

**Representations to the  
MK City Plan 2050  
Regulation 19 Draft**

---

Land off Lower End Road, Wavendon,  
Milton Keynes

On behalf of Abbeygate Developments Ltd

---

December 2025

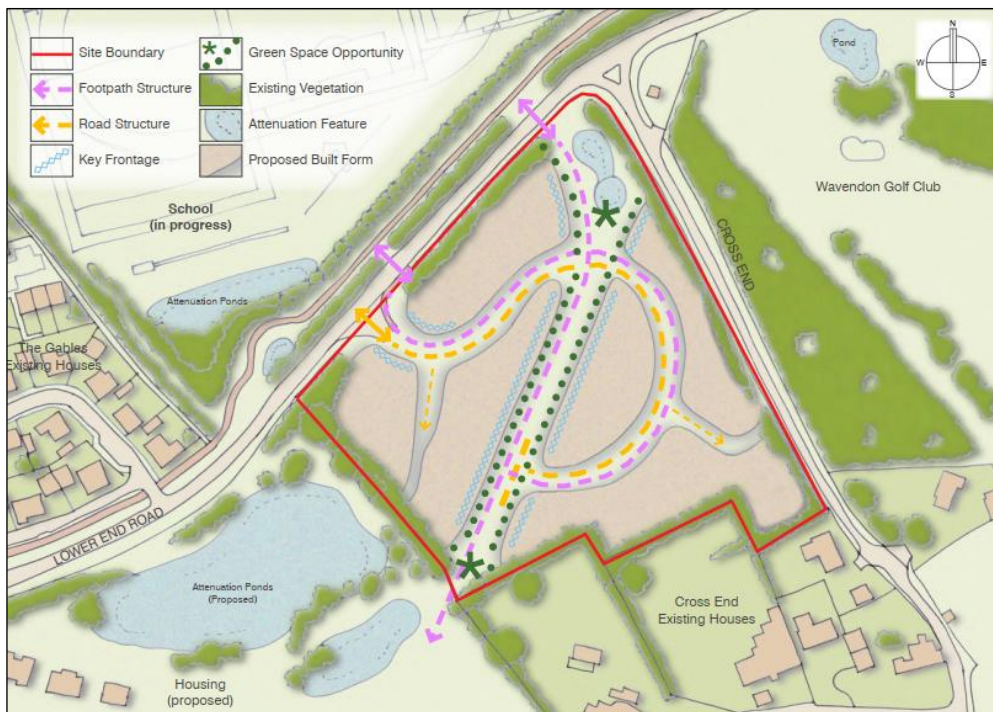
Ref: 5212

Smith Jenkins Ltd



# 1 Introduction

- 1.1 These representations have been prepared by Smith Jenkins Planning & Heritage on behalf of Abbeygate Developments Ltd in response to the Milton Keynes City Plan Regulation 19 consultation.
- 1.2 The representations should be read alongside, and in continuation of, the detailed Regulation 18 representations (October 2024), which accompany this submission as **Appendix 1**.
- 1.3 In responding to the Regulation 18 consultation, Abbeygate Developments Ltd promoted the allocation of Land off Lower End Road, Wavendon for residential development of circa 60 dwellings including affordable housing, open space, landscaping and drainage attenuation. An indicative layout was shown in the Framework Plan below in **Figure 1** which formed part of a wider Vision Document (April 2022).



**Figure 1** – Framework Plan - Land off Lower End Road, Wavendon

- 1.4 The Regulation 18 representations set out the full background of the site, how it is deliverable and available now and how development on it would deliver a number of significant social, economic and environmental benefits, fully aligned with the three key dimensions of planning in achieving sustainable development as defined in the National Planning Policy Framework (NPPF).
- 1.5 The Regulation 18 representations detailed how Abbeygate Developments Ltd have entered into collaborative discussions with the promoters of the adjacent parcel of land (Land off Newport Road, Wavendon) in terms of the potential of both sites to come forward together with a shared active travel link between them as shown in **Figure 2** below.



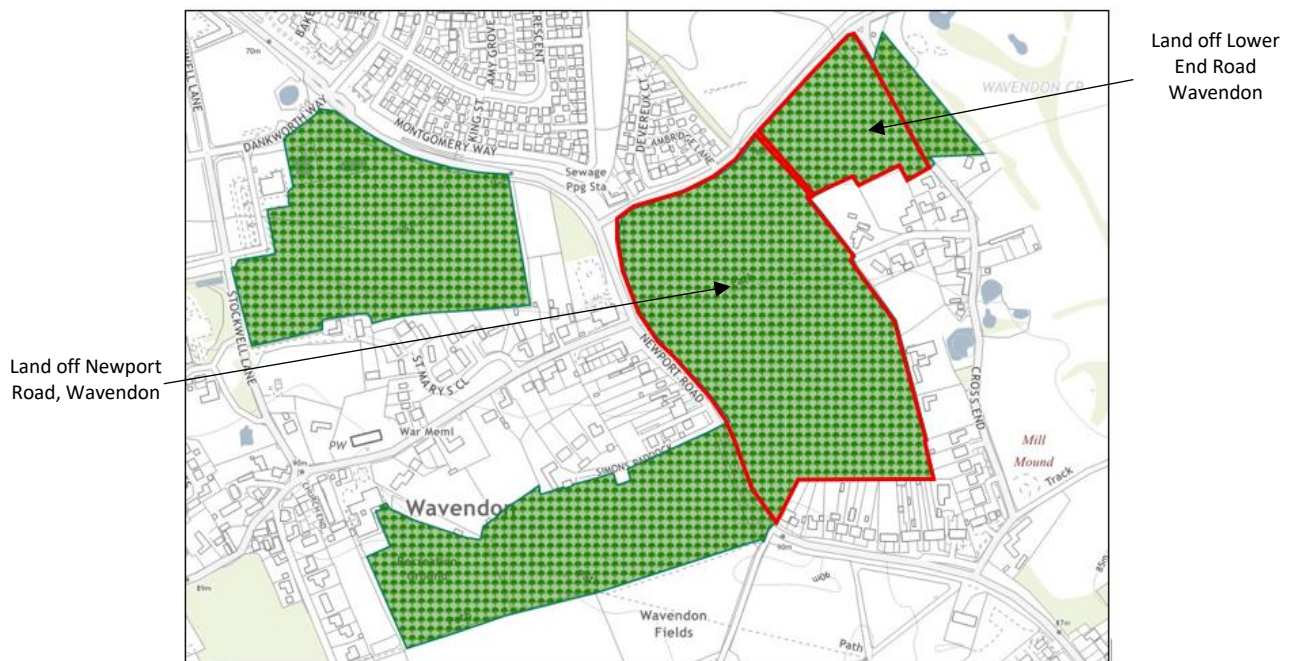
**Figure 2 - Development Opportunities Plan – Land off Newport Road, Wavendon and Land off Lower End Road, Wavendon**

1.6 The Regulation 18 response set out, in summary:

- Abbeygate Developments Ltd supports the Plan’s overall ambitions and objectives for growth, in particular through the delivery of new homes;
- In order to deliver the ambitions and objectives, address the Government’s clear drive of significantly boosting the supply of homes and meet needs that cannot be met within neighbouring areas, the Council should seek to deliver the upper range of the housing target over the Plan period;
- The Plan will need to optimise all potential sources of housing land supply. The Plan should be focussed on the sites which are available now and that will contribute to supply in the short-term and make up any shortfall if strategic sites don’t deliver;
- The Plan should allocate smaller sized, deliverable sites in sustainable locations which can start contributing towards housing needs within a shorter time period compared to larger strategic sites to diversify supply and increase flexibility;

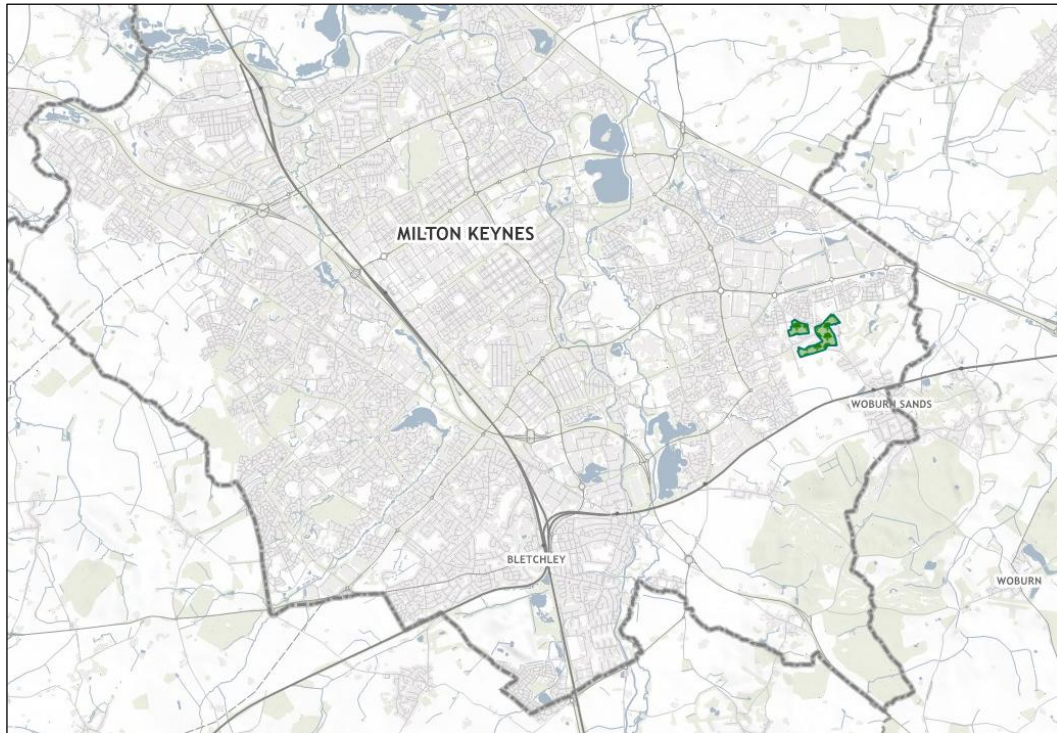
- Land off Lower End Road, Wavendon represents an immediately available, suitable, achievable and therefore entirely deliverable option for residential development with no physical, legal or environmental constraints. It is in a sustainable location on the edge of existing residential development such that it could benefit from existing infrastructure;
- Land off Lower End Road, Wavendon should be either allocated for residential development in isolation or included in the wider Policy GS15 East of Wavendon Strategic City Extension;
- Land off Lower End Road, Wavendon can come forward with Land off Newport Road, Wavendon to deliver a compressive, sustainable development early in the Plan period;
- The proposed Wavendon Strategic Buffer designation (Policy GS16) should be omitted on the basis that it is entirely unjustified and would not serve any useful purpose

1.7 The Regulation 19 draft has retained the Wavendon Strategic Buffer designation as shown below in **Figure 3**.



**Figure 3 - Wavendon Strategic Buffer and promoted sites**

1.8 The Wavendon Strategic Buffer is the only such designation in the whole of the Plan area, as shown in **Figure 4**.



**Figure 4 - Wavendon Strategic Buffer in the wider context**

1.9 One of the key purposes of the Regulation 19 stage is to assess whether the draft Local Plan is sound, as defined by Paragraph 36 of the National Planning Policy Framework (2024). Accordingly, our representations are structured to address the four tests of soundness:

- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant

1.10 These representations:

- Identify whether the Regulation 19 draft addresses the matters raised at Regulation 18;
- Assess whether the Plan is sound against the tests in Paragraph 36 of the NPPF; and

- Set out the modifications needed to make the Plan sound where deficiencies remain.

1.11 We trust that these representations will assist the Council in finalising the Plan and ensuring that it proceeds to examination in a sound form. We would welcome continued dialogue with officers on any of the matters raised.

## 2 Representations

### Policy GS2 Strategy for Homes

#### Soundness

- 2.1 Draft Local Plan Policy GS2 Strategy for Homes seeks to ensure the housing requirement is met by providing for a minimum of 50,372 (net) new homes over the period 2022– 2050. This will need to be maintained as a deliverable supply over the Plan period.
- 2.2 As drafted, the policy places a disproportionate reliance on a limited number of large strategic housing sites to meet identified housing needs. It also fails to adequately account for unmet housing needs and the wider strategic planning pressures arising from neighbouring authorities, particularly in the context of any forthcoming Spatial Development Strategy (SDS) operating across broader geographies. The commentary below sets out why this approach is considered **unsound**.

#### ***a) The Plan is not Positively Prepared***

- 2.3 Policy GS2 is not positively prepared because it assumes that MKCC's identified housing requirement can largely be met through a number of large strategic allocations, without sufficient contingency should these sites fail to deliver at the anticipated rates.
- 2.4 Whilst it is acknowledged that strategic sites are important for the diversity in sources of supply, there is a need to ensure that 'deliverability' has been thoroughly assessed. A large proportion of the capacity for the sites expected to be delivered in the Plan period may not meet the definition of deliverable and there is a risk that supply will not be maintained consistently should these not come forward as expected. A more balanced supply is required, and this could be achieved by the inclusion of smaller, deliverable sites in the short term.
- 2.5 This has been demonstrated by the existing allocations in Plan:MK, for example, Milton Keynes South East Strategic Urban Extension (Policy SD11) which is allocated for the delivery of around 3,000 homes and was expected to deliver 50 dwellings in the monitoring year 2023/24, 250 dwellings in 2024/25, 350 dwellings in 2025/26 and 450 dwellings in 2026/27. As the site does not yet have planning permission, there will be a delay in the expected delivery of homes at this site against the trajectory.
- 2.6 Land off Lower End Road, Wavendon provides an opportunity to allocate a smaller site to provide flexibility in the event that allocated sites do not deliver at the rates expected or do not come forward during the Plan period. The site represents an immediately available, suitable, achievable and therefore entirely deliverable option for residential development with no physical, legal or environmental constraints such that it could come forward early in the Plan period.
- 2.7 In addition, the policy fails to demonstrate how any potential unmet housing needs from neighbouring authorities have been taken into account or how cross boundary strategic planning has been considered.

- 2.8 In this regard, since the Regulation 18 stage, Bedford Borough Council has withdrawn its emerging Local Plan following the identification of land for the Universal Studios development which was granted permission via a Special Development Order on the 16<sup>th</sup> December 2025 and will attract up to £50bn in inward investment including the creation of 20,000 construction jobs, 8,000 permanent positions with approximately 80% of these going to local workers including from Milton Keynes. Housing growth that had previously been identified on or associated with this land can no longer be assumed to come forward as planned. This creates uncertainty regarding how Bedford Borough's housing needs will be met and increases the likelihood that unmet need will need to be addressed elsewhere within the wider housing market area.
- 2.9 Buckinghamshire also continues to experience significant and sustained housing pressures. The Buckinghamshire Local Plan is emerging but the absence of an up-to-date, comprehensive spatial strategy covering the whole of Buckinghamshire has increased uncertainty around how housing needs are to be distributed and met in a co-ordinated manner. Where Local Plans are emerging or being reviewed, there is a heightened risk that housing delivery will fall behind identified needs, particularly in the early years of Plan periods. This places greater importance on neighbouring authorities ensuring that their own Local Plans are sufficiently robust, flexible, and responsive to wider housing market pressures.
- 2.10 Milton Keynes also adjoins the Central Bedfordshire boundary. Land in Central Bedfordshire adjoining this part of Milton Keynes is emerging as a future area for development which will help to support the long-term growth of Milton Keynes and the central growth area within the Oxford–Cambridge Arc, ensuring the continued economic success and prosperity of the area. It is therefore important that decisions taken now on timing and delivery do not prejudice wider strategic planning. As set out below, development in this area of Milton Keynes is not proposed to start before 2038; however, decisions that would restrict delivery in advance of that timeframe would compromise long-term growth strategies, undermine the ability to deliver a comprehensive and coordinated approach to cross-boundary development, and risk constraining the future economic potential of the area.
- 2.11 There is no clear evidence that cross-boundary housing pressures have been fully considered or that the Plan provides flexibility to respond to such needs. This results in a strategy that does not adequately address the full scale of housing requirements affecting the area.

***b) The Plan is not Justified***

- 2.12 Policy GS2 is not justified because it is not supported by robust evidence demonstrating that reliance on large strategic sites represents the most appropriate strategy when considered against reasonable alternatives. Large sites are inherently complex, often constrained by infrastructure requirements, land assembly issues, viability challenges and long lead-in times.
- 2.13 The Plan does not sufficiently explore alternative approaches, such as a more balanced distribution of housing across a range of site sizes and locations, including smaller and medium-sized. It does not justify why such sites have been discounted in favour of a strategy heavily weighted towards strategic allocations.

- 2.14 Furthermore, the Plan does not provide a clear explanation of how housing needs and strategic growth arising from neighbouring authorities has been assessed or potentially accommodated. The absence of this evidence undermines the justification for the chosen strategy.

***c) The Plan is not Effective***

- 2.15 Policy GS2 is not effective because it relies on delivery assumptions that are highly optimistic and lack resilience. Large strategic sites typically deliver housing slowly, particularly in the early years of a Plan period. Any delay in infrastructure funding or market delivery would have a significant and disproportionate impact on overall housing supply.
- 2.16 The policy also lacks flexibility to respond to delivery shortfalls or changes in housing need, including those arising from neighbouring authorities. Without a diversified portfolio of sites and a clear mechanism for addressing cross-boundary needs, the strategy is vulnerable to under-delivery and fails to provide a realistic prospect of meeting housing requirements over the Plan period.

***d) The Plan is not Consistent with National Policy***

- 2.17 Policy GS2 is not consistent with national policy. The NPPF clearly requires Local Plans to significantly boost the supply of homes in an appropriate mix (Paragraph 61) and address unmet development needs from neighbouring areas (Paragraph 27), including through effective cross-boundary cooperation (Paragraph 24). Paragraph 69 requires strategic policy-making authorities to establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The NPPF also recognises that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, are essential for Small and Medium Enterprise housebuilders to deliver new homes and are often built-out relatively quickly (Paragraph 73).
- 2.18 A strategy that relies predominantly on a number of large strategic sites does not align with this objective and increases the risk of stalled or delayed delivery. In addition, the failure to clearly demonstrate how neighbouring authority housing needs have been taken into account is inconsistent with the requirement for effective strategic planning and cooperation on cross-boundary matters.

***Requested Modifications***

- 2.19 Policy GS2 is unsound because it places excessive reliance on large strategic housing sites and fails to adequately consider or respond to housing needs and cross boundary pressures arising from neighbouring authorities. The policy should be amended to include a more balanced and flexible housing strategy, incorporating a wider range of site sizes and locations and clearly demonstrating how cross-boundary housing needs have been addressed. The Plan should allocate smaller sized deliverable sites in sustainable locations which can start contributing towards housing needs within a shorter time period compared to larger strategic sites to diversify supply and increase flexibility.

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

### **Soundness**

- 2.20 The East of Wavendon Strategic City Extension is allocated for a new, mixed-use, residential-led, strategic development to the east of Wavendon and north of Woburn Sands. The site is allocated for delivery of around 2,250 (reduced from 3,000 in the Regulation 18 draft) which will not be permitted to occur prior to 2038.
- 2.21 Abbeygate Developments Ltd support Policy GS15 East of Wavendon Strategic City Extension and the identification of growth in this part of the City but consider that the policy defines an incomplete strategic allocation by excluding land off Lower End Road, which is functionally and spatially part of the East of Wavendon area. In addition, the Plan inappropriately phases the site late in the Plan period, whereas evidence indicates that it should be brought forward sooner to meet housing needs in a timely manner. The following commentary sets out below why this approach is **unsound**.

#### ***a) The Plan is not Positively Prepared***

- 2.22 Policy GS15 is not positively prepared because it fails to plan comprehensively for development in this location and does not demonstrate a proactive strategy to boost housing supply. The exclusion of land off Lower End Road results in a fragmented and sub-optimal allocation. Bringing the site forward sooner, including the promoted land, would allow for more coordinated development, early delivery of housing, and effective integration with supporting infrastructure.

#### ***b) The Plan is not Justified***

- 2.23 Policy GS15 is not justified because the Plan does not provide robust evidence for excluding land off Newport Road which would create a more coherent allocation boundary, improve access and wider connectivity and increase flexibility.
- 2.24 The pace of housing delivery on sites previously allocated in Plan:MK suggests that a restriction on the commencement of development in the East of Wavendon allocation (until after 2038) is not justified. In light of the delays to the delivery of housing in other allocations, and due to the scale and complexity of development on large strategic city extensions, a more prudent approach to ensuring a robust housing land supply position across the plan period would be to remove the arbitrary (as yet, unjustified) restriction on the commencement of development before 2038. The restriction will unnecessarily preclude housing delivery early on in the Plan period and does not allow for a scenario where other allocations are delayed.

#### ***c) The Plan is not Effective***

- 2.25 Policy GS15 is not effective because it unnecessarily restricts early housing delivery. By phasing development late and excluding the promoted land, the Plan risks slower housing delivery than required to meet needs and inefficient use of available land and infrastructure.

- 2.26 Earlier delivery of the East of Wavendon Strategic City Extension, including land off Newport Road, would improve effectiveness by providing a realistic, deliverable, and well-coordinated strategic site that contributes to meeting housing requirements promptly.

***d) The Plan is not Consistent with National Policy***

- 2.27 The NPPF requires Local Plans to boost the supply of homes significantly, ensure deliverability, and make effective use of available land. Policy GS15, as drafted, conflicts with these principles because it excludes suitable land that could be delivered in the short term and delays the contribution of a large strategic site to meeting housing needs. Bringing the allocation forward, including Newport Road, would align the policy with national policy objectives on housing delivery and sustainable growth.

**Requested Modifications**

- 2.28 The policy should be amended to include the promoted land within the East of Wavendon Strategic City Extension and to bring forward development earlier in the Plan period.

**Policy GS16 Wavendon Strategic Buffers**

**Soundness**

- 2.29 Draft Policy GS16 states that to retain Wavendon's character as a distinct and historic settlement within the wider built-up area of Milton Keynes City, development proposals within the Wavendon Strategic Buffers that significantly harm the open character of land will be refused. Development proposals are also required to enhance open space function and landscape quality.
- 2.30 The wording of the policy has been amended from the Regulation 18 stage. Previously, any development in the buffer was to be blanket 'refused.' The current wording now allows development provided it does not result in 'significant harm' to the open character of the land. While this relaxation of the policy is welcomed, it remains **unsound** for the reasons set out below.

***a) The Plan is not Positively Prepared***

- 2.31 Policy GS16 is not positively prepared because the identification of land at Wavendon as a buffer represents an unjustified constraint on development in a sustainable and deliverable location. In the context of acknowledged housing need over the plan period to 2050, the failure to allocate suitable land adjoining an existing settlement undermines the Plan's ability to deliver sufficient homes.
- 2.32 Paragraph 108 of the Plan states: *The approach to designing and developing the City of Milton Keynes since its inception saw many historic settlements kept physically and perceptively differentiated from new areas of growth.* In this regard, there are no buffers around any of the original towns/villages of Milton Keynes. It has been established practice in Milton Keynes over the past 50 years for settlements to be managed through comprehensive spatial planning incorporating open space and public amenities. Policy GS16 departs from this established approach by introducing an arbitrary landscape buffer which does not serve any useful function. The designation of the land as a landscape Buffer represents a totally efficient use of sustainable land.

***b) The Plan is not Justified***

- 2.33 The Milton Keynes Review of Local Landscape Designations prepared as part of the Evidence Base for the Local Plan (May 2024) undertakes a review of the landscapes within the Borough and provide recommendations on landscapes that could merit local landscape designation. The Wavendon Buffer is within Landscape Character Area 5b. The Review of Local Landscape Designations concludes that the area does not meet the Local Landscape Designation criteria and as such it was not taken forward for designation in this regard.
- 2.34 A high-level Landscape Visual Assessment has been undertaken by IDP for Land off Lower End Road Land in conjunction with Land off Newport Road on behalf of the promoters of the two sites. This assessment concludes that the sites offer the opportunity to provide new housing which would extend the existing development parcels whilst maintaining the setting of both Wavendon village, the existing landscape structure, the character and setting of each existing development cluster, and the setting of the nearby heritage assets. These findings directly contradict the rationale for the proposed Strategic Buffer and demonstrate that the land can accommodate sustainable development.
- 2.35 Policy GS16 is therefore not justified because the designation of the Wavendon Strategic Buffer is entirely arbitrary and unsupported by any technical evidence. As detailed above, the evidence available confirms that land in which the site is located does merit local landscape designation. There is no further evidence that assesses the buffer area in terms of its landscape quality or function and no landscape or visual appraisal to demonstrate that this buffer is necessary to protect landscape character or local amenity in this location. It is the only buffer of its type in the Local Plan and is introduced without explanation as to why this area requires special protection beyond existing policies.

***c) The Plan is not Effective***

- 2.36 Policy GS16 is not effective because it prevents the sustainable use of land for development without clear evidence of need. The designation of an arbitrary buffer creates planning uncertainty and restricts housing delivery at a time when the Plan relies heavily on a small number of large strategic sites. By preventing development on land that is demonstrably suitable and deliverable, Policy GS16 undermines the Plan's ability to meet housing requirements efficiently.
- 2.37 The buffer also designation lacks a clear mechanism for long-term management (for example by The Parks Trust), calling into question its effectiveness over a plan period extending to 2050. There is no indication that the land will be managed to meet the objectives set out in Policy GS16. Indeed, the site is entirely in private ownership and as such the Plan cannot impose any requirements for it to be managed or available for public access.
- 2.38 Allocating the land for housing would provide a more resilient and deliverable strategy with the ability to deliver public open space and landscaping, as shown in the Development Opportunities Plan and wider Vision document. The land is well related to the existing settlement pattern and existing infrastructure and has the potential to support sustainable growth in the short term through

integrated design, public open space, landscaping and biodiversity enhancements which can be considered in detail at a planning application stage.

***d) The Plan is not Consistent with National Policy***

- 2.39 Policy GS16 is not consistent with national policy. The NPPF requires that Local Plans significantly boost the supply of homes (Paragraph 61), make effective use of land and plan positively for sustainable development (Paragraphs 11, 124–126) and protect valued landscapes in a manner commensurate with their statutory status or identified quality in the development plan (Paragraph 187).
- 2.40 The land proposed for the Wavendon Strategic Buffer has no identified landscape value, its quality has not been assessed, and the designation is entirely arbitrary. It is unsupported by any evidence and unjustifiably prevents development on land that could otherwise be developed sustainably. It therefore fails to align with the NPPF’s requirement to balance protection of landscape with sustainable development. By unduly restricting housing on deliverable land, the policy conflicts with the national objective to boost housing supply while ensuring development is sustainable and planned.
- 2.41 The blanket designation of buffer land, without clear justification or evidence, represents an overly restrictive approach fail to meeting housing needs. This is contrary to the NPPF’s requirement to balance social, economic, and environmental objectives.

**Requested Modifications**

- 2.42 The Plan should be modified to omit the buffer designation and allocate the promoted land for housing development, supported by appropriate design principles, landscape mitigation, and infrastructure provision.

### **3 Conclusion**

- 3.1 These representations have been prepared by Smith Jenkins Planning & Heritage to the Milton Keynes City Plan Regulation 19 consultation on behalf of Abbeygate Developments Ltd in respect of Land off Newport Road, Wavendon, Milton Keynes.
- 3.2 The representations set out that in order to deliver the Plan's ambitions and objectives, address the Government's clear drive of significantly boosting the supply of homes and meet needs that cannot be met within neighbouring areas, there should be less reliance on strategic sites to deliver housing growth given there is no guarantee that these will be delivered within the Plan period.
- 3.3 Given an increasing need for housing (both in Milton Keynes and its neighbouring areas) and historic past delivery of strategic allocations, Land off Newport Road, Wavendon (and the adjoining parcel) should be allocated for residential development in the Local Plan. Allocating smaller sized deliverable sites in sustainable locations housing such as this will contribute to meeting housing needs within a shorter time period to diversify supply and increase flexibility.
- 3.4 Land off Lower End Road, Wavendon represents an immediately available, suitable, achievable and therefore entirely deliverable option for residential development with no physical, legal or environmental constraints. It is in a sustainable location on the edge of existing residential development such that it could benefit from existing infrastructure and thus be delivered early on in the Plan period.
- 3.5 The representations have also demonstrated that the proposed Wavendon Strategic Buffer policy should be omitted on the basis that it is not justified and would not serve any useful purpose.
- 3.6 We therefore urge MKCC to revise the draft Plan accordingly before submission to ensure that it is sound.
- 3.7 We trust that these comments will be duly considered as the preparation of the Plan progresses.

## **APPENDIX 1**

8 October 2024  
Final Response - 09 October 2024 - Abbeygate Developments



Development Plans Team  
Milton Keynes City Council  
Civic Offices  
1 Saxon Gate East  
Milton Keynes  
MK9 3EJ

By email only to  
[ncp.engagement@milton-keynes.gov.uk](mailto:ncp.engagement@milton-keynes.gov.uk)

Dear Sir/Madam

**MK City Plan 2050  
Regulation 18 Plan for Consultation  
Response on Behalf of Abbeygate Developments Ltd**

Savills is instructed by Abbeygate Developments Ltd as representatives of the landowners to submit representations to the Milton Keynes City Council on the above consultation.

Abbeygate Developments holds an interest in an approximately 2ha site (site ref 110523) to the east of Wavendon village and to the south of the recent Eagle Farm development which is opposite the site over the Lower End Road. The site has been promoted for residential development through the emerging local plan process and has been included within the designation of the Wavendon Strategic Buffer (WSB).

The Site has been promoted for development for a number of years and we have worked collaboratively with the adjacent promoters of the site at Land off Newport Road Wavendon (site ref 110543) so the developments can share active access (pedestrian/cycling) and meet a joint landscape assessment, whilst reducing any impact upon the character of nearby villages of Wavendon and Cross End. This reflects the assessment in the SHLAA accompanying the consultation that these sites should come forward as part of a wider assessment of the sites in the locality.

The structure of these Regulation 18 comments is as follows: -

- The Site
- Emerging Planning Policy
- Other considerations
- Conclusions

**The Site**

The Site comprises 2.04 hectares in size. This is the gross site area. A site location plan accompanies this submission.

The Site is currently pasture land used as a paddock for the grazing of horses and a donkey and as such has the characteristics of such use including siting of a field shelter in the south of the Site.

There is a gentle fall in site levels from south to north, from roughly 81m/80m to 76m/75m above sea level.

The north west boundary adjoins Lower End Road, comprising hedging, trees and an existing field access.

The north east boundary adjoins Cross End, comprising hedging and trees.



The south east boundary adjoins the north boundaries of residential properties located off Cross End. This boundary mainly comprises hedging and trees.

The south west boundary adjoins undeveloped land which adjoins the Newport Road. This boundary also mainly comprises hedging and trees. This land is being promoted for up to 250 dwellings and associated development led by David Wilson Homes (DWH).

On the east side of Cross End is Wavendon Golf Course. This land is being promoted for residential and associated development and has been included as a draft allocation in the local plan as part of the East of Wavendon Strategic City Extension.

Immediately to the north of the Site, on the opposite side of Lower End Road is Glebe Farm School. This is a new school being developed in the parish of Wavendon.

Redway Number 04 runs along the north side of Lower End Road capable of being accessed across from the Site. Public Footpath reference: Wavendon FP 002, is located to the south of the Site, accessed via Cross End.

### **Emerging Planning Policy**

The MK Plan 2050 is currently at Regulation 18 stage for consultation and proposes a plan period of 2022-2050. This is an ambitious period which allows for long term strategic planning in-line with the NPPF objectives set out in para 22 of the NPPF (December 2023) which states that strategic development should be planned for over a 30-year period. Given that the plan proposes six sites of over 1,000 units which can be considered strategic developments and that range in size up to 7,750 at the Eastern SCE (with scope for a further 8,250 in this location beyond 2050), this plan period is considered to be appropriate given the scope of the plan.

Proposals for allocation of between 53,000 – 63,000 units (which around 29,000 already allocated in the adopted local plan) in the period up to 2050. This is again ambitious and exceeds the existing Standard Method and the emerging new figure, even at the bottom end of the projection. Notably in the 63,000 units there are a number of vague assertions for sites in 'broad locations' for growth – for example some 2,500 units around transport hubs are included under an assumption of delivery in these approximate locations and are not evidenced. Furthermore, some 11,000 units are notionally to be delivered in Central Milton Keynes (CMK). This figure appears to come from the Land Availability Assessment (LAA) for CMK and is not fully evidenced and considered to be deliverable under the Councils own evidence.

Development is proposed to be largely directed to the east and south of the city with some more limited development to the west. 15,000 units are proposed for the CMK in a combination of regeneration of existing development and new sites around Campbell Park, with as noted above 11,000 of these proposed to be built within the plan period. This will only be enabled by a significant change in the use of the City centre and could take some time to affect change, if at all, especially at the viability levels detailed in the supporting Whole Plan Viability Report, which finds brownfield flats in the City centre one of the least viable options assessed.

Whilst Abbeygate supports the ambition of the Council to set goals for high levels of housing over a realistic plan period of nearly 30 years, there is some concern about the stated sites deliverability. The Plan should allocate smaller sized deliverable sites, such as the Land South of Lower End Road, which can start contributing towards housing needs within a shorter time period compared to larger strategic sites to diversify supply and increase flexibility.

### **Policy GS2 Strategy for homes**

There is no guarantee that the various proposed allocations, especially strategic scale development, will be delivered at all or to the extent projected within the proposed plan period.

It will be necessary for a thorough review to be undertaken of the proposed housing allocations and for this to lead to an update to the housing trajectory. We suspect that additional land will be required to be identified for

housing development. This might be based on the projected shortfall from current sites and/or the need for an appropriate buffer of housing sites.

We request that our client's site is included in the review and is identified as a proposed housing site.

### **Policy GS3 Strategy for economic prosperity**

The distributed proposals for employment land appears to be a comprehensive and inclusive strategy for delivery. There should be consideration of a buffer and/or flexibility to allow for changing circumstances in economic activity.

### **Policy GS4 Strategy for People Friendly and Healthy Places**

The proposed text and supporting table of distances (Table 3) provides clear guidance on the required catchment distances that the LPA expects amenities to be provided. However, such stringent requirements can negatively impact upon urban design principles occasionally and it would be prudent to include a clause in the policy text or the supporting text that provides for such situations, whereby part of the site might fall out of the specified distances but that the solution can be more harmful to the overall layout of the scheme.

We suggest that a phrase such as *'any deviation from these standards must be evidence based'*.

### **Policy GS9 Supporting Growth with Infrastructure**

This policy is clear and justified in the main. There is flexibility built into the text to allow for the right infrastructure to come forwards in various ways which can aid delivery. There is a risk with the list of infrastructure themes (water, energy and waste in particular) that developments are required to compensate national infrastructure bodies which have funding shortfalls which could impact upon viability of schemes and therefore delivery. It should be made clear that funding should only be sought for those level of infrastructure which are pertinent to planning and are not otherwise secured via alternative mechanisms.

Paragraph C. refers to provision '2.b' but this would be more clearly referenced as 'B.2'.

### **Policy GS10 Movement and Access**

The policy makes reference to supporting future development of a Mass Rapid Transit network. Currently the details on the MRT are limited and further details are needed so as to fully understand the implications of this reference.

The protection and enhancement of the grid roads should include cross boundary discussions so that road corridors are protect and unacceptable bottlenecks are avoided when adjacent authorities might not otherwise support MK standards for their principal routes. It is noted that in the text for GS11 principle 7 would seem to be attempting to secure this – GS10 could cross reference this part of the draft policy for clarity if that is the intention.

The SHLAA assessment of the Site states that access to the Site cannot be taken from the Lower End Road, however, a transport assessment with TRICS survey as evidence, was carried out to support the 2022 call for sites submission. This assessment found that the development of the site for 60 units would result in a very modest number of movements (30 per hour at peak time) and that this could be achieved within the existing 30mph limit on an existing field access. Furthermore, should the scheme come forwards the 30mph limit could be moved to further increase the safety of the site.

Similarly, transport work has shown that the Newport Road site can be accessed without significant harm to road safety and a scheme for 180 units on the site in 2017 drew no objections from Highways Officers at the time – with access to be taken from a single access from the Newport Road.

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

Having a set of cross-boundary principles is a sensible and forward-thinking approach, especially as the City proposes development in the south east and west of the authority that will take the urban edge of the City right up to the authority boundary. This will result in areas across the boundary being more sustainable places for development by the adjacent authorities, over the plan period and beyond. Having a clear set of principles will enable better and more integrated developments. This should not however replace active cooperation with the adjacent authorities, and this is recognised in the draft text at limb 1. which advocates close joint working, which our client supports.

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

The new draft allocation for the East of Wavendon site under GS15, is an agglomeration of several sites to the east of the Lower End Road Site. According to the assessments within the MK SHLAA these sites were required to be brought together in order to satisfactorily plan for sustainable development. The East of Wavendon draft text suggests that around 3,000 units could be accommodated on the land within the proposed allocation. However, there are a number of constraints which could impact upon the final level of residential development which could be achieved on the allocation. These include a buffer around the Grade II\* Wavendon House and its registered park and gardens, the proposed 12-hectare park, primary and secondary education provision and a range of community amenities. On-site BNG and MK open space provision would also impact upon the final net developable land.

This is reflected in the SHLAA assessment table which suggests a capacity of 2,260 is available and achievable on the five main sites which make up the majority of the allocation. If only between 2,260 and perhaps 2,500 units (assuming additional land) can actually be delivered on the allocation outlined under emerging policy GS15, then in order to reach a figure closer to the proposed allocation the policies should be altered to include further development land. One way to meet the ambition of the authority would be to alter policy GS16 to remove sites 110523 & 110543, which could then be allocated for development in a new policy for around 250 homes which is shown by the landscape report accompanying this submission to still protect both Wavendon village and Cross End. The remaining land containing the Community Centre and recreation ground to the west of Newport Road could still be retained in GS16 as a buffer to protect Wavendon Village should that be felt necessary. This would help achieve a figure close to or exceeding 3,000 units east of Wavendon and also would result in spatial treatment of development around villages – through comprehensive masterplanning – that is more in-keeping with the way settlements of this size have been treated throughout the history of Milton Keynes as the City has grown and embraced them.

There is a restriction imposed by the draft text that residential development will not be accepted to start before 2038 on this draft allocation. This is due in part at least to the fact that the current SEMK extension should be substantially complete by the late 2030s, and that the area will have been subject to significant development for a long period. This is a weak argument for why development should not otherwise come forwards in a timely fashion in sustainable locations, such as identified by the plan here. This restriction could preclude earlier delivery if the relevant infrastructure is in place, including access via the protected route of the grid road to the north via Eagle Farm or from the east through Central Bedfordshire. Removing the restriction would enable greater flexibility for the authority to actually deliver housing. Including the restriction might also harm delivery of the northern part of SEMK and the extension of H10.

### **Policy GS16 Wavendon Strategic Buffers.**

The Site has been included in the draft local plan as falling within the area for Policy GS16.

This draft policy meets the following objectives according to the summary table reproduced below: -

<b>Policy GS16 Wavendon Strategic Buffers</b>
<b>Policy type:</b> Strategic
<b>Objectives:</b> 8, 13
<b>Site/sub-area:</b> Wavendon Strategic Buffers
<p>A. Wavendon Strategic Buffers are designated as shown on the Policies Map. Development within these areas will be refused in order to maintain the existing open character between Wavendon and surrounding built development and retain Wavendon's character as a distinct and historic settlement within the wider built-up area of Milton Keynes city.</p> <p>B. Development proposals that enhance the open space function and landscape quality within the Wavendon Strategic Buffers will be supported, providing they do not result in the encroachment of built development into the buffers that adversely impacts their openness.</p>

Figure 1 – table from page 44 of the Regulation 18 MK City Plan 2050

This is objectives 8 and 13.

*Objective 8: Ensure that communities and nature can cope with and bounce back from negative climate impacts and environmental change.*

*Objective 13: Conserve our unique heritage and provide a greater diversity of places where culture can be produced and enjoyed strengthening our role as a national and international centre of cultural and creative significance.*

The policy attempts to meet these objectives by designating the land in question as open space and maintaining this as open space and a local gap into the future as a buffer to protect Wavendon's character. Whilst the proposals are for designation as open space, they do not require that the site or sites that make up the designation are made available for access by the public. Currently there is no right of way over the land interest at Land South of Lower End Road and the current use as a paddock remains. As such it is not considered that Objective 8 would be met on this site by simply keeping the WSB land open.

With regards objective 13 the proposals for keeping the site open as a buffer can only mean conservation of the heritage assets and their setting within Wavendon village – to which the proposed buffer meets only part of this objective too. There are seven heritage assets in Wavendon Village and four closer to the Site in Cross End. Only one of these is Grade II\* Listed being the Parish Church (which is itself 600m from the boundary of the Site) there are no Grade I listed buildings in the vicinity. As such the Land South of Lower End Road is quite distant from the assets concerned and offers little practical 'protection' by being retained as private open space quite remote from the main village envelope. The current boundaries which are marked by significant levels of mature foliage already offer a visual buffer. This is assessed in the accompanying landscape assessment of the two sites – with very few views in or out of the sites at present.

There is no designated conservation area covering the settlement(s) and if the character of these areas was of special historic interest it would have been given designated status. There have been other instances throughout the history of Milton Keynes whereby historic places have been sensitively integrated into the city, such as Bradwell and Milton Keynes village itself. In fact, in some instances this approach has led to design and layout influences from the historic places impacting upon those areas of the city, such as that seen in Linford, which have enhanced and elevated the results places.

Another more recent example of a significant strategic development in the city which abuts sensitive existing settlements is to be found at SEMK, which conjoins the city with Woburn Sands and to a lesser extent Wavendon itself. Again, this strategy is much more in-keeping with how existing settlements have been treated in the city over the past 50 years, by comprehensive spatial planning rather than arbitrary buffers. On this basis

a more inclusive policy would be to combine the GS16 designation with that of GS15 and comprehensively develop the whole of this area.

A landscape assessment of the gap between the villages have been submitted alongside this submission.

The proposal for residential development of the Site and the wider land within the WSB could meet the following objectives of the emerging local plan: -

*Objective 1: Create inclusive and safe places that encourage greater physical activity, social interaction, and healthier lifestyles.*

*Objective 2: Create streets and neighbourhoods that prioritise walking, cycling and wheeling for access to shops, services, community facilities, and parks and open space.*

*Objective 4: New homes and commercial buildings to be net zero carbon by 2030 and carbon negative by 2050.*

*Objective 7: Create space for nature and deliver significant gains in biodiversity.*

*Objective 9: Provide a range of homes for those most in need including affordable homes, and to meet the wider market demand for housing.*

And can contribute to the following ones: -

*Objective 3: Provide a suitable range of facilities and infrastructure in the right places at the right time to promote walkable neighbourhoods and good physical and mental health.*

*Objective 5: New growth prioritises active travel and public transport to reduce carbon emissions.*

*Objective 11: Support delivery of social infrastructure to enable people to prosper and have a high quality of life.*

*Objective 13: Conserve our unique heritage and provide a greater diversity of places where culture can be produced and enjoyed strengthening our role as a national and international centre of cultural and creative significance.*

There is considerably more scope for a sensitive residential development of the site to meet many more of the objectives of the Local Plan and to contribute to several others, than the partial meeting of only two objectives under the current proposals for an arbitrary buffer, which is not supported by the submitted landscaping evidence as part of this consultation. This demonstrates that a sensitively designed scheme, with appropriate landscape buffers can protect the designated heritage assets at Cross End, enhance the existing foliage buffer along the Newport Road and provide an enhanced pedestrian link between Wavendon and Cross End. Development can be provided at densities in line with emerging MK policy, making best use of the land, in parcels which, through and assessment of existing key views, are demonstrated not to impact upon the visual coalescence of the settlements.

It is maybe the case that there is local political pressure to justify the use of this Site as a development buffer – which is the only such use of a designated buffer in the New City Plan 2050. Part of the proposed buffer site has been recently built out as a community centre and recreation ground, therefore its retention in a geographically reduced GS16 is appropriate as these uses will preclude development. It is also some distance away from the Site across the busy Newport Road. MKC has consistently planned for buffers spatially through allocations (most recently at SEMK and MKEast) and to do otherwise here without evidence or justification cannot be considered sound.

GS16 should be split, with land to the south and north of the village retained and with a new policy allocating the land to the east of Wavendon (together sites ref 110523 & 110543). It has been shown above that through the comprehensive masterplanning and development of these sites a number of objectives of the plan would be met, and the gap between settlements can be protected and enhanced by suitable buffers. This is further demonstrated in the landscape work submitted in support of this response to the consultation – with 250 units still achievable with the increased buffers. The Plan should allocate smaller sized deliverable sites, such as these, in sustainable locations which can start contributing towards housing needs within a shorter time period compared to larger strategic sites to diversify supply and increase flexibility.

As the sites are together deliverable without significant additional infrastructure – as demonstrated by the respective transport assessments carried out in support of development – there would be no need to limit development until after 2038 as has been the case with GS15 (albeit we do not support its imposition on any of the Land East of Wavendon).

### **Policy CMK3 Supporting a thriving CMK**

The intensification of Central Milton Keynes (CMK), in a sustainable location and making use of brownfield sites is ambitious and an appropriate location for high rise development. There is uncertainty over the ambition of providing as many as 11,000 new homes in the plan period in CMK. This level of housing in CMK would require a significant sea-change in how CMK is viewed and could take significant time to realise this change.

The submitted Whole Plan Viability Report finds that brownfield flats in CMK are only viable in edge cases with low levels of affordable housing. The result of this is that even with the low 15% affordable requirement, accelerated and/or intensified housing starts for housing in CMK might not be possible to achieve, especially in early years when CMK is not yet considered as a destination in which to live. This impairment of delivery rates for town centre housing should be reflected in the calculation of the necessary numbers of allocations required to meet the stated delivery targets.

We suggest that the densities are viewed again in light of this and the recent appeal<sup>1</sup> site for development of tall buildings in the central area which is at a much higher density of circa 1,200 units per ha than those stated in the draft local plan (max 430 units per ha) and still could not provide on site affordable provision at an acceptable rate. The inspector accepted an offsite contribution to affordable housing in this instance, however, it is clear that the viability concerns highlighted in the viability report are very real in light of this evidence.

### **Policy PFHP5 Designing People Friendly Places**

The draft text makes reference to area-based design codes, whereas the guidance from central government via the draft NPPF is that site-based design codes are the best way to guide development. We would agree on this as area wide design codes can be generalist and can hinder delivery and require significant evidence if departure is needed, whereas a site-specific design code can be more targeted and better aids delivery.

### **Policy PFHP6 Designing Healthy Streets**

The draft text is very prescriptive and could prove to be divisive for some schemes – especially if significant constraints dictate the layout of built development. This level of proscription can also lead to developments which are indistinguishable from one another. We suggest that the first sentence is re-drafted to say: -

*'Development proposals will be permitted if they follow the guiding principles and where they do deviate this must be evidence based.'*

This will allow for sites which can more easily follow the guidance to do so and those that cannot, due to the constraints upon them, can demonstrate through sufficient evidence why they do not. This will aid timely delivery.

---

<sup>1</sup> Appeal reference: APP/Y0435/W/24/3338221

### **Policy PFHP7 Well-designed buildings**

The draft text is sufficiently flexible for well-designed buildings of all types to come forward.

### **Policy HQH2 Affordable homes**

The level of affordable requirement and mix has been informed by the whole plan viability study. Whilst some of the figures and assumptions made in the viability study are questionable it is understood that a benchmark has to be reached and that there will inevitably be some difference of opinion. The conclusions are considered to be in-line with our expectations and there is scope within the text for some flexibility when viability is challenged, in line with national policy.

### **Policy HQH3 Supported and specialist homes**

The requirement for strategic sites to provide a minimum of 17.5% of total homes as supported and/or specialist homes could impact upon viability of schemes, especially in instances where 40% of homes are also affordable. There is also not sufficient clarity in the definition of these types of homes and how they compare on a 1:1 basis (is a single care home space a 'home'?)

This should be reduced in scope to requiring a proportion of specialist homes to contribute to the assessed needs of the Council.

### **Policy HQH9 Exception sites**

The adopted Plan:MK does not cap the size of the land parcel or number of units for exception sites. This allows for greater flexibility for rural exception sites to come forwards to meet the real identified local for affordable housing. The proposals under draft policy HQH9 to limit the scale of development to 0.5ha or 10 homes is potentially harmful to future delivery to meet the needs of residents of the authority and the current under supply of Affordable Housing.

The text should be changed to remove the restrictions on size and should instead be 'compatible and of a scale with the existing settlement'.

### **Policy CEA1 Sustainable Buildings**

The draft text includes the phrase '*latest net zero energy generation of technologies*', such terms are open to interpretation and can lead to uncertainty for developers. We suggest this is removed from the text to aid deliverability.

The proscriptive levels of energy use and limits on whole lifecycle carbon requirements in C.1-3 could impact upon delivery though it is recognised that limb D should allow for some flexibility where these targets cannot be achieved. We believe a range of EUI could be introduced to the text that could allow for greater flexibility for schemes to meet acceptable targets.

### **Policy CEA5 Water Efficiency**

The proposed figure of 80 litres per person per day is very low – is there any evidence that this level of use is achievable in the real world. We suggest that developments of all sizes target 100 litres per person per day.

### **Other considerations**

Universal studios - Bedfordshire

The recent announcements have been made by Universal Studios that they have purchased a significant site of around 400 acres with an option to expand to build a new theme park around 15 km to the east of the Site. This will target on the order of 2-3 million visitors per annum and could employ several thousand local people. This development will put significant additional pressure on housing in the area, both during construction and once opened. With eastern Milton Keynes being just 20 minutes from the site there will be increased pressure on housing need if this scheme does come forward.

We suggest that the emerging housing needs are reviewed in light of this development as the plan progresses and the likelihood of it comes forwards also progresses.

### *Collaborative Working*

The assessment of the Site and the adjacent site, Land off Newport Road Wavendon, in the SHLAA accompanying the Reg 18 consultation makes it clear that the sites would benefit from consideration as part of a wider development. The promoters of both sites have a good working relationship and have communicated for a number of years. We submit alongside this consultation response a recent landscape plan which demonstrates how the two sites could come forwards with a shared active travel link between them. The series of plans demonstrates how the sites are contained, both from each other and the surrounding views into the sites – of which there are very few.

The landscape note provides a detailed assessment of the two sites. It concludes that the site whilst remaining open does not relate closely to either Wavendon or Cross End and does in fact relate to the newer developments to the north, given the way the site is largely screened by mature vegetation. The wider landscape is characterised by a mosaic of older and newer pockets of development and keeping the site open does not serve to integrate into this setting.

This assessment concludes that the two sites 110523 & 110543 can be developed sensitively without having a detrimental impact upon the gap between Wavendon and Cross End. Also, a suitable buffer around the net developable area, in combination with the retained mature boundary trees and vegetation, would help protect the limited the views in and across the site, including those from the important heritage assets at Cross End. By masterplanning the wider site, development would make both best use of the land in a sustainable location whilst contributing to more of the objectives of the local plan then taking the extraordinary step of introducing a buffer on the whole of the site and the wider land beyond as proposed under GS16.

The Land South of Lower End Road represents an immediately available, suitable, achievable and therefore entirely deliverable option for residential development with no physical, legal or environmental constraints.

I trust that the above submission provides a useful contribution to the process, however, should you have any points of clarification or require any further details please do not hesitate to contact me at the above address.

Yours faithfully

**John Gale MSc, L-RTPI**  
**Senior Planner**

Copy: Clients

Encl: As listed above



**VISION DOCUMENT**  
LAND TO SOUTH OF LOWER END ROAD, WAVENDON

APRIL 2022

---

## Contents

---

<b>1. Introduction</b>	<b>3</b>
<b>2. Executive Summary</b>	<b>4</b>
<b>3. Site Context</b>	<b>5</b>
Location	
Facilities and Amenities	
Planning Context	
<b>4. Environmental Considerations</b>	<b>8</b>
Landscape and Topography	
Ecology	
Visual Impact	
Transport Access and Facilities	
Archaeology and Heritage	
Water Management	
Servicing	
Key Plan to Photographs	
<b>5. Constraints and Opportunities</b>	<b>16</b>
<b>6. Framework Plan</b>	<b>18</b>
<b>7. Conclusion and Summary of Benefits</b>	<b>19</b>

# INTRODUCTION

This vision statement sets out how the Land to the South on Lower End Road Wavendon could deliver around 60 high quality new homes to support the local council's vision for sustainable development across Milton Keynes, and would contribute to meeting the housing needs in the early phase of the plan period. The proposals have been developed following a thorough investigation of the site to support positive growth in Milton Keynes and housing delivery.

In this statement we set out how the site:

- Provides a logical and sustainable place for the strategic expansion of Milton Keynes;
- Demonstrates a realistic and deliverable scheme; and
- Will enhance the green and landscape of the surrounding area.

This report has been informed by a methodical process taking into account:

- Assessment: consideration of the full context including physical, social and economic characteristics of the site and it's surroundings, as well as planning policies and best practice;
- Evaluation: demonstration of how the information gained from the assessment process has been evaluated to inform the development of the scheme; and
- Design: identifying and explaining how the sites layout, landscape and scale will make a positive contribution to the surrounding landscape and environment.

The site has few constraining features, but these have been clearly considered in the proposals for the site. We have undertaken a thorough consideration to landscape, water management and habitats.

Accompanying or part of this document are technical reports on:

- Planning issues;
- Landscape;
- Ecology;
- Flood Maps and Water Management
- Highways.

We hope this evidence base supports the successful promotion of the site through the Milton Keynes Council Call for Sites and Local Plan Process. If the site is successful in its promotion, there will be a programme of technical work which will be submitted to support the successful delivery of the proposals outlined within this document.



Fig no. 01, Aerial photograph showing site location in context. (© Getmapping PLC 2022)

# EXECUTIVE SUMMARY

## HOUSING DELIVERY

The site will support housing delivery of:

- Around 60 new homes; and
- A mix of dwellings to respond to local needs.

## SUSTAINABILITY

The location of the site will support sustainable and healthy lifestyles because:

- The site adjoins strategic extension of settlements in Milton Keynes with existing / expanding facilities and amenities; it is close to other areas of Milton Keynes for higher order services;
- Two new purpose built schools have recently been built for the settlement to the north of Lower End Road known as Glebe Farm and the wider area south of the A421;
- Bus stops are a short walk or cycle to the west of the site, providing fast, reliable public transport to central Milton Keynes and the wider urban areas, coach and rail services; and
- In the longer term Milton Keynes plans a Mass Transport System and this locality is a priority area to be provided with such service.

## ENVIRONMENTAL AND LANDSCAPE ENHANCEMENTS

The site is visually contained and therefore the visual impact of development is likely to be limited; however, where views are possible these can be mitigated with the proposed landscape structure of the site. The proposals in this document reflect a landscape led approach to development, increasing pedestrian access and building on the existing landscape character of the area by:

- Retention and enhancement of the existing vegetation structure, including the trees;

- Provision of a suitable green buffer to the sensitive boundaries ensuring appropriate development set-back is achieved;
- Creating a positive landscape setting throughout the site; and
- Improving public access to walking routes to neighbouring strategic development areas.

## ECOLOGY AND ENHANCEMENTS

The proposals in this document consider the local ecology and look to enhance it, including:

- The scheme does not involve the removal of any substantial or protected trees;
- Planting of new shrubs selected to encourage wildlife will be designed into the scheme to offer seasonal variety and improve the ecological value of the garden;
- The new areas of open space will add further to this biodiversity; and
- Additional landscaped corridors are proposed within the development itself.

## SITE CONTEXT / LOCAL CHARACTER

The development proposals would build on the distinctive character of the historic Wavendon village and new settlements to the North and West, to create an extension that feels like a well considered and integrated part of the area by:

- Building on the distinctive character, taking cues from the surrounding area; and
- Looking at the local vernacular housing which is predominantly red brick and painted render with both slate and plain clay tiles to roofs.



Fig no. 02, Aerial photograph showing site location. (© Getmapping PLC 2022)

## VISION DOCUMENT

Land to South of Lower End Road, Wavendon

# SITE CONTEXT

## LOCATION

The site is located within the South-Eastern edge of Milton Keynes, and comprises a total area of approximately 2 hectares. There are existing settlements to the West of the site at Wavendon, to the South of the site at Woburn Sands, and to the immediate South the hamlet of Cross End, these are villages pre-dating Milton Keynes. Further West are Wavendon Gate and Old Farm Park and the classic infrastructure of the Milton Keynes grid squares. To the North is the Glebe Farm housing development and schools currently being built, and beyond the A421 the large warehouses of Magna Park. To the East is Wavendon Golf Course, small hamlets, and the M1. The site is currently used as a paddock.

The boundaries of the site, currently used as a paddock, are formed by Lower End Road to the North, Cross End to the East, large gardens of existing houses to the South, and fields to the West which are a potential housing development site.

## FACILITIES AND AMENITIES

The site is well served by local facilities and amenities including:

- St. Marys Wavendon CE Primary School has recently opened to the North East of the site and the soon to be completed Glebe Farm Secondary School sits directly North of the site. Both schools form part of the Glebe Farm/ Eagle Farm/ land south of A421 developments;
- The number 3 bus route runs East / West along A421 Standing Way from Kingston to Magna Park every 20 mins. The number 34 bus route run North/South from Kingston to Woburn Sands Rail Station hourly. There is also a local community bus on a Monday and the 'MK Connect Dial-a-Bus' service which call at Lower End Road. The stops are less than 1km from the site;
- There are 3 convenience stores nearby in the Walnut Tree local centre, and at the BP garage on the A421.
- The site sits very close to the Kingston District Centre with its large Tesco supermarket and other shops, including pharmacy and dry cleaners, a library, a number of cafes and eateries and also fitness facilities is 1km away.
- Two large garden centre / retail complexes sit to the South of the site with a wide offering in terms of gardening, produce, cafes and homewares.
- There are local pubs in Wavendon, Walnut Tree and Woburn Sands, and the Stables theatre a short distance away for entertainment.
- The closest Doctors surgeries are in Kents Hill and Woburn Sands, each just over mile away from the site;
- In addition, nearby ongoing developments continue to offer additional local facilities which are accessible to or in close proximity of the site;
- There are a number of employment areas close to the site, including Wavendon Gate Business Park Brinklow and Kingston Industrial and Business Parks, Prologis Magna Park and Woburn Sands centre and industrial area;
- This is also a general area of Milton Keynes identified as a priority location for servicing by any new Mass Transport Systems that are to be provided across the Milton Keynes area.

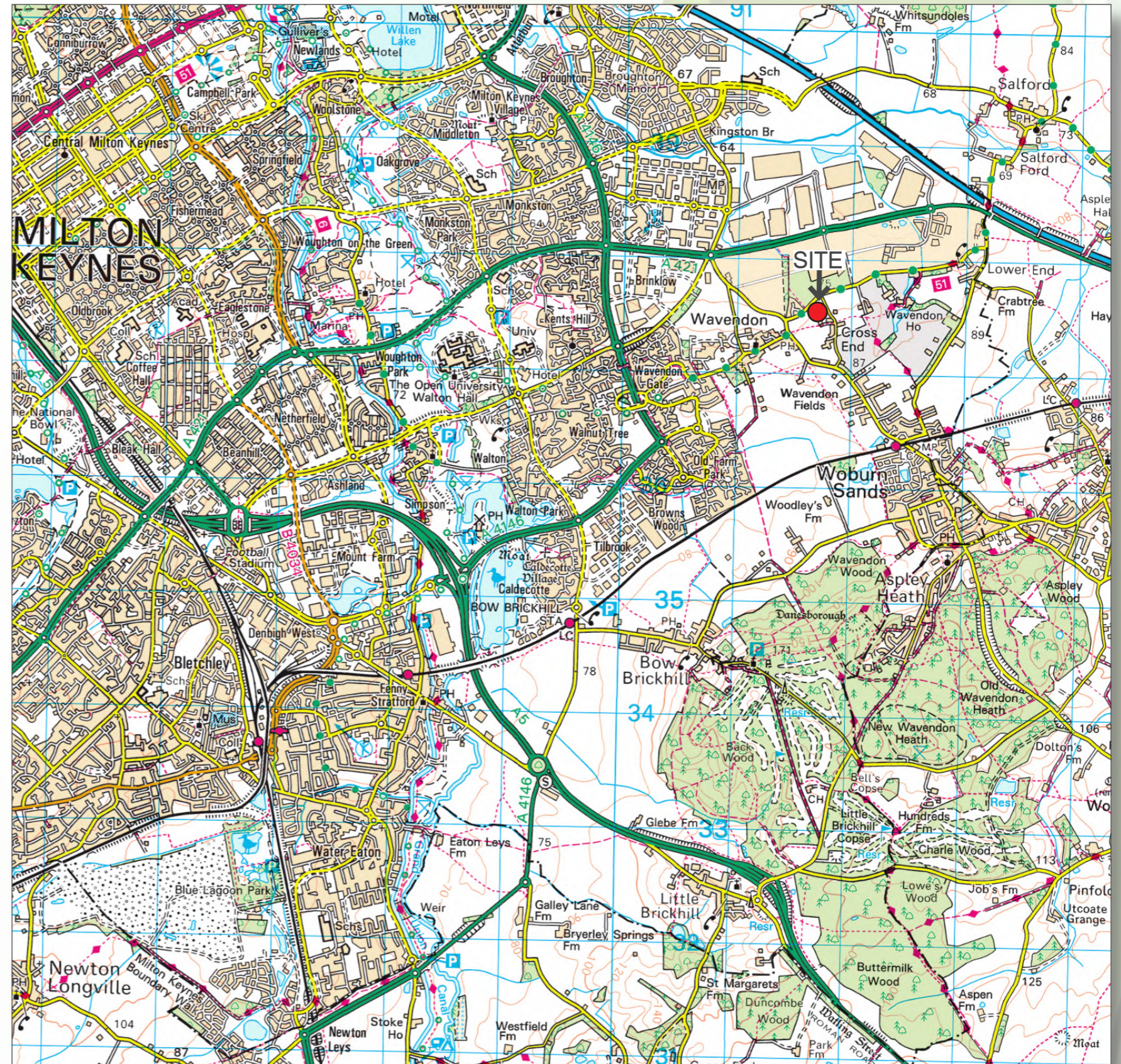



















Fig no. 03, Map showing Site in the context of Milton Keynes. (© Ordnance Survey 2022)

## VISION DOCUMENT

Land to South of Lower End Road, Wavendon

# SITE CONTEXT

## FACILITIES AND AMENITIES KEY

-  Site Boundary
-  Motorway, Dual Carriageway Road
-  Major Road
-  Minor Road
-  Active Railway and Station
-  Bus Stops
-  Major Redway, Pedestrian and Cycles
-  Pedestrian Walking Distance
-  School, 1\* Primary, 2\* Secondary
-  Doctors Surgery
-  Community Uses (Pavilions, Halls, Post Office, Theatre)
-  Leisure and Recreation Uses (Playgrounds, Sports facilities, Theatre)
-  Retail Uses (Local shops, Mixed use, Supermarkets, Garden Centre)
-  District or Local Centre Area
-  Public Houses
-  Employment Areas
-  Listed Buildings

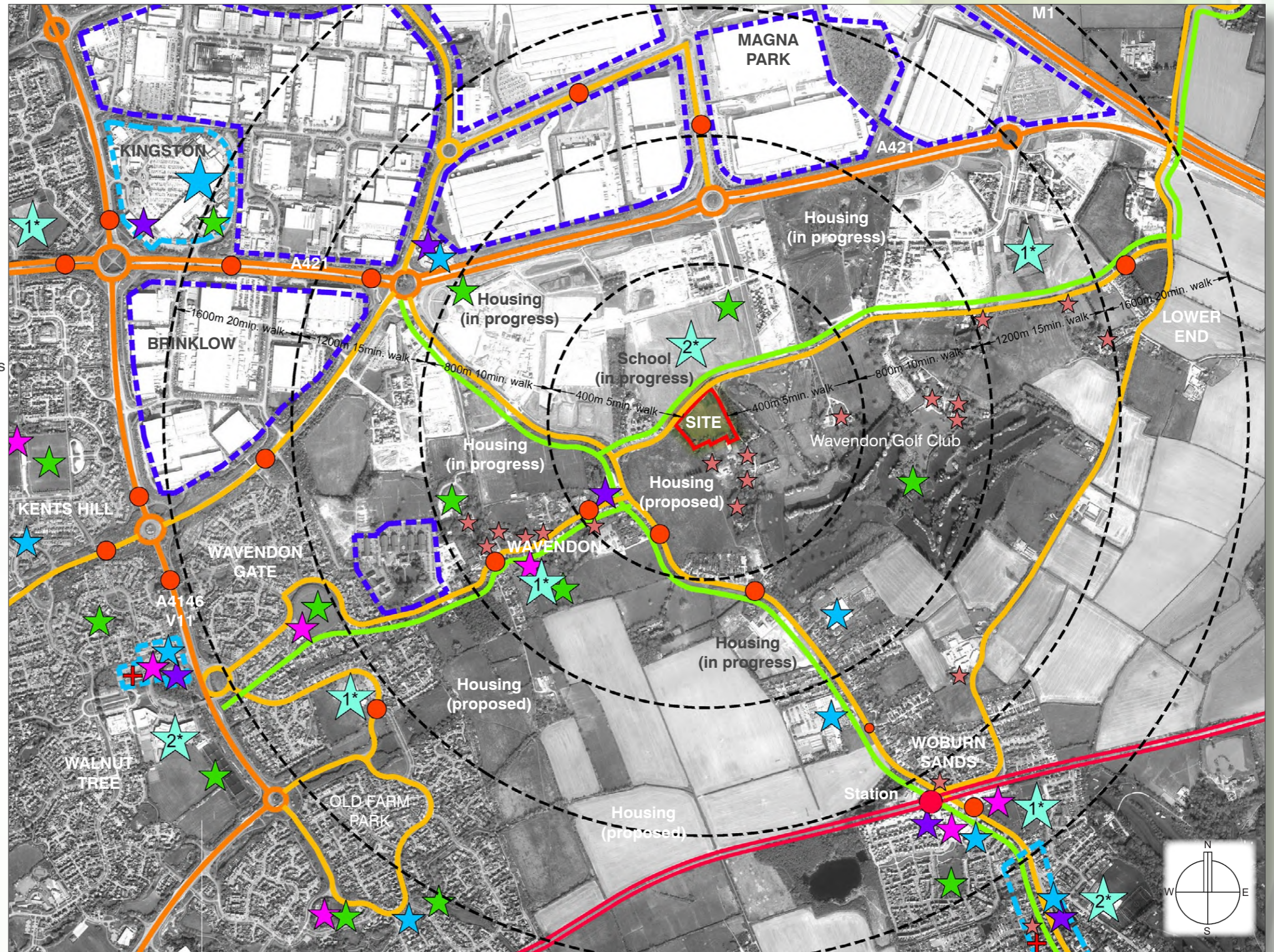


Fig no. 04, Aerial photograph showing existing site context, open space, facilities and amenities. (© Getmapping PLC 2022)

## VISION DOCUMENT

Land to South of Lower End Road, Wavendon

# SITE CONTEXT

## PLANNING CONTEXT

Plan: MK was adopted by the Council in March 2019, covering the period 2016 to 2031. The Site is within Policies Map Sheet 4 and is identified as Open Countryside within the Milton Keynes Boundary. Land to the west is also Open Countryside whereas land to the east is identified as recreation and open space.

However, the site lies in an area identified for potential strategic development in the MK:2050 Futures report and is close to the proposed routes of the new H10 Grid Road extension and therefore although currently considered to be open countryside is now anticipated to form part of strategic expansion of Milton Keynes.

Residential development of the Site is considered to be deliverable within the proceeding years one to five, for reasons explained in the accompanying Planning Statement and hence the Site should be identified within the emerging local plan or where relevant within an emerging neighbourhood plan for residential development.

Paragraph 69 of the NPPF states that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should undertake the steps set-out in this paragraph, including working with developers to bring forward deliverable sites.

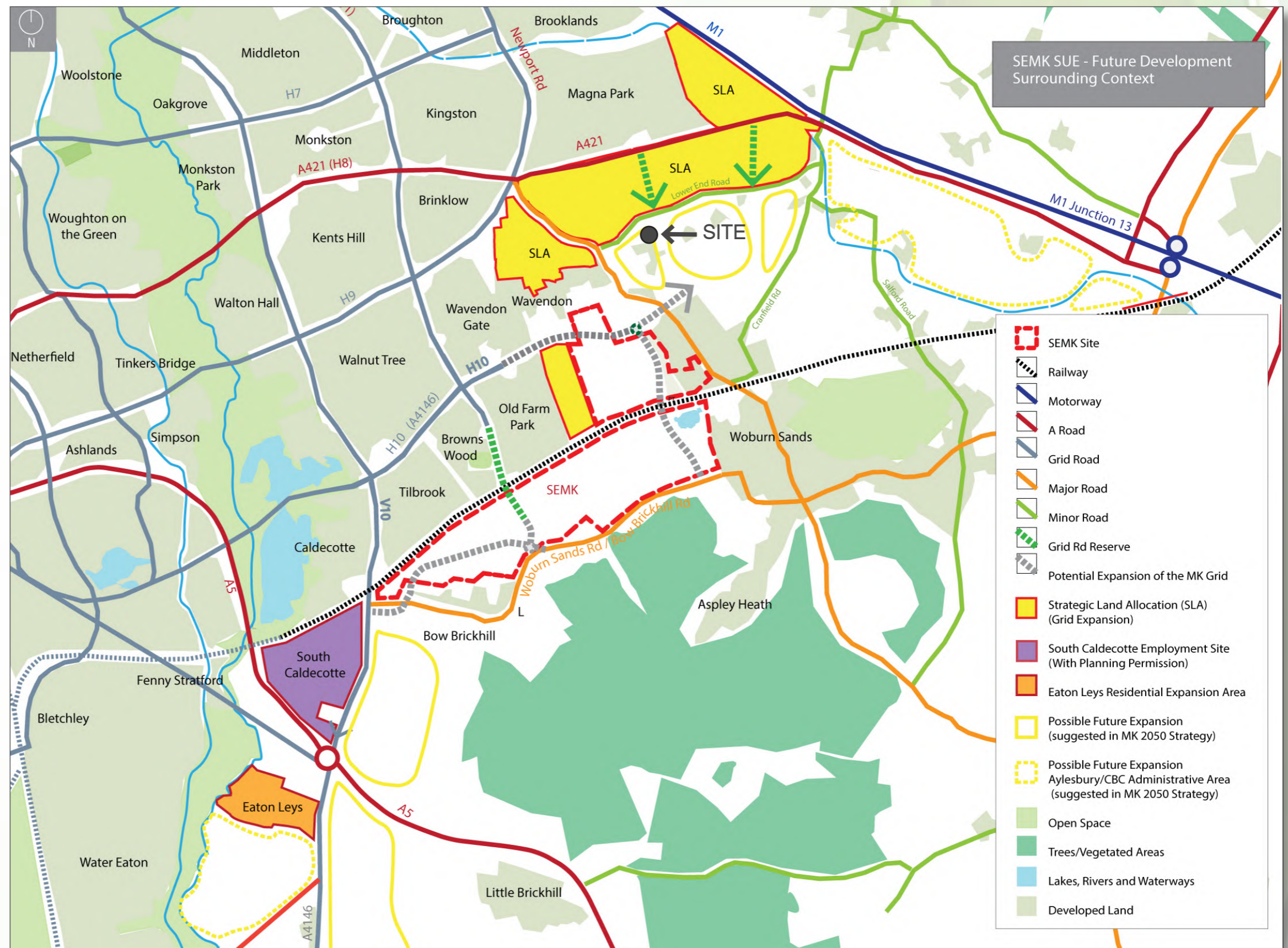


Fig no. 05, Future Development Surrounding Context, taken from SE MK Strategic Urban Extension Framework, page 22, diagram 2.1 (© Milton Keynes Council 2021)

## VISION DOCUMENT

Land to South of Lower End Road, Wavendon

# ENVIRONMENTAL CONSIDERATIONS

## LANDSCAPE & TOPOGRAPHY

The site's landscape setting is defined by the gently undulating landscape with hedgerows on all sides of the site.

The site has a sense of enclosure with slightly sloping topography, established hedgerows and other features which define the character of the site, with several mature trees incorporated in hedges which form the borders on each side.

The site has been in pony paddock use for many years and has limited biodiversity. The vast majority of existing landscape features, such as trees and hedgerows, will be retained. The loss of a limited number of existing trees hedging will be compensated for by extensive native tree planting across the site. Gaps in hedgerows will be replanted with a species rich mixture of native hedge planting and a central corridor will be planted / landscaped to define it as a natural open space and pathway route.



Fig no. 06, Photo from adjacent housing site showing hedgerow to Western boundary of site.



Fig no. 07, Photo from adjacent housing site showing hedgerow to Western boundary of site.



Fig no. 08, Photo from Lower End Road showing significant tree and hedgerow to Western boundary of site.

# ENVIRONMENTAL CONSIDERATIONS

## ECOLOGY

The site is not subject to any ecological designations. The on-site habitats are dominated by species-poor semi-improved grassland, with species-poor hedgerows, scrub and a tree line forming the boundaries. The habitats identified are unremarkable and are typical of the surrounding landscape. Nonetheless, the hedgerows and tree line qualify as Priority Habitats and shall be retained and buffered from development wherever possible.

### BATS

Bats are likely to make use of the site for incidental foraging and/or commuting, however overall bats are unlikely to represent an overriding constraint to development of the site, with any required mitigation likely to be readily incorporated into the proposed development. The opportunity exists to deliver net gains for bats through new roost creation, e.g. bat boxes.

### GREAT CRESTED NEWT

Seven off-site ponds lie within 250m of the site, including one pond located approximately 10m to the north of the site. Given that Great Crested Newt has previously been recorded within

the off-site ponds, and that suitable foraging and sheltering opportunities are present within the site, for current purposes it should be assumed that GCN are likely to use the site to some degree and therefore mitigation will be required. Specialist advice suggests it would be best to register the site under MK's District Level Licence for GCN.

### NESTING BIRDS

The hedgerows, tree line, and scrub are suitable for nesting birds, however subject to suitable precautions being implemented during the removal of any suitable vegetation during the bird-nesting season, birds are unlikely to represent an overriding constraint to development. The opportunity exists to deliver net gains for birds through new nest site creation, e.g. bird boxes.

In summary, the Phase 1 habitat survey identified the presence of habitats within the site that offer limited potential to support bats, Great Crested Newt and nesting birds. There are no ecological issues that would be an overriding constraint, albeit further surveys will be required to inform a detailed assessment as part of any future planning application.



Fig no. 09, Photo from Lower End Road showing pond and Southern boundary to school site.



Fig no. 10, Panoramic Photo from Lower End Road entrance showing site extents.

## VISION DOCUMENT

Land to South of Lower End Road, Wavendon

# ENVIRONMENTAL CONSIDERATIONS

## VISUAL IMPACT

As part of the investigation of the site a high level landscape and visual impact assessment of the site has been undertaken. The present landscape features already minimises the impact on the wider existing landscape setting. Planting along site boundaries will reduce the visual impact of the development by filtering views of built form, helping to assimilate the development into the surrounding landscape.

Views of the development from the surrounding wider landscape will mainly be from the Lower End Road direction across from school playing fields on the north of the site – with this in mind there are currently both opportunities to retain a heavily landscaped frontage on the north boundary, thereby screening much of the view into the site, or to adopt an active frontage approach much like the developments on the other side of the road and detailed discussion with planning and landscape officers will determine which is the preferred solution in this case.

The assumption illustrated in the current masterplan is for a screened solution which retains much more planting on the northern boundary and contributes to the biodiversity net gain aspirations of the development. This approach still provides glimpsed views of buildings set within the wider landscape which would be wholly in accordance with the character of the existing settlement Cross End settlement on the southern boundary of the site. Should an application ultimately be progressed.



Fig no. 11, Photo of new apartment building to the corner of Newport Road and Lower End Road.



Fig no. 12, Photo of the school across the playing fields from Lower End Road.



Fig no. 13, Photo of The Gables housing from Lower End Road.



Fig no. 14, Photo of The Gables housing and Lower End Road from the redway.

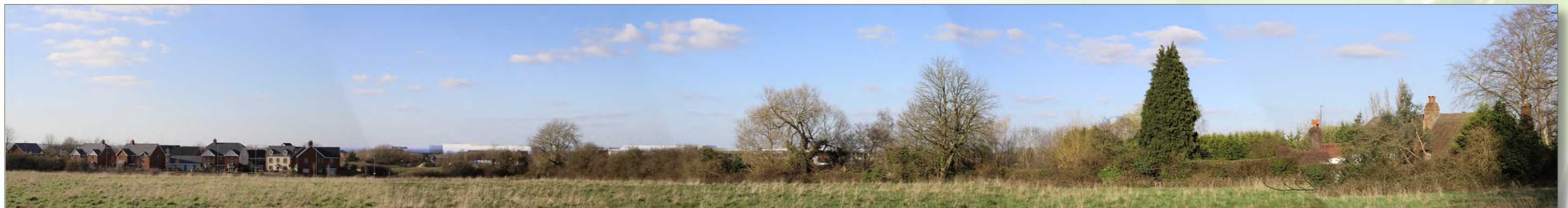


Fig no. 15, Panoramic Photo from adjacent housing site from Newport Road showing The Gables housing, school with Magna Park beyond, Western boundary to site and Cross End existing houses.

## VISION DOCUMENT

Land to South of Lower End Road, Wavendon

# ENVIRONMENTAL CONSIDERATIONS

## TRANSPORT ACCESS AND FACILITIES

The site is well located to access a range of facilities by the most sustainable modes of transport. The proposals in this document consider the local pedestrian, cycle, vehicle and public transport connections and look to enhance it. Considerations include:

- Most day-to-day needs are available within walking distance of the site;
- The facilities available within cycling distance greatly increases. These will include the district centre at Kingston, the main shopping centre in Woburn Sands and a range of employment;
- A redway runs alongside Lower End Road giving ready access to high quality infrastructure for pedestrians and cyclists;
- A regular bus service is available a short distance from the site;
- The railway station at Woburn Sands is within walk and cycle distance and Central Milton Keynes Station is accessible by bus; and
- Vehicular access to the required standard can be provided off Lower End Road.



Fig no. 16, Photo along Lower End Road from Cross End junction.



Fig no. 17, Photo along Cross End from Lower End Road junction.



Fig no. 18, Photo along Lower End Road from site access point.



Fig no. 19, Photo along Lower End Road from The Gables housing towards site entrance, with redway.

# ENVIRONMENTAL CONSIDERATIONS

## ARCHAEOLOGY AND HERITAGE

The site appears void of anything of archaeological or historical interest and there are no listed or ancient structures recorded on site.

The available Historic Environment Records (HER) evidence locally suggests limited evidence for any Prehistoric, Roman, Saxon or Medieval archaeological assets in the surrounding area. To assess the survival and extent of any archaeological remains on site, further investigations will be considered prior to any development.

There are two Grade II Listed Buildings whose curtilage abuts the site to the South of the site. These are both C18 thatched cottages called Cross End Cottage at 2 Cross End Road, and Wavendon Cottage at 4 Cross End Road. Cross End Cottage has recently had 2 houses built within its curtilage and large garden. Wavendon Cottage sits to the South of its site some 60m from the development site boundary.

Photographic studies show that neither cottage has views over the application site and sit behind established hedgerows, but extra care will be made when positioning new properties near them. Furthermore, additional buffer landscaping will be considered along the boundaries within these locations if deemed appropriate. This will be investigated more fully when detailed proposals are considered, and the impact of the proposals will be assessed in the context of the significance of the adjacent heritage assets.

It is worth noting here that planning permissions have been granted for a number of small housing developments close to other Listed Buildings in Cross End, e.g. Wavendon Manor / Cross End Cottage and others. This demonstrates a similar approach to that which has been followed around other pre-existing settlements in the wider Milton Keynes designated area over a number of decades, being that of acceptance that Listed Buildings can sit comfortably alongside new housing developments, Milton Keynes Village being one of a number of examples.



Fig no. 20, Photo of new house in garden of Listed Cross End Cottage.



Fig no. 21, Photo of Grade II Listed Cross End Cottage.



Fig no. 22, Photo of Grade II Listed Wavendon Cottage.



Fig no. 23, Panoramic Photo from site of the Southern site boundary showing existing trees and hedgerow, and Cross End existing houses beyond.

# ENVIRONMENTAL CONSIDERATIONS

## WATER MANAGEMENT

### FLUVIAL FLOODING

Following review of the Environment Agency Flood Maps it can be concluded that the site sits outside of any flood zone areas and is Flood Zone 1.

### PLUVIAL FLOODING

The EA risk of flooding from surface water map shows the site is identified as an area of very low risk of surface water flooding. There is a small area of low risk located further South along Cross End where there are some ponds. This will not impact upon the proposed development. The development proposals would include new drainage networks and SUDS infrastructure to positively manage water across the site.

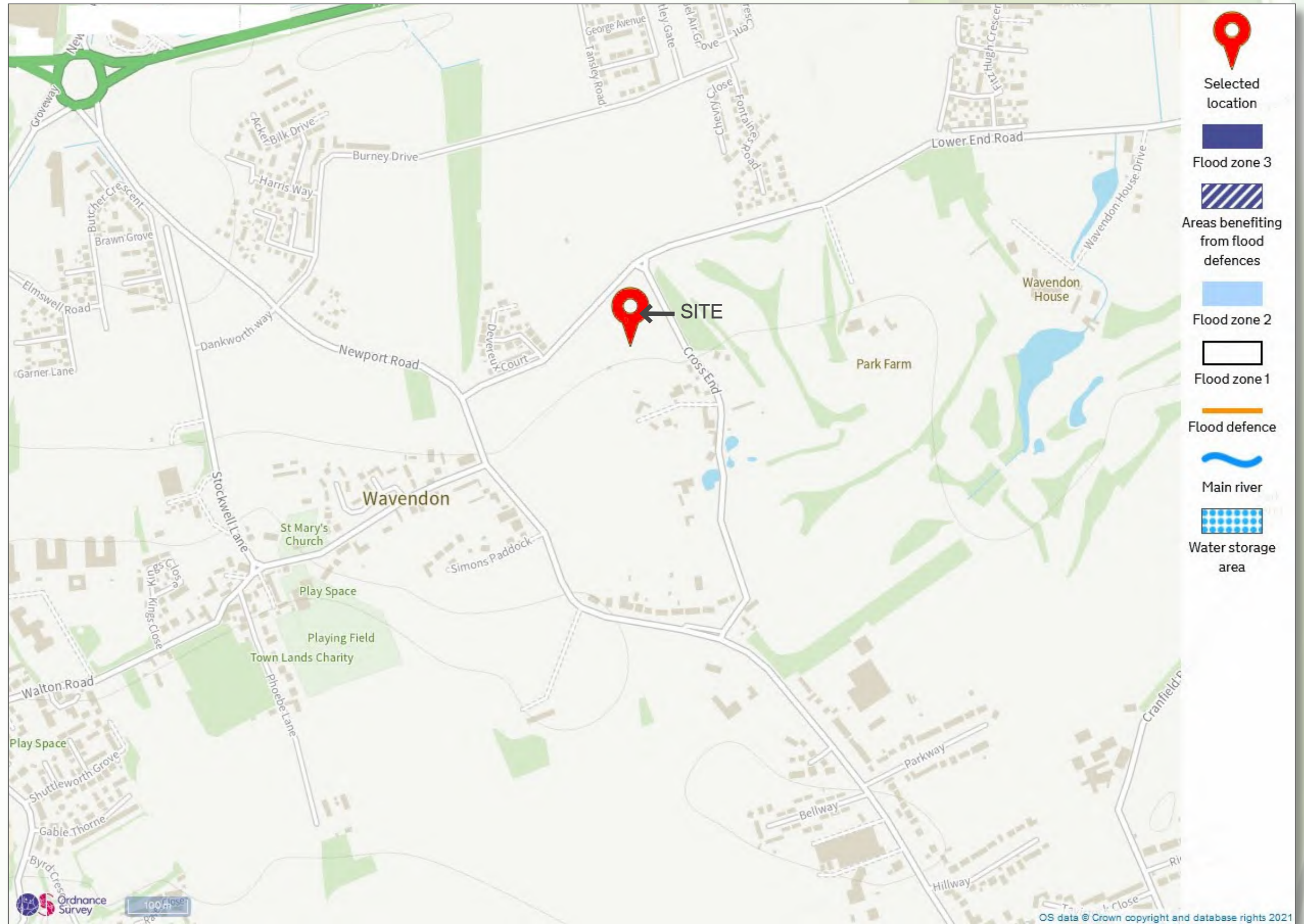


Fig no. 24, Flood Map for Planning from Environment Agency Website. (© Ordnance Survey 2021)

## VISION DOCUMENT

Land to South of Lower End Road, Wavendon

# ENVIRONMENTAL CONSIDERATIONS

## SERVICING

In respect of mains services, all are available in the vicinity, see summary below:

- There is a LHP gas main crossing the site diagonally from the south west corner to the north east corner of the site as indicated by the grey dotted line on the constraints plan. The operator of the pipeline is Scotia Gas Networks who have confirmed that a 6m easement protects the line of the pipe below the surface and prior to any excavations close to the pipeline being undertaken a prior approval procedure applies and that the pipeline has a building proximity distance ('BPD') applying to it. No buildings may be constructed over the 6m strip (or 3m either side of the centre-line of the pipe itself) and roadways crossing the pipeline, excavations/ foundations near to the pipeline, or other services etc.. crossing will require the details to be agreed with SGN in advance. The site framework plan has been developed to create a layout which not only accommodates the easement strip but embraces the opportunity this creates to provide a green space and wildlife corridor throughout the site. Careful consideration has been given to limit the need for road crossing / turning points and there is ample space set aside to run services and paths parallel with, but not entirely within the BPD or easement zone itself.
- There is a Foul Main sewer crossing Lower End Road close to the local pumping station and within 180m west of the site entrance, alternatively (dependant on levels) an additional or alternative connection point is available where the sewer is located as it directs towards Cross End Lane and at that point is within 100 / 150m of the site and easements will be available from at least one 3rd party landowner on that optional routing.
- Potable water is available from either public mains in Lower End Road close to the pumping station (and now extended as a result of the Gables development) within 200m of the site entrance, or another water main in Cross End, the latter being the least favoured option due to limited capacity.

- Gas would be available if required (given pending carbon reduction and green energy legislation a decision on its use for the development will be made at a later date) SGN have indicated that a supply could be provided from a local medium pressure main which runs along the eastern boundary of the site in Cross End Lane at a viable cost with reinforcement and a localised pressure reduction/ governor set.
- Electricity is available in the area as both 11KV and LV supplies, the most convenient connection points are an existing 11KV supply to the sub-station on Cross End Lane approx. 100m south east of the site, or where the 11KV cables traverse Lower End Road around 60m from the north east corner of the site.
- BT / Telecoms cables are in the verge on the north side of Lower End Road opposite the north boundary of the site / site entrance.
- Surface Water drainage – the current nature of the site is almost 100% permeable and drains towards the ditch watercourse to the north of the site. Residential development increases impermeable area however, the surface water flood maps show there is a risk of low risk of flooding from the ditch watercourse and this has the channel capacity sufficient to convey the extreme flows. Given the LLFA's desire to limit surface water outflows consideration has been given to both SUDs and infiltration solutions for the site. Detailed design software will be used to determine the sizing of primary attenuation provided by two balancing which will also accommodate the storage during a number of anticipated peak scenarios agreed with AWA and the LLFA at the detailed design stage. As necessary a hydro-brake to restrict flows from the site can be added but preliminary work indicates that because the site lies within flood zone 1 (low risk) it appears to be practical to design a system without compromising the existing drainage network.

At detailed design stages a number of the services coming from the west of the site along Lower End Road may offer opportunities to be combined in a common services trench with standard details.

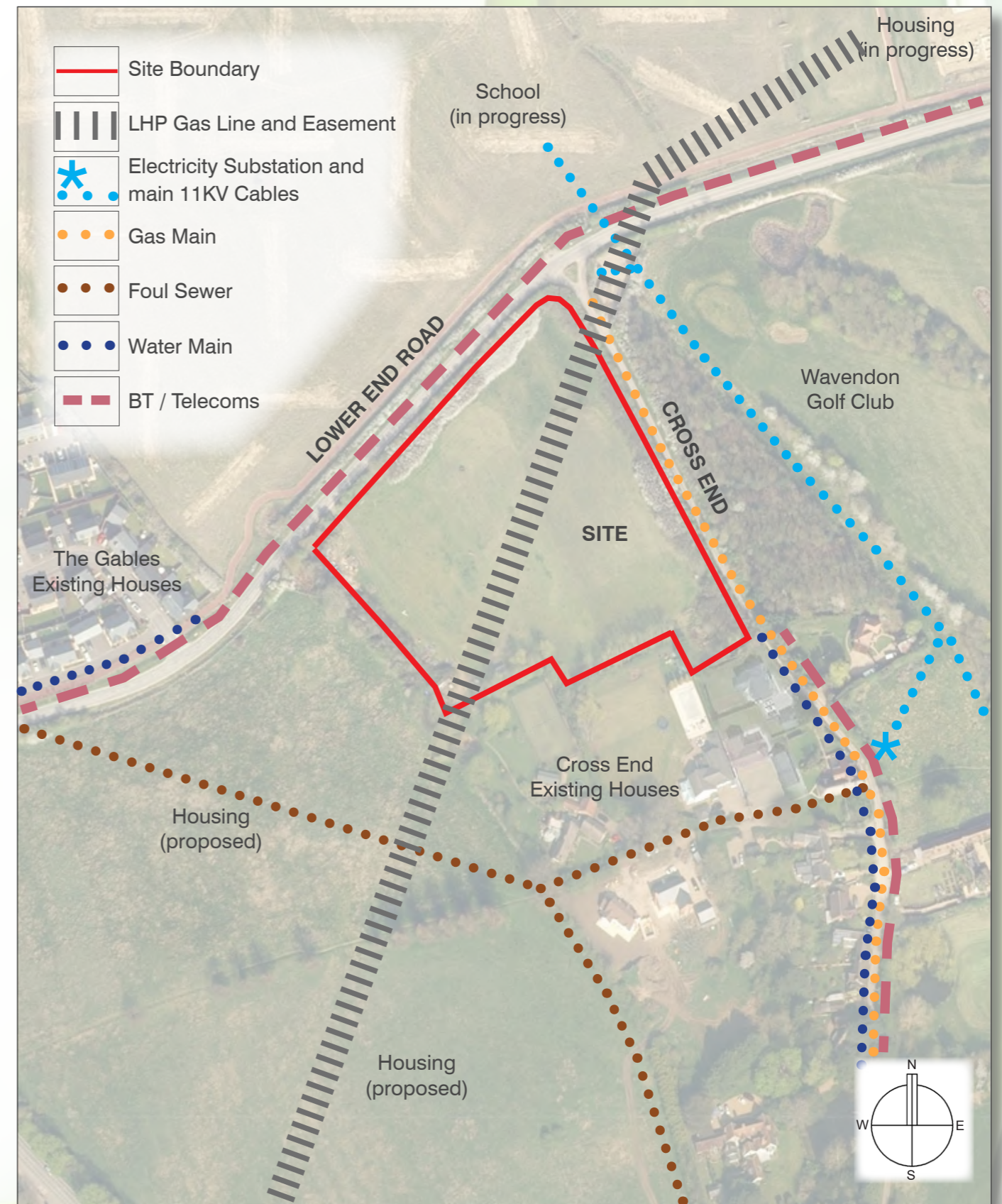


Fig no. 25, Aerial photograph highlighting servicing routes. (© Getmapping PLC 2022)

# ENVIRONMENTAL CONSIDERATIONS

KEY PLAN TO SHOW PHOTO LOCATIONS

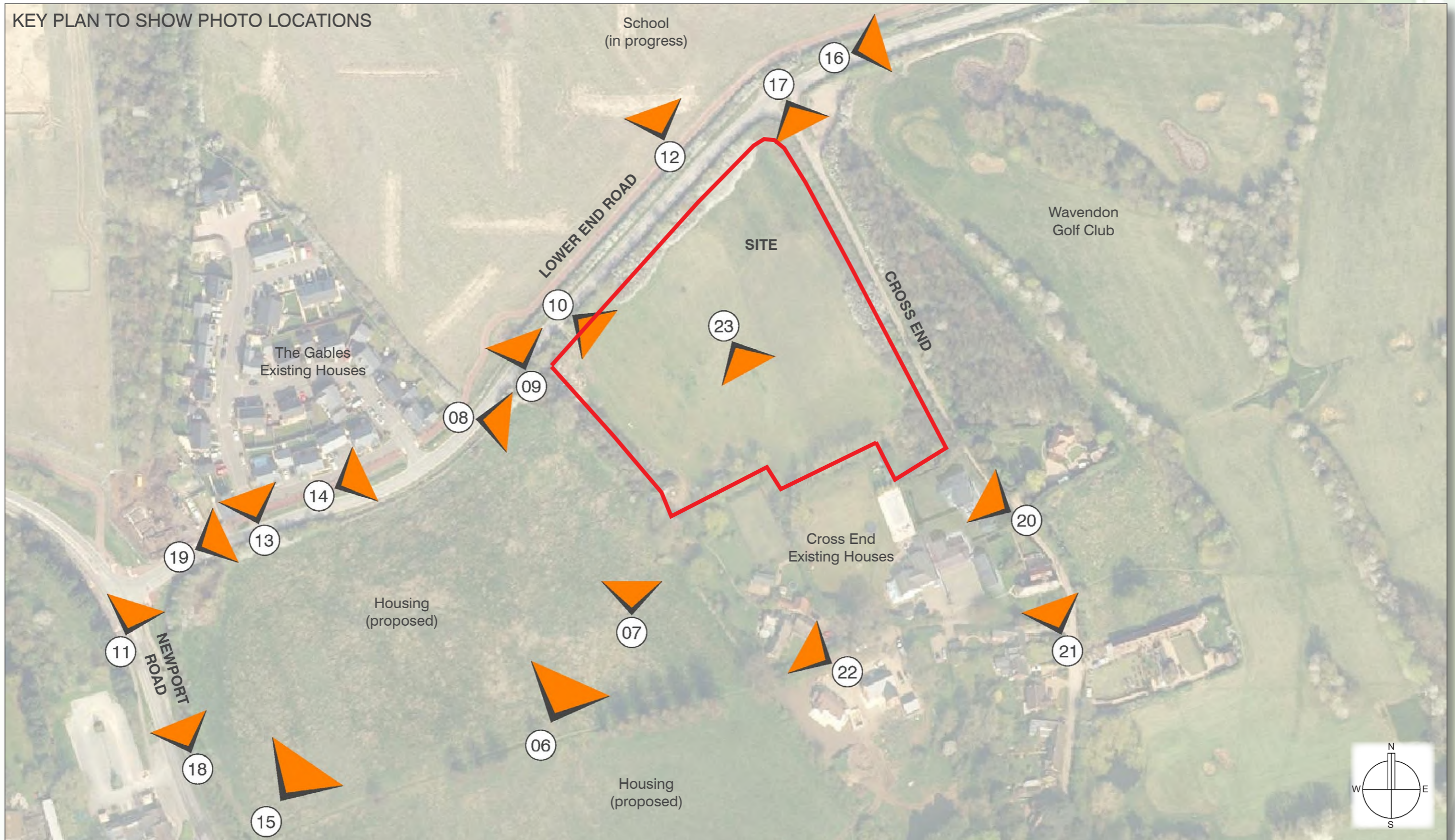


Fig no. 26, Key plan on aerial photograph showing photographic locations through document. Number refers to relevant figure number. (© Getmapping PLC 2022)

---

## CONSTRAINTS AND OPPORTUNITIES

---



















A site analysis supported by technical studies has allowed a detailed assessment to be made, including the identification of potential constraints and opportunities which have informed the design proposals.

The key considerations are:

- The topographical slope across the site, which falls from 80m / 81m along the Southern boundary to 75m / 76m along Lower End Road;
- The size of the site which is 2.04 Hectares (5.04 Acres) with a max. dimension to the frontages of approx. 160.5m to Lower End Road and 179.5m to Cross End
- Location of existing site utilities including High-Pressure Gas Main that crosses the site from SW to NE corner and creating well considered connections generally, see previous detail;
- Pedestrian and cycle access to the site from the existing Redway which lies to the far side of Lower End Road screened behind a hedgerow;
- Location of safe vehicle access from Lower End Road with sufficient visibility splays. Limits on use of Cross End single track road;
- Existing site vegetation and mature trees which currently screen all site boundaries;
- Potential impact on existing site ecology and mitigation strategies to minimise development effect;
- Consideration of drainage strategy and utilising a Sustainable Urban Drainage system (SuDs) to take advantage of site topography;
- The visual impact of the site and views into and out of the development, which are limited by the existing vegetation;
- Impact on dwellings in Cross End, particularly those listed properties which back on to the South of the site. This boundary will be considered in a sensitive manner;
- This site will support the coherent and sustainable expansion aspirations of Milton Keynes and contribute positively to the expanding settlement of Cross End, building on the character and historic qualities of the Village and Cross End settlement and reinforcing and enhancing the existing green infrastructure as part of the site proposals;
- Enhancing public access from adjoining new housing developments and improving pedestrian routes to new schools and new / existing facilities;
- Creating new formal open space linked in to the wider green infrastructure network for use by new and existing residents;
- Building on the proximity and character of the area, through a landscape led approach to development and improvements to public access;
- Maximising the opportunity to promote sustainable transport options, through the proximity to proposed mass transport systems when they are delivered in the future;
- Preserving the character of the existing properties by retaining existing mature landscape boundary features within the masterplan framework;
- Retaining and enhancing existing areas of ecological value within the site by incorporating them into a wider green infrastructure strategy and supporting offsite initiatives for habitats under district licencing arrangements;
- Retaining important trees and hedgerows that help to create a mature landscape for the proposals and providing new areas of planting; and
- Preserving and strengthening areas of natural open space and creating new potential habitats for existing or visiting wildlife in the area.

# CONSTRAINTS AND OPPORTUNITIES

## KEY

-  Site Boundary
-  Major Road
-  Minor Road
-  Bus Stop
-  Redway, Pedestrian and Cycles
-  Existing Major Vegetation / Trees to be Retained and Reinforced
-  Fall in Topography. Lowest Point to Road
-  High Pressure Gas Main Easement
-  Glebe Farm Secondary School
-  Sensitive Edge Condition
-  Public Footpath
-  Potential Alignment of Footpath
-  Proposed Footpath Connection
-  Potential Alignment of Access Road
-  Proposed Vehicle Access Point
-  Proposed Extent of Green Infrastructure and Focal Point Open Space
-  Potential Location of Attenuation Basins (SUDs)
-  Proposed Key Frontage

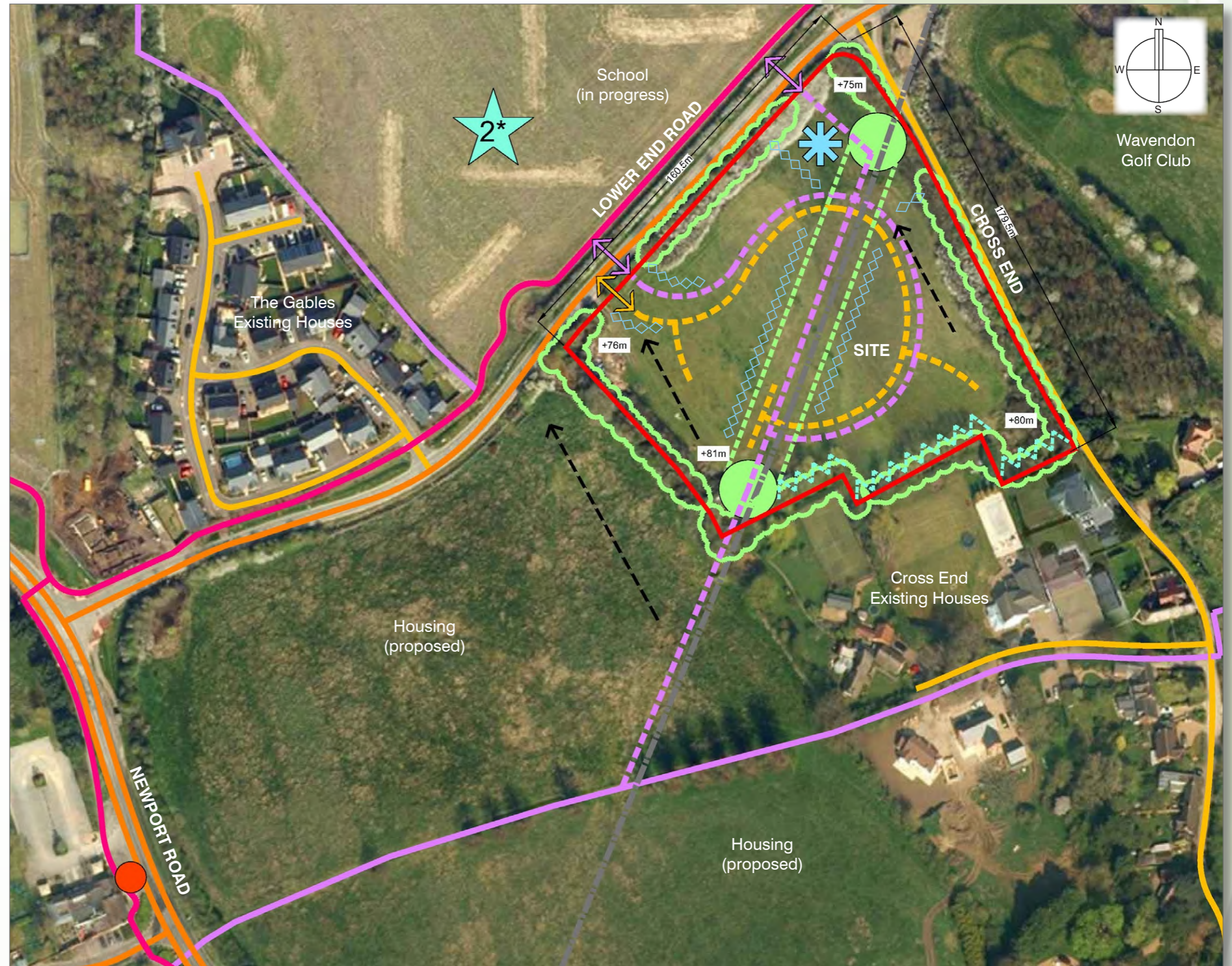


Fig no. 27, Aerial photograph with constraints and opportunities highlighted

# FRAMEWORK PLAN

The framework plan has been developed to provide a high-level approach to development. We have set out the design principles to inform the framework plan.

The masterplan has evolved around a simple framework of actions. The proposals aim to:

- Enhance the setting of existing landscape features within the site;
- Potentially provide a new permissive movement route to / from Glebe Farm and adjacent development on the west of the site;
- Utilise the existing landscape and provide a corridor through the development; and
- Provide a single point of access along Lower End Road, providing access across the site.

## CHARACTER

The character of development will be based on elements found in Wavendon Parish and beyond. Detailed designs will take cues from surrounding colours, materials or architectural features to be agreed with the planning authority.

## PUBLIC REALM AND OPEN SPACE

Green infrastructure is one of the key principles of the site proposals. This will include areas for sustainable drainage, areas for play and natural habitat enhancement and informal green verges within the core of the development to provide local open space for residents.

## MOVEMENT

A simple movement strategy is proposed with access from Lower End Road. An organic street form will provide access within the site, and footpaths and cycle ways around the site will be accessible to maximise the ability to travel on foot or by bicycle, alongside access to existing buses and future mass transport systems that are intended to be rolled out in this locality.

## SCALE AND MASSING

The scale and density of development will respond to the existing character studies. Densities and heights will respect the existing context of the site and the surrounding open space structure.



Fig no. 28, Illustrative framework plan

## VISION DOCUMENT

Land to South of Lower End Road, Wavendon

## CONCLUSION AND SUMMARY OF BENEFITS

The proposals set out in this document, provide a vision for new housing at this site. The site provides a logical and sustainable extension to Milton Keynes and supports a range of wider benefits around expanding green infrastructure and recreational amenity within the area.

The existing nearby settlement at Cross End has expanded far beyond its compact historic form in just the last few years, with multiple infills and developments extending the small group of dwellings in recent years. Construction is also still underway on significant new developments, including land West of Newport Rd / Wavendon Gate, Glebe Farm, Eagle Farm and other land South of A421. This is no doubt why the MK: Futures 2050 study has concluded this area is suitable for development and perhaps likely to be a strategically important expansion area for Milton Keynes.

The Environment Agency Flood Maps demonstrate that the whole of the site lies outside of the areas of flood risk. The site provides the opportunity to create a well-designed and safe environment, with easy access to key services and public transport links. The site is ideally placed to contribute to the supply of new homes needed in Milton Keynes

In summary, the development of the site would ensure:

- Delivery of around 60 new homes;
- Promotion of a site in a highly sustainable location with fully inclusive well-designed streets and public spaces;
- Opportunities to enhance the setting and the character of the locality by expanding its landscape structure through the proposed development, ensuring public access and ecological enhancement; and
- Connections to the wider local infrastructure, schools, nearby amenities and facilities promoting community as an integral part of the proposals.





---

**VISION DOCUMENT**

Land to South of Lower End Road, Wavendon

---



**Milton Keynes City Plan 2050**  
Proposed Submission Stage Representation Form

**Ref:**  
**(For official use only)**

**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

Mrs

First Name

Emily

Last Name

Warner

Job Title  
(where relevant)

Associate Director

Organisation  
(where relevant)

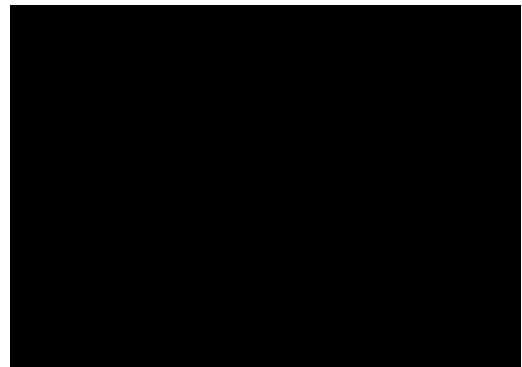
Abbeygate Developments Ltd

E-mail Address

Address Line 1

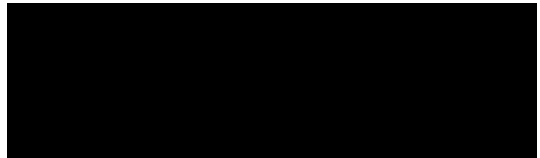
Line 2

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? – General comments**

Paragraph

Policy

GS2

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 refer to accompanying Statement for full details.

(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 refer to accompanying Statement for full details.

(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:

The matters under Examination directly affect my client's interests and the soundness of the Local Plan. Participation in the hearings will allow me to explain my representations in person, respond to questions from the Inspector and clarify technical or site-specific issues that cannot be fully addressed through written submissions alone. Engaging in the Examination process will assist the Inspector in understanding the practical implications of the Plan's policies and evidence base, help resolve any points of disagreement, and contribute to a robust and effective Examination of the Local Plan.

**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-notices/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.*

**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

Mrs

First Name

Emily

Last Name

Warner

Job Title  
(where relevant)

Associate Director

Organisation  
(where relevant)

Abbeygate Developments Ltd

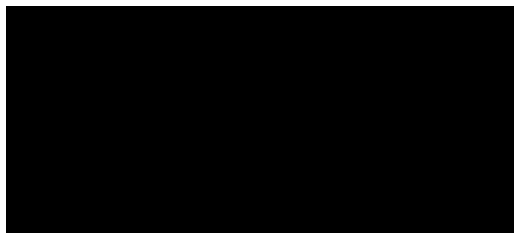
Smith Jenkins Planning & Heritage

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? – General comments**

Paragraph  Policy  Policies Map

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

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4.(3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

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 refer to accompanying Statement for full details.

(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 refer to accompanying Statement for full details.

(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:

The matters under Examination directly affect my client's interests and the soundness of the Local Plan. Participation in the hearings will allow me to explain my representations in person, respond to questions from the Inspector and clarify technical or site-specific issues that cannot be fully addressed through written submissions alone. Engaging in the Examination process will assist the Inspector in understanding the practical implications of the Plan's policies and evidence base, help resolve any points of disagreement, and contribute to a robust and effective Examination of the Local Plan.

**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.*

**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

Mrs

First Name

Emily

Last Name

Warner

Job Title  
(where relevant)

Associate Director

Organisation

Abbeygate Developments Ltd

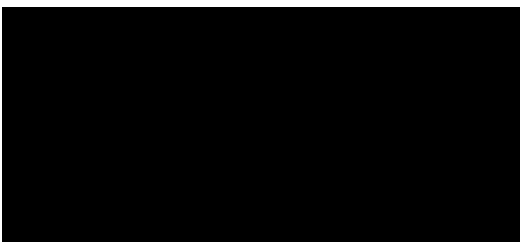
Smith Jenkins Planning & Heritage

(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? – General comments**

Paragraph  Policy  Policies Map

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

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4.(3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

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 refer to accompanying Statement for full details.

(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 refer to accompanying Statement for full details.

(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:

The matters under Examination directly affect my client's interests and the soundness of the Local Plan. Participation in the hearings will allow me to explain my representations in person, respond to questions from the Inspector and clarify technical or site-specific issues that cannot be fully addressed through written submissions alone. Engaging in the Examination process will assist the Inspector in understanding the practical implications of the Plan's policies and evidence base, help resolve any points of disagreement, and contribute to a robust and effective Examination of the Local Plan.

**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-notices/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.*