to full deliverability. The addition of the subject land is to be considered under an equalised land value basis, as has been replicated with other Strategic Land Allocations (SLA's).
- 1.4 We are aware that the proposed allocation for East of Wavendon Strategic City Extension is not proposed for delivery until 2038. However, we are of the opinion that the subject site is deliverable within the next 5 years and that the council should remove the reference to 2038 from the policy. It is evident from the collaborative approach that has been taken by the landowners and stakeholders included within the proposed allocation that it is available and deliverable within the next 5 years. It should therefore be considered for inclusion in the emerging local plan without the 2038 time constraint.
- 1.5 The subject site provides an opportunity to ensure deliverability of the whole of the proposed allocation. It is noted that the draft allocation proposed to deliver 3,000 new homes at circa 60 dwellings per hectare however, the Regulation 19 Local Plan has revised the quantum to around 2,250 new homes despite the inclusion of the subject additional land. Given the amount of infrastructure and social infrastructure required to deliver a sustainable and permissible scheme, the redline area of the Regulation 18 draft allocation may struggle to accommodate all of these requirements. The additional subject land provides further opportunity for open space, green space and biodiversity net gain as well as appropriate forms of built development and community infrastructure, allowing for a higher density residential development to be achieved within the wider proposed allocation. As such, the subject site is available to come forward as part of the Reg.19 proposed allocation. We consider that the inclusion of the subject land will provide a means for the original target of 3,000 dwellings to be accommodated, or potentially increased.

- 1.6 We are also aware that the proposed allocation is dependent on timing, if the proposed allocation does come forward prior to 2038 there is likely to be a further requirement for an additional school and healthcare facility which is likely to require further land or risk reducing housing densities. The subject site provides a logical extension to the proposed allocation and helps to meet the criteria set out in paragraph 5 under the Policy GS15 in the Milton Keynes City Plan 2050.
- 1.7 Kirkby Diamond have undertaken a site visit to assess the physical characteristics of the land and its relationship to the surrounding area. We have also reviewed the character of the village and the availability of facilities and services within the settlement.

## 2 Site Background

- 2.1 The subject site is located in Wavendon Civil Parish, forming the eastern part of Milton Keynes.
- 2.2 The site comprises a gross area of 9.04 acres (3.65 Ha). See the site location plan to support the submission. The subject site comprises land that is in 2 separate ownerships.
- 2.3 The land is currently used as grazing/equestrian use and is classified as Grade 3 agricultural land. The site is considered open countryside and forms part of Wavendon House Registered Parks and Gardens under Plan:MK. The land is adjacent to the existing Grade 2 Listed Building, Wavendon House.
- 2.4 The subject site has currently two equestrian buildings onsite used as stabling and hay storage.
- 2.5 The topography of the site slopes from north to south with approximate measurements of 80m to 77m respectively, above sea level. Wavendon is a very low flood risk area (Flood Risk Zone 1) and is also at low risk of surface water flooding.
- 2.6 The northern boundary is adjacent to Lower End Road, comprising hedgerow and trees. The site has several trees on the site which are subject to group TPO's. The site is enclosed by hedgerow and equestrian fencing and can be accessed independently off Lower End Road.
- 2.7 To the north of the site is the major allocation known as Glebe Farm and Eagle Farm of which the majority of the site is built out, a reserved matters application for 400 dwellings was permitted in 2019 under the ref 19/01196/REM. Directly to the east of the site is Wavendon House. To the south, the subject site adjoins the proposed allocation known as East of Wavendon Strategic City Extension (please refer to appendix 2). To the west of the site, there is further grazing/agricultural land. The proposed allocation is currently being promoted by various developers/promoters who are aligned in delivery of the site in a comprehensive manner in advance of the 2038 date.
- 2.8 Additionally, to the north of Lower End Road is a strategic-scale development at Glebe Farm, Policy SD7 which adjoins the Milton Keynes urban area as shown in PlanMK.

## 3 Planning Policy

- 3.1 Plan: MK was adopted by Milton Keynes Council in March 2019, which covers the period from 2016 to 2031. As mentioned, the site borders a strategic allocation for residential development to the north under Policy SD7 of Plan:MK. The subject site is identified as open countryside.
- 3.2 Policies applicable to the subject site from Plan: MK are as follows:
- DS5 – Open Countryside – The land is classified as open countryside according to the Milton Keynes planning map. Whilst planning permission within open countryside is restricted to certain types of development. Though the site could be utilised for a variety of uses when included as part of the proposed allocation, the Council also outlines new dwellings which are exceptional in quality or innovative in nature of their design might be accepted where they conform with paragraph 55 of the NPPF.
  - ER8 – Employment Uses and Rural Economy – We understand the proposed allocation is to include some forms of employment uses which could be delivered on the subject site. Adding additional land to the proposed allocation can ensure a satisfactory level of employment could be delivered to ensure the wider scheme comes forward as a sustainable development.
  - ER12 – New Shops in the rural area – As a standalone site, the site is unlikely to be suitable to deliver new retail however, as part of the proposed allocation the site may be able to contribute to delivery.
  - NE5 – Conserving and Enhancing Landscape Character – Development within the countryside is acceptable, it will need to be undertaken in a manner that respects the particular character of the surrounding landscape. Given the scale of development growth in the area, the subject site can be utilised to be sensitive to the landscape and heritage aspects whilst enabling the full potential of the proposed allocation to be realised.
  - CT8 – Grid Road Network – Plan MK makes specific reference to the use of grid road networks within Milton Keynes to allow quick vehicle movement through traffic including public transport providing greater connectivity across Milton Keynes. As stated, *‘The use of grid roads allows for the separation of local traffic movements in residential neighbourhoods’*, ensuring that infrastructure and traffic movements resulting from the wider development can be mitigated as well as provide future connectivity through to land due to come forward within Central Bedfordshire. We understand there is likely to be cross-boundary conversations required with Central Bedfordshire Council regarding land to the south and south-east of the proposed allocation which will be an important consideration for the proposed allocation known as East of Wavendon Strategic City Extension to ensure connectivity is reserved. Additionally, we are aware that the strategic allocation under policy SD7 at Glebe Farm and Eagle Farm has a second grid road reserved coming from Eagle Farm Roundabout and past St Mary’s Wavendon CE Primary School. Kirkby Diamond are acting for the landowner of the land known as *‘Land on North side of Lower End Road, Wavendon’* which is partially reserved for a grid road and would provide a logical connection point for the subject site and for the wider proposed allocation providing access to the A421. Furthermore, this would present an opportunity for the site to connect through to the land due to come forward as part of Central Bedfordshire’s review of their local plan which is particularly relevant to paragraph 3 of the Policy GS15 in the MK City Plan 2050. We understand that the Regulation 19 concept plan accommodates this point (see appendix 2).

- 3.3 Registered Parks and Gardens – The subject site falls partly within the registered park for Wavendon House, however, we are also aware that parts of the existing proposed allocation were formerly part of Wavendon House but have since been removed. We would envisage that the subject site could be included as part of the proposed allocation with the necessary mitigation measures included to help preserve the heritage asset. Whilst heritage assets should be preserved where possible, the primary objective should be to ensure functionality of land put forward for development allocations and assist Milton Keynes Council with maximising housing delivery.
- 3.4 **Milton Keynes City Plan 2050**
- 3.5 As stated, the subject site's inclusion within the proposed allocation known as East of Wavendon Strategic City Expansion under Policy GS15 provides a logical extension and ensures the deliverability of the wider mixed-use, residential led strategic development. The revised GS15 policy seeks to reduce the quantum of new homes to '*around 2,250 new homes*'. The inclusion of the additional subject land provides greater scope for higher density residential development across the remainder of the proposed allocation. Additionally, the subject site is available to ensure it can '*protect and enhance the character and sense of place of Woburn Sands and Cross End*' (GS15 E3).
- 3.6 Equally, the subject site can be used to help conserve and protect designated heritage assets, providing additional land to the proposed allocation and enabling the wider proposed allocation to achieve higher density housing. As mentioned before, we are aware that with the existing constraints affecting the proposed allocation, current density is likely to be considerably lower than the desired 60 dph, indicated by the Council. The additional subject land can help alleviate the land take caused by the constraints. Under Policy ECP5, the MK City Plan 2050 states, '*proposals will be supported where they can sustain and, where possible, enhance the significance of heritage assets...including Registered Parks and Gardens*', the site is able to be utilised to ensure the effects of the wider proposed allocation are minimised on heritage. Therefore, the site can have an active role in the proposed allocation. Additionally, the benefits provided by the proposed allocation, including housing delivery, social infrastructure and infrastructure to both Milton Keynes and Central Bedfordshire, which is a key element under the policy (GS15 C), are likely to outweigh any harm to the heritage asset particularly with mitigation measures in place. The subject site's inclusion as part of Wavendon House Registered Park and Garden should not preclude the site from adding to the proposed allocation considering its potential to enable the development to maximise the benefits to the site and wider connectivity across local authority borders.
- 3.7 The proposed allocation requires the inclusion of a 'comprehensive transport network and infrastructure that prioritises active travel and public transport modes consistent with the movement hierarchy set out in Policy GS4' (Policy GS15 14). This policy also refers to the Mass Rapid Transit (MRT) scheme to provide connectivity of the proposed allocation between Glebe Farm, Eagle Farm, Woburn Sands and the surrounding network in Policy GS15 14(a). This policy continues to highlight the benefits of the connectivity, to '*new and/or upgraded travel connections to and crossing of...Lower End Road to ensure appropriate connectivity with existing communities and community amenities*' (Policy GS15 14(d)). The Regulation 18 draft plan envisaged the access connection to come off Lower End Road to provide access through to the A421 at Glebe Farm/Keightley Gate, however, the Regulation 19 concept plan provides an opportunity for the connection point to be delivered through the reserve road at Eagle Farm Roundabout. This will allow the proposed allocation to provide connectivity to land 'adjacent to the allocation outside of Milton Keynes' and within Central Bedfordshire which is detailed in Policy GS15 (c).

- 3.8 Policy GS15 (d) highlights the need for the '*Strategic City Extension should be in accordance with a Framework Masterplan and site-based area Design Code*', the subject site is included within the Regulation 19 concept plan for the proposed allocation and sought to provide further open space, green space, infrastructure connectivity and biodiversity net gain to allow other areas within the wider allocation deliver residential dwellings and built form to assist the Local Planning Authority with delivery of the targeted 3,000 new homes. We are of the view that the previous quantum of housing is deliverable with the addition of the subject land within the proposed allocation. As part of the extended proposed allocation, we would propose that the land value and costs are apportioned on an equalised basis as has been utilised on other SLA's.
- 3.9 The Policy GS15 E4 looks to support '*appropriate distribution, layout and design of development to protect and, where possible, enhance the character and sense of place of Woburn Sands and Cross End*', this relates to the subject land and the contribution that can be made to the wider proposed allocation to ensure that residential development is distributed evenly within the wider proposed allocation, taking into account the sensitivities of the area. The inclusion of the subject land will help preserve the character of the heritage asset and Registered Park & Garden, which is in line with Policy GS15 E5.
- 3.10 Policy GS15 E11 proposes to provide '*a new District Park of at least 15 hectares, alongside other green and blue infrastructure and open space in line with an approved Strategic Green and Blue Infrastructure and Open Space Strategy...*', this is an increase of 3 hectares from the policy GS15 E8 which proposes 12 hectares within the Regulation 18 draft plan however, the quantum of housing delivery has been reduced. The inclusion of the subject site as part of the proposed allocation was to allow further open space, infrastructure connectivity and biodiversity net gain and thereby releasing further land availability to deliver residential dwellings within the wider proposed allocation, with land value and cost being on a equalised basis as utilised in other SLA's.
- 3.11 **East of Wavendon - Policy GS15 Criterion B**
- 3.12 We are aware that the timescale imposed by policy GS15(B) restricts delivery coming forward prior to 2038 and has been proposed to allow existing allocations to the south of the city to be completed beforehand to assess the impact on local infrastructure needs/demands. However, we understand the majority of housing delivery in the strategic land allocation is already complete. In light of this, objective assessments on the effects of growth could be carried out in south of Milton Keynes. Criterion B of policy GS15, should therefore be removed from policy as it contradicts the policy GS2 Strategy for homes and wider growth. Therefore, it is not clear as to why the proposed allocation at East of Wavendon has had a timeframe imposed when it is more deliverable in the short to medium term than other proposed allocations and previous allocated sites such as SEMK.
- 3.13 Paragraph 58 of the NPPF (December 2024) is clear that planning obligations must only be sought where they meet all of the following tests: a) necessary to make the development acceptable in planning terms; b) directly related to the development; c) fairly and reasonably related in scale and kind to the development. Placing obligations on development proposals within the East of Wavendon Strategic City Extension to meet the unmet infrastructure needs of the Strategic Land Allocation or South East Milton Keynes would fail all of these tests.
- 3.14 Additionally, we are aware of the large allocations including the Western Expansion Area and Milton Keynes East which are still to be built out. The timing of the proposed extensions to these allocations is uncertain and could be further delayed due to infrastructure requirements to reduce pressure on the existing infrastructure which will likely affect the anticipated dates for housing delivery. As such, the proposed allocation East of Wavendon presents an opportunity which is less constrained by infrastructure delivery and ultimately could deliver housing in advance of 2038.

## 4 Assessment

- 4.1 The subject site has no adverse planning history and has historically been in equestrian use.
- 4.2 The subject site is available to provide use to the wider proposed allocation at East of Wavendon to ensure the full allocation is deliverable and help enable Milton Keynes deliver its housing targets.
- 4.3 Parts of the subject site are accessed directly from Lower End Road (an adopted highway), and parts are accessed off Wavendon House Drive which is a private road. We are of the opinion that access to the site can be sought either by via Lower End Road, subject to surveys and assessments, or via connectivity through adjoining land controlled by others. The subject site provides scope to deliver improved connectivity and permeability with the developed areas to the north of Lower End Road - providing for more effective integration, as well as a means of safeguarding the potential to deliver active travel linkages and transport corridors with land to the south and east that is within the neighbouring authority's administrative area (CBC).
- 4.4 It is likely that the subject site can be master planned to coordinate with other development parcels within the East of Wavendon proposed allocation to allow for greater cohesion and contribute to deliverability. The subject site can also provide important connectivity to major development areas such as Eagle Farm & Glebe Farm and future connections to Central Bedfordshire.
- 4.5 As referenced earlier, the subject site is in a Flood Zone 1 area, meaning it is at low risk of flooding.
- 4.6 As the site has been in equestrian use, it is unlikely to be affected by contamination but will be subject to surveys.
- 4.7 Plan:MK has not classified the subject site as an ecological designation however, the site is subject to a group tree preservation order and is considered part of Wavendon House Registered Park and Garden. As such, whilst inclusion of the subject site would be beneficial to the East of Wavendon allocation consideration would need to be given to the constraints and mitigation required. The policy ECP5 – Heritage does not prevent sites with heritage considerations coming forward, if the benefits outweigh the harm. There are a number of benefits to be had from the site's inclusion within the East of Wavendon proposed allocation.
- 4.8 The site is adjacent to The Lodge (Grade II Listed), Coach House East of Wavendon House (Grade II), Stable Block (Grade II), Wavendon House (Grade II\*), Bridge to South East of Wavendon House (Grade II) and Bridge to North East of Wavendon House (Grade II), all of which lie to the west of the subject site. The subject site will require uses sympathetic to the surrounding character of the area.

## 5 Conclusions

- 5.1 The site clearly presents an opportunity to contribute to the wider proposed allocation at East of Wavendon, subject to an effective form of equalisation which has similarly been used on other SLA's. The proposed allocation is immediately deliverable and can be delivered within the timescales for the creation of the new Milton Keynes Local Plan. The proposed allocation provides an excellent opportunity to comprehensively promote the site through the MK City Plan 2050 local plan process. In our opinion this represents the best strategy for the site.
- 5.2 The benefits of the inclusion of the subject site within the East of Wavendon proposed allocation include:
- Increased delivery – The inclusion of the subject site enables greater deliverability of the whole allocation, meeting the criterion set out in Policy GS15.
  - Improved connectivity – Both within the proposed allocation and connectivity to surrounding community.
  - Transport corridor / grid road reserve extension potential – The site provides a vital opportunity to provide connectivity to Eagle Farm & Glebe Farm and future connections to Central Bedfordshire to help manage vehicle traffic flows in line with policy GS15 C.
  - Higher level of safeguard for heritage asset – The site provides suitable safeguarding of the heritage asset whilst enabling sustainable development to come forward.
  - Future proofing – The site can accommodate the MRT and connection corridor through to eastern expansion into CBC
- 5.3 We are of the view that the proposed allocation at East of Wavendon can come forward prior to the 2038 date mentioned as part of criterion B of Policy GS15 for the previously mentioned reasons.

## Appendix 1

### Redline map of the subject site







**Name of the Local Plan to which this representation relates:**

Milton Keynes City Plan 2050

Please return by **5.30pm on Monday 22<sup>nd</sup> December 2025** to Development Plans, Milton Keynes City Council, Civic, 1 Saxon Gate East, Milton Keynes MK9 3EJ, or via email at [ncp.engagement@milton-keynes.gov.uk](mailto:ncp.engagement@milton-keynes.gov.uk)

This form has two parts –

**Part A** – Personal Details: need only be completed once.

**Part B** – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

**Part A**

**1. Personal Details\***

**2. Agent's Details (if applicable)**

*\*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Title

Mr

Mr

First Name

Alex

Andrew

Last Name

Jenden

Wright

Job Title

Development Surveyor

Partner

(where relevant)

Organisation

Kirkby Diamond

Kirkby Diamond

(where relevant)

E-mail Address

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone Number



**Part B – Please use a separate sheet for each representation**

Name or Organisation:

**3. To which part of the Local Plan does this representation relate?**

Paragraph

Policy

Policies Map

**4. Do you consider the Local Plan is: (Please tick as appropriate)**

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

4.(3) Complies with the Duty to co-operate

Yes

No

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see the attached submission document which reviews a number of policies which need to be reconsidered/removed:

- GS15 B – removal of the 2038 time constraint
- GS15 E1 – reconsidered to enable delivery of 3,000 dwellings

The key elements relate to the land off Lower End Road, Wavendon’s suitability for continued inclusion within the proposed East of Wavendon allocation.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see the above and the attached submission document.

(Continue on a separate sheet /expand box if necessary)

**Please note** your representation should cover succinctly all the evidence and supporting information necessary to support/justify your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he or she identifies for examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

**No**, I do not wish to participate in hearing session(s)

**Yes**, I wish to participate in hearing session(s)

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

### **Sharing your personal details**

Please be aware that, due to the process of having an Independent Examination, a name and means of contact is required for your representation to be considered. Respondent details and representations will be forwarded to the Inspector carrying out the examination of the Local Plan after the Proposed Submission period has ended. This data will be managed by a Programme Officer who acts as the point of contact between the Council and the Inspector and respondents and the Inspector.

For more information on how we use your data – please see our privacy notice by using the following link: <https://www.milton-keynes.gov.uk/milton-keynes-council/privacy-notice/milton-keynes-city-council-corporate-privacy-notice>

**Representations cannot be treated as confidential and will be published on our website alongside your name.** *If you are responding as an individual rather than a company or organisation, we will not publish your contact details (email / postal address and telephone numbers) or signatures online.*