



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 22nd 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

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

David Wilson Homes

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

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.

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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:

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Paragraph Policy Policies Map

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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"/>

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

Land off Newport Road, Wavendon,
Milton Keynes

On behalf of Mr S Locker and Mr T Locker
(Landowners) and
David Wilson Homes (Developer)

December 2025

Ref: 913

Smith Jenkins Ltd



1 Introduction

- 1.1 These representations have been prepared by Smith Jenkins Planning & Heritage on behalf of landowners Mr S Locker and Mr T Locker and David Wilson Homes (DWH) 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, DWH promoted the allocation of Land off Newport Road, Wavendon for residential development of circa 150 – 200 dwellings including affordable housing and a significant area of open space comprising a linear park, landscaping and drainage attenuation, as shown indicatively in the Concept Diagram below in **Figure 1**. DWH also challenged the inclusion of the land in the designated Wavendon Strategic Buffer (Policy GS16).



Figure 1 – Concept Diagram - Land off Newport 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 also detailed how DWH have entered into collaborative discussions with the promoters of the adjacent parcel of land (Land off Lower End 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:

- DWH 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;
- The Plan should allocate smaller sized, deliverable sites in sustainable locations which can start contributing towards housing needs within a shorter time period to diversify supply and increase flexibility;

- Land off Newport 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 Newport 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 Newport Road, Wavendon can come forward with Land off Lower End 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**.

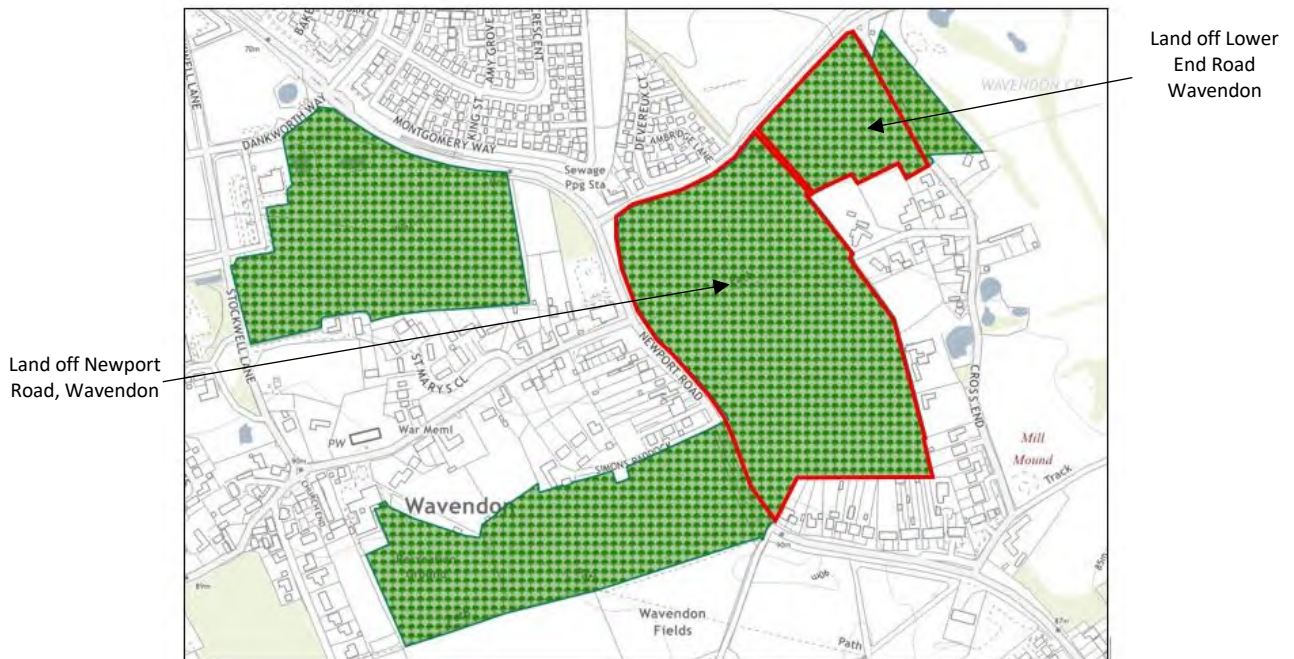


Figure 3 - Wavendon Strategic Buffer and promoted sites

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

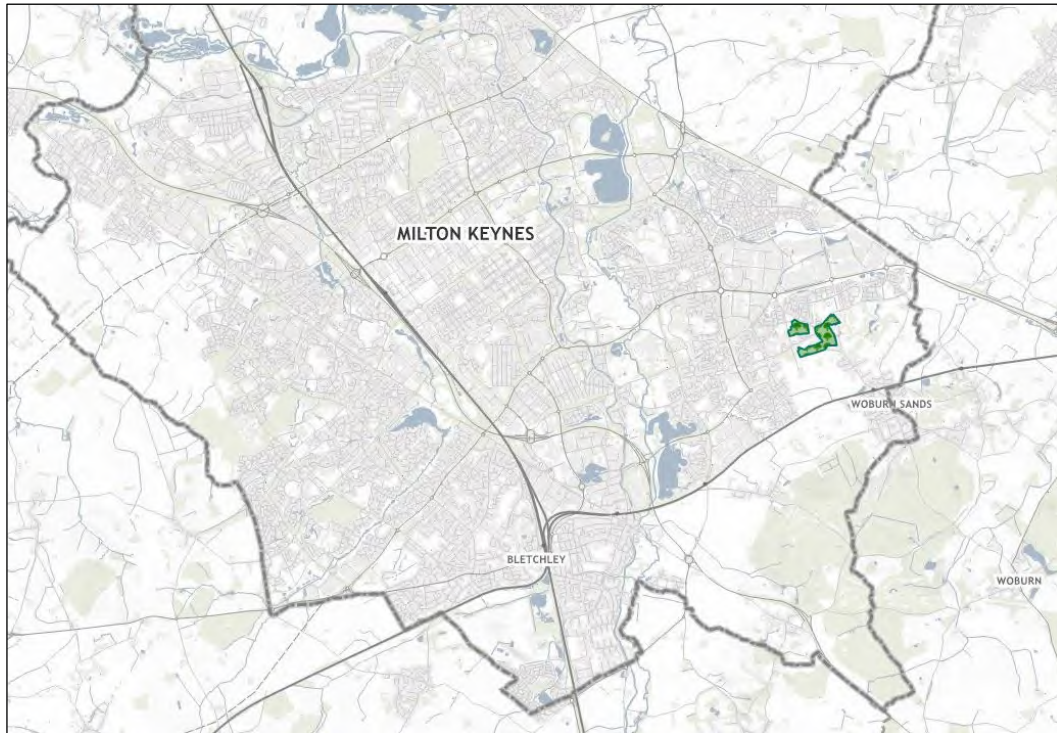


Figure 4 - Wavendon Strategic Buffer in the wider context

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. As drafted, the policy places a reliance on a number of strategic housing sites to meet housing needs and fails to adequately take into account unmet housing needs arising from neighbouring authorities. The following commentary sets out below why this approach is **unsound**.

a) The Plan is not Positively Prepared

2.2 Policy GS2 is not positively prepared because it assumes that MKCC's identified housing requirement can largely be met through a number of strategic allocations, and this approach risks leaving a substantial proportion of housing need unmet over the Plan period and does not reflect a strategy that seeks to maximise sustainable opportunities across the City.

2.3 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 more balanced supply is required, and this could be achieved in the short term by the inclusion of smaller, deliverable sites.

2.4 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.

2.5 Land off Newport Road, Wavendon provides an opportunity to allocate a smaller site to provide flexibility. 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.

2.6 In addition, the policy fails to demonstrate how unmet housing needs from neighbouring authorities have been taken into account. 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 is now subject to an approved Special Development Order (SDO). 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.

2.7 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.

- 2.8 Milton Keynes, with its ambitions for long-term growth, is an ideal location to accommodate unmet need from its neighbouring authorities. Despite the significant and material change in circumstances identified above, Policy GS2 does not demonstrate how MKCC has responded to, or allowed flexibility for, potential redistribution of housing requirements arising from neighbouring authorities.
- 2.9 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

- 2.10 Policy GS2 is not justified because it is not supported by robust evidence demonstrating that reliance on strategic sites represents the most appropriate strategy when considered against reasonable alternatives.
- 2.11 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.
- 2.12 Furthermore, the Plan does not provide a clear explanation of how housing needs arising from neighbouring authorities have been assessed or potentially accommodated. The absence of this evidence undermines the justification for the chosen strategy.

c) The Plan is not Effective

- 2.13 The policy 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

- 2.14 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).
- 2.15 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

- 2.16 Policy GS2 is unsound because it places reliance on large strategic housing sites and fails to adequately consider or respond to housing needs 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 to diversify supply and increase flexibility.

Policy GS15 East of Wavendon Strategic City Extension

Soundness

- 2.17 DWH 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 Newport 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

- 2.18 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 Newport Road results in a fragmented and sub-optimal allocation. Bringing the site forward sooner, including promoted land, would allow for more coordinated development, early delivery of housing, and effective integration with supporting infrastructure.

b) The Plan is not Justified

- 2.19 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.
- 2.20 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

- 2.21 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.
- 2.22 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

- 2.23 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

- 2.24 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

- 2.25 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.
- 2.26 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

- 2.27 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.
- 2.28 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 inefficient use of sustainable land.

b) The Plan is not Justified

- 2.29 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.
- 2.30 A high-level Landscape Visual Assessment has been undertaken by IDP for Land off Newport Road in conjunction with Land off Lower End 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.

- 2.31 Policy GS16 is therefore not justified because the designation of the Wavendon Strategic Buffer is entirely arbitrary and unsupported by any technical evidence. There is no 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

- 2.32 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.
- 2.33 The buffer designation also 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.
- 2.34 Allocating the land for housing would provide a more resilient and deliverable strategy. 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

- 2.35 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).
- 2.36 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 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.

- 2.37 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

- 2.38 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 landowners Mr S Locker and Mr T Locker and David Wilson Homes (DWH) 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.
- 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 Newport 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 representation 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 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

**Representations to the
MK City Plan 2050
Regulation 18 Draft**

Land off Newport Road, Wavendon,
Milton Keynes

On behalf of Mr S Locker and Mr T Locker
(Landowners) and
David Wilson Homes (Developer)

October 2024

Ref: 913

Smith Jenkins Ltd



1 Introduction

- 1.1 These representations have been prepared by Smith Jenkins Planning & Heritage in response to the current MK City Plan 2050 Regulation 18 Consultation.
- 1.2 The representations are made on behalf of landowners Mr S Locker and Mr T Locker and housing developers David Wilson Homes (DWH) who have a longstanding Option Agreement in respect of Land off Newport Road, Wavendon, Milton Keynes.
- 1.3 The representations should be considered alongside the Landscape and Visual Impact Assessment Note and accompanying plans prepared by IDP attached at **Appendix 1**.
- 1.4 In summary these representations set out that:
- DWH supports the Council’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 Newport 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
 - 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
- 1.5 We trust that these representations will be duly considered and would welcome the opportunity to discuss the site with officers further as the preparation of the new Local Plan continues.

2 Background

- 2.1 In March 2022, a submission was made to the Call for Sites Consultation (reference CFS405026647) in support of the allocation of Land off Newport Road, Wavendon for a residential development of circa 200 dwellings. Representations were also made in support of the site to the New City Plan Ambitions Consultation in March 2023.
- 2.2 The previous representations put forward that the site provides an important opportunity to develop a modest parcel of land for residential purposes in a highly sustainable location surrounded by and well connected to the existing and emerging built up area of Milton Keynes and within the context of wider strategic land allocations and future growth aspirations.
- 2.3 A Concept Diagram has previously been shared with the Council which demonstrates that the site has the ability to be developed in a manner which has regard to and responds positively to the area and site constraints and would bring with it a significant number of material benefits.
- 2.4 The previous representations demonstrated that the site represents an available, suitable, achievable and therefore entirely deliverable option for residential development with no physical, legal or environmental constraints which would prevent it being delivered early in the new City Local Plan period to make a notable contribution towards the need for market and affordable housing and the delivery of sustainable development.
- 2.5 In this regard, Land off Newport Road, Wavendon has now been assessed positively in the Strategic Housing Land Availability Assessment (SHLAA, July 2024) (reference 110523) prepared as part of the Regulation 18 Consultation as a suitable, available and achievable site for housing.
- 2.6 Notwithstanding the positive assessment in the SHLAA, the Regulation 18 draft Local Plan has excluded Land off Newport Road, Wavendon from allocation for residential development and has included it in the designated Wavendon Strategic Buffer (Policy GS16) within which new development will be resisted.
- 2.7 In April 2024, prior to the publication of the Regulation 18 draft, a meeting took place with Milton Keynes City Council (MKCC) policy officers where it was advised that a collaborative approach should be taken by landowners and developers wishing to bring forward land in this area for development, as opposed to small, piecemeal proposals. Accordingly, in preparing these representations, collaborative discussions have taken place with the promoters of an adjacent parcel of land (LAA reference 110543, Land south of Lower End Road, Wavendon) in terms of the potential of the sites to come forward together with a shared active travel link between them and evidence submitted in support of these representations.

3 The Emerging Planning Context

Overview

- 3.1 The Regulation 18 version of MKCC’s draft City Plan was published for consultation on 17th July 2024. On 30th July 2024 the Government published a Written Ministerial Statement (WMS) ‘Building the Homes We Need’ by Angela Rayner MP – Deputy Prime Minister and Secretary of State for Housing, Communities and Local Government setting out the objective of delivering more housing over the life of the current Parliament alongside a new draft National Planning Policy Framework (NPPF) for consultation until 24th September 2024.
- 3.2 As detailed below, following the publication of the draft NPPF and WMS, the planning policy context has dramatically changed. MKCC’s City Plan must be reviewed and prepared in light of the emerging NPPF and the WMS, which is a material consideration in planning decisions as confirmed by Case Law^[1] as it represents the strong prospect of a change in planning policy.

Housing Need and Delivery

- 3.3 There are important points raised in both the revised NPPF and WMS which demonstrate the Government’s intention to increase the emphasis on the benefits of housing delivery in plan and decision making. The WMS states:

“We are in the middle of the most acute housing crisis in living memory. Home ownership is out of reach for too many; the shortage of houses drives high rents; and too many are left without access to a safe and secure home. That is why today I have set out reforms to fix the foundations of our housing and planning system – taking the tough choices needed to improve affordability, turbocharge growth and build the 1.5 million homes we have committed to deliver over the next five years.”

- 3.4 The consultation website for the draft NPPF changes states:

“We are clear that local planning authorities should identify opportunities for maximising the efficient use of land, especially in areas well served by transport and other infrastructure. By restricting density, the existing policy is likely to have longer term negative impacts on achieving sustainable patterns of development and on meeting expectations on future housing supply. Alongside this reversal, we propose strengthening expectations that plans should promote an uplift in density in urban areas.”

- 3.5 To support the Government’s ambition to boost housing delivery to 1.5 million new homes over the next five years, provide more stable and predictable housing numbers and distribute homes across

^[1] (Cala Homes (South) Ltd, R (on the application of) v Secretary of State for Communities and Local Government & Anor [2011] EWCA Civ 639 (27 May 2011))

the country where they are most needed, one of the proposed changes is the introduction of a new mandatory Standard Method of calculating housing need. This will set a baseline at a percentage (0.8%) of existing housing stocks, apply stronger affordability multipliers to relieve price pressures and remove certain caps/additions.

- 3.6 Notably, the revised draft NPPF also restores at Paragraph 76 the requirements for LPAs to demonstrate a five year housing land supply even when the adopted Plan is less than five years old. This reflects the need for LPAs to adapt and respond to changes in delivery (or lack thereof) after the adoption of a Plan, to ensure that needs are continued to be met.

Cross-Boundary Working

- 3.7 The Government has also confirmed its intention to introduce a universal system of strategic planning across England in this Parliament *with the objective 'to promote a more strategic approach to planning, by strengthening cross-boundary collaboration, ahead of legislation to introduce mandatory mechanisms for strategic planning.'*
- 3.8 There are also new strategic powers proposed in the draft revised NPPF (Paragraph 24) which states that: *'Effective strategic planning across local planning authority boundaries will play a vital and increasing role in how sustainable growth is delivered and key spatial issues, including meeting housing needs, delivering strategic infrastructure, and building economic and climate resilience, are addressed.'*
- 3.9 Once matters requiring 'collaboration' have been identified, the proposed new Paragraph 27 sets out certain requirements for policy-making authorities to ensure their policies are consistent unless there is a clear justification to the contrary. The paragraph encourages strategic policy-making on matters such as delivery of major infrastructure, unmet development needs from neighbouring areas and any allocation or designation which cuts across the boundary of plan areas.

Summary

- 3.10 The above demonstrates the clear recognition from Central Government that increasing the supply of housing, including by increasing densities on sites, will be essential to addressing the housing crisis and the importance of strategic cross boundary working between local authorities. The core message throughout the WMS and NPPF revision is that the Government will take a more pro-development approach to ensure the delivery of housing and will be updating policy to achieve this aim.
- 3.11 These representations refer throughout to the implications of the above emerging changes on the draft MK City Plan 2050 in support of the allocation of Land off Newport Road, Wavendon, Milton Keynes.

4 The Promoted Site

Site Description

- 4.1 The extent of the promoted site at Land off Newport Road, Wavendon is shown edged red on the Site Location Plan in **Figure 1** below.

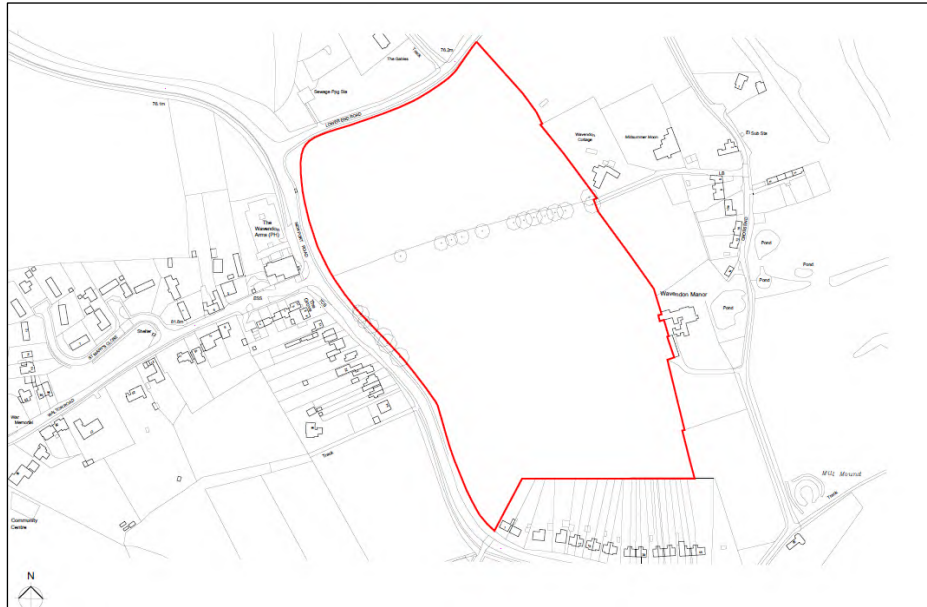


Figure 1 – Site Location Plan

- 4.2 The site is currently designated as Open Countryside in the adopted Plan:MK (2019). It is surrounded by built development to all sides with properties along the main A5130 Newport Road and the village of Wavendon to the west and dwellings within Cross End located to the east. The village of Wavendon contains a mix of housing styles including Georgian townhouses, post war housing and modern 20th Century housing. Cross End is a small hamlet incorporating a number of historic properties, small terraces and some more modern additions.
- 4.3 To the north lies Lower End Road with a parcel of residential development known as The Gables and the permitted Strategic Land Allocation of Glebe Farm beyond (allocated under Policy SD7 of Plan:MK) which is currently under construction. The site is bound to the south by a row of existing development along Newport Road which predominantly comprises two storey dwellings with some bungalows. There has also been a number of recent small scale residential developments approved in the vicinity of the site.
- 4.4 Land to the south west is allocated for a comprehensive residential-led mixed use development of approximately 3,000 dwellings under Policy SD11 South East Milton Keynes Strategic Urban Extension in Plan:MK.

- 4.5 The site is broadly rectangular in size and measures some 8.82 hectares. It rises slightly from the north to the south with a low point/depression in the north eastern corner and a linear depression in the southern part of the site. The site consists of an undeveloped field, laid to grass and used for grazing.
- 4.6 The site benefits from an existing farm access from Lower End Road. There is also the ability to provide a new access along Newport Road to appropriate standards to serve a residential development of the extent proposed.
- 4.7 A public footpath traverses the centre of the site from east to west. The existing public footpath is lined by mature trees. The majority of the site is bound by existing trees and hedgerows. There are no Tree Preservation Orders on the site.
- 4.8 The site is located entirely within Flood Zone 1 defined as areas in which flooding is very unlikely to occur (less than 0.1 % chance of flooding each year).
- 4.9 The site is not affected by any environmental, landscape or statutory or non-statutory ecological designations.
- 4.10 There are two Grade II listed buildings located immediately to the east of the site, Wavendon Manor and Wavendon Cottage. Further east within Cross End are the Grade II listed Cross End Cottage and Manor Cottage. The Grade II* Listed Church of St Mary is located approximately 400m to the west of the site. To the south east of the site is a Scheduled Ancient Monument known as Mill Mound. The site is not located within a Conservation Area.
- 4.11 There are overhead electric cables located along the northern part of the western site boundary and an overhead electric main on the eastern boundary. There is also an existing low pressure gas main with a 6m easement and an existing foul rising main and sewer which cross the site which can be incorporated into a development layout.
- 4.12 The site is within a sustainable and accessible location, adjoining established and committed residential development and within acceptable walking distance of a range of services and facilities within Wavendon, Wavendon Gate and Woburn Sands including shops, a public house, garden centres, a day nursery and primary schools. A number of local services and facilities, including a new all-through school on the permitted Strategic Land Allocation of nearby Glebe Farm which will be accessible to the site.

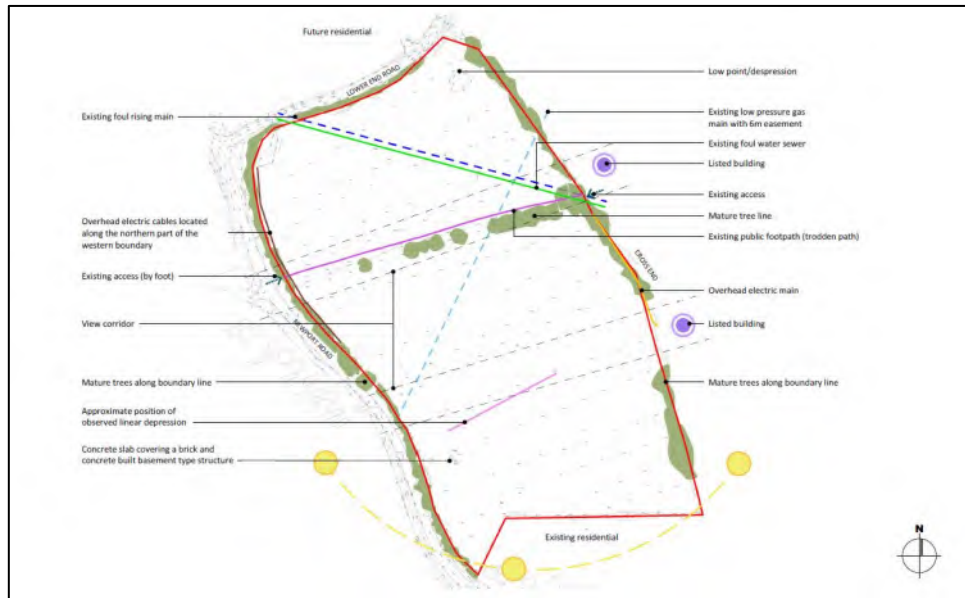


Figure 2 – Site Constraints Plan

Planning History

- 4.13 On 26th September 2018, an outline planning application on the site for a residential development for up to 180 dwellings and a community or commercial building with all matters reserved except access was refused (reference 17/00922/OUT). The indicative layout submitted with the application is below at **Figure 3**.



Figure 3 – Indicative site layout submitted with application 17/00922/OUT

- 4.14 The reasons for refusal were (1) the site was outside of the settlement boundary and therefore open countryside contrary to the countryside restraint policies in force at the time, (2) the development would have a significant urbanising effect which would harm the rural character and appearance of the area and would also harm the setting of nearby listed buildings, (3) there was an absence of necessary planning obligations towards existing local infrastructure and (4) there was a lack of information on protected species within and in the vicinity of the application area.
- 4.15 As detailed subsequently in these representations, none of these refusal reasons are considered insurmountable in the current context.

5 Representations

Overview

- 5.1 The MK City Plan 2050 Regulation 18 Plan sets out the ambitions, objectives and overall policy framework for delivering growth aligned with the Council’s vision contained within the Strategy for 2050.
- 5.2 The 28 year plan period (2022-2050) is ambitious and well exceeds the minimum 15 year requirement to anticipate and respond to long-term requirements and opportunities and is aligned with the 30 year requirement to allow for long term strategic planning as set in Paragraph 22 of the current National Planning Policy Framework (NPPF) which remains unchanged in the revised draft NPPF.
- 5.3 David Wilson Homes (DWH) welcomes the publication of the MK City Plan 2050 Regulation 18 Consultation and the opportunity to comment. DWH believe that a planned approach is essential for those choosing to invest in the area and to provide certainty for local communities.
- 5.4 Having reviewed the draft Plan however, there are several elements which DWH feel should be reconsidered. Given that this is a Regulation 18 draft, we are confident that they can be addressed, building on the work undertaken to date, to provide a positive plan for the area.
- 5.5 The responses are set out in relation to the various policies are set out under the various topic areas below.

Question 1(a) – our ambition and objectives for growth

Do you agree with our ambition and objectives for growth?

- 5.6 Partly agree.

Question 1(b) – our ambition and objectives for growth

Please say why you gave the answer to 1(a) above.

- 5.7 While DWH support the objective to provide high quality homes, the Plan needs to make provision for a choice and range of homes that meets the needs of the community as a whole. Sites need to be made available for a range of developers, not just through the provision of strategic sites. In order for the Plan to deliver the ambition, as detailed below, it 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.

Question 1(c) – our ambition and objectives for growth

Do you have any other comments or suggestions for this topic?

- 5.8 No.

Question 3(a) – Policy GS2 Strategy for homes

Do you agree with the draft policy?

5.9 No

Question 3(b) – Policy GS2 Strategy for homes

Please say why you gave the answer to 3(a) above.

- 5.10 The housing crisis is well documented. To support the Government’s objective of ‘significantly boosting’ the supply of homes, NPPF Paragraph 60 highlights the importance of a sufficient amount and variety of land coming forward where it is needed. As set out above, the new Government’s latest consultation proposes reforms to the NPPF and other aspects of the planning system to further boost housing supply.
- 5.11 Draft Local Plan Policy GS2 Strategy for Homes seeks to ensure the housing requirement is met by delivering between 53,245 and 63,000 new homes over the Plan period (2022 – 2050) or (1,902 – 2,250 homes per annum) through a range of urban and brownfield sites and new Strategic City Extensions.
- 5.12 The identified lower range will meet both the identified local housing need of 53,245 dwellings (1,902 per annum) using the Government’s Standard Method and the emerging figure of 1,759 per annum as set out in the revised Standard Methodology. It should be noted however that providing only the ‘minimum’ housing requirement of 53,245 dwellings over the Plan period will not deliver the Government’s clear objective of significantly boosting the supply of homes.
- 5.13 The distribution of the homes is set out in Table 1. The total housing supply as per Table 1 is 62,825. The identified supply of 62,825 provides a substantial 18% buffer over the Local Housing Need of 53,245. Whilst this approach of exceeding the identified need is commendable, the components of the supply have to be achievable. Indeed, 63,000 homes will only be delivered if every component of the supply is forthcoming over the Plan period.

Achievable Supply

- 5.14 The housing supply in Table 1 is considered vague and overly reliant on longer-term ‘broad locations’ for growth. For example, the assertion that 2,500 units will come from Transport Hubs is not evidenced in the Plan and no land is allocated. These units are currently based on an assumption (as stated in Paragraph 13 of the Plan). This cannot be a component of the housing supply if the figure is assumed and there are no allocations in the Plan.
- 5.15 Additionally, provision is made for 11,000 homes in Central Milton Keynes (CMK), however, this is based on broad assumptions and no specific sites are allocated. This figure is taken from a Land Availability Assessment (LAA) for CMK which is included in the Strategic Housing Land Availability Assessment (SHLAA). The LAA is a broadbrush assessment of capacity for residential development based on various assumptions. It is not based on a capacity resulting from available and developable sites submitted to the Council.

- 5.16 Notably, of 90 rural sites submitted, 31 were considered deliverable with a combined estimated capacity of 3,267 additional homes. The housing supply for the rural areas is based on submitted sites which have been assessed and considered to be 'deliverable'. The housing supply for CMK is based on assumptions of capacity, not deliverable sites.

Maintaining Supply

- 5.17 Local planning authorities are required to maintain a deliverable housing supply. As per Paragraph 69 of the NPPF, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Policies should identify a supply of (a) specific deliverable sites for five years from adoption, and (b), developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining Plan period. As defined in the NPPF Glossary, to be considered 'deliverable', sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years.
- 5.18 The Plan does not comply with the above requirements. It does not identify a short-term supply (five years from adoption). Most of the supply is from much longer-term strategic allocations and 'broad locations.'
- 5.19 Whilst 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 over the Plan period. A more balanced supply is required, and this could be achieved by the inclusion of deliverable sites in the short term.
- 5.20 This has been demonstrated by the existing allocations in Plan:MK, for example Land East of the M1 which is allocated for delivery of around 5,000 new homes and is expected to deliver 295 dwellings by 2026/2027 in the current Plan's trajectory. However, to date no reserved matters applications have come forward for residential development on the site and as such there is likely to be a delay in the expected delivery of homes against the trajectory. In addition, the Milton Keynes South East Strategic Urban Extension (Policy SD11) 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 is very likely to be a delay in the expected delivery of homes at this site against the trajectory.
- 5.21 Understanding the contribution of different sized sites is important. Land off Newport Road, Wavendon provides an opportunity to allocate a smaller site which will complement the existing and new strategic allocations and provide flexibility in the event that allocated sites do not deliver at the rates expected or do not come forward during the Plan period.

Meeting the Needs of Neighbouring Areas

- 5.22 NPPF Paragraph 11 requires that, as a minimum, strategic policies provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas unless:

- The application of policies protecting areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or
- Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework as a whole.

- 5.23 Similarly, NPPF Paragraph 61 requires that any needs that cannot be met within neighbouring areas should be taken into account in establishing the amount of housing to be planned for. As identified previously, in revising the NPPF, the Government will require all areas to take a “cross-boundary strategic planning approach” in a bid to boost delivery of new homes.
- 5.24 Delivering the lower-range target of 53,245 dwellings over the Plan period, as set out in draft Policy GS2, will not address needs that cannot be met within neighbouring areas, such as Buckinghamshire and Bedford Borough, which are discussed in more detail below.
- 5.25 Whilst it is acknowledged that there are circumstances under which the needs of neighbouring areas do not need to be provided for, it is not considered that any of these apply to the site the subject of this representation (or to Milton Keynes as a whole). It is not within a protected area (and it does not comprise an asset of particular importance) and no adverse impacts (that would significantly and demonstrably outweigh the benefits) are anticipated.
- 5.26 In terms of Bedford Borough, although the examination of the Local Plan has been paused, the draft Policies Map allocates the land upon which Universal Studios is understood to be seeking to deliver a theme park for at least 4,000 homes (Policy HOU14 Kempston Hardwick New Settlement). If a proposal for a theme park is approved, it will be necessary for Bedford Borough to provide this housing to meet its needs elsewhere within its administrative area or if this is not possible, it will be required to look to neighbouring authorities to help meet this need. Milton Keynes, with its ambitions for long-term growth, is an ideal location to accommodate unmet need from Bedford Borough.
- 5.27 In terms of the other neighbouring authority, Buckinghamshire, it is noted that the revisions to the Standard Method would significantly increase Buckinghamshire’s housing need figure from 2,912 homes per year to 4,122 homes per year (an increase of 41.6%). Paragraph 2.11 of the NPPF Update report to Buckinghamshire Council’s Growth, Infrastructure and Housing Select Committee on 26th September 2024 confirms that over the time horizon of the Buckinghamshire Local Plan (2024-2045), this produces a total housing need of 86,562 dwellings. Taking into account the 25,650 homes which are already in the pipeline as a result of unimplemented planning permissions and existing local and neighbourhood plan site allocations, 60,912 homes will still need to be allocated through the new Buckinghamshire Local Plan.
- 5.28 Although Buckinghamshire Council’s most recently published Annual Monitoring Report shows that in the annual monitoring year 2022 – 2023, 3,751 dwellings were delivered, the table published alongside the Government’s consultation on revisions to the Standard Method shows that the average annual net additions in Buckinghamshire between 2020/21 and 2022/23 comprised only 2,789 dwellings. Clearly it will not be possible to deliver the 4,122 homes per year that the Government’s revised Standard Method, if adopted, will require.

- 5.29 As previously mentioned, Milton Keynes, with its ambitions for long-term growth, is an ideal location to accommodate unmet need from Buckinghamshire. Delivering the ‘minimum’ housing requirement over the Plan period, 53,245 dwellings, will not address needs that cannot be met within neighbouring areas.
- 5.30 There is no evidence to confirm that the needs of neighbouring authorities have been considered in the preparation of the Plan. It is considered that the ‘minimum’ housing requirement must be reviewed to take into account the unmet need of neighbouring areas and that the New City Plan should seek to allocate additional smaller housing sites which can assist in meeting these needs.

Question 3(c) – Policy GS2 Strategy for homes

Do you have any other comments or suggestions for this topic?

- 5.31 In summary, the Plan will need to maintain a deliverable supply of housing over the Plan period. At this stage, the Plan does not demonstrate that the housing supply is achievable and does not include allowance for meeting the needs of neighbouring authorities. A very large component of the existing supply is based on broad assumptions and strategic sites, both of which will be delivered in the longer-term. It appears that there is an over-reliance on the delivery of sites which are expected to come forward, rather than those which are deliverable now.
- 5.32 For this reason, DWH maintains that 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.

Question 12(a) – Policy GS11 Principles for extensions to the city

Do you agree with the draft policy?

- 5.33 Yes

Question 12(b) – Policy GS11 Principles for extensions to the city

Please say why you gave the answer to 12 (a) above.

- 5.34 In light of the comments above on cross boundary working, draft Policy GS15, which sets out a series of cross-boundary principles for when, and if, development comes forward for an area on the edge of Milton Keynes is a sensible approach and is supported by DWH. However given the importance of this, it is clear that this policy should be a priority and be considered sooner in the Plan making process.

Question 12(c) – Policy GS11 Principles for extensions to the city

Do you have any other comments or suggestions for this topic?

- 5.35 No

Question 16(a) – Policy GS15 East of Wavendon Strategic City Extension

Do you agree with the draft policy?

- 5.36 DWH agree with the principle of Policy GS15 East of Wavendon Strategic City Extension but as detailed below, would like to comment on the timing and capacity of the proposed allocation.

Question 16(b) – Policy GS15 East of Wavendon Strategic City Extension

Please say why you gave the answer to 16(a) above

- 5.37 Draft Policy GS2 Strategy for Homes allocates 3,000 new homes in the East of Wavendon Strategic City Extension and sets out a series of criteria that development proposals in the East of Wavendon Strategic City Extension must meet.
- 5.38 The land allocated in the Wavendon Strategic City Extension does not appear to be of a sufficient size to accommodate 3,000 dwellings alongside the other policy requirements including a 12 hectare District Park, a range of other community amenities, including open and play spaces, convenience and service retail units, and active travel and public transport stops and hubs as well as open space.
- 5.39 There are in addition other constraints which could impact upon the final level of residential development which could be delivered on the allocation such as the requirement for an offset from the Grade II* Wavendon House and its registered park and gardens. 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.
- 5.40 In addition, a strategic site of this size will take time to mobilise and deliver compared to small sites which can be delivered quickly in the Plan period.
- 5.41 Policy GS15 states that commencement of residential development within the East of Wavendon Strategic City Extension will not be permitted to occur prior to 2038 once the currently planned growth to the south and south-east of the city is substantially completed and their full effects on infrastructure to be demonstrable and factored into the planning of the site. This restriction will unnecessarily preclude earlier delivery if the relevant infrastructure is in place earlier and should be amended to provide flexibility. There is considered to be no justification to delay development until 2038.
- 5.42 In light of the above, it is deemed that further land for housing will be needed to deliver the growth envisaged for this area. Allocating the site at Newport Road, Wavendon, which can be delivered quickly, would help achieve a figure close to or exceeding the 3,000 dwellings envisaged for this area.

Question 16(c) – Policy GS15 East of Wavendon Strategic City Extension

Do you have any other comments or suggestions for this topic?

- 5.43 No

Question 17(a) – Policy GS16 Wavendon Strategic Buffers

Do you agree with the draft policy?

5.44 No.

Question 17(b) – Policy GS16 Wavendon Strategic Buffers

Please say why you gave the answer to 17(a) above.

- 5.45 Draft Policy GS16 identifies two tranches of land within which development 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.’
- 5.46 Land at off Newport Road, Wavendon and the adjacent parcel (SHLAA reference 110543) has been included within this buffer as shown on **Figure 4** below.

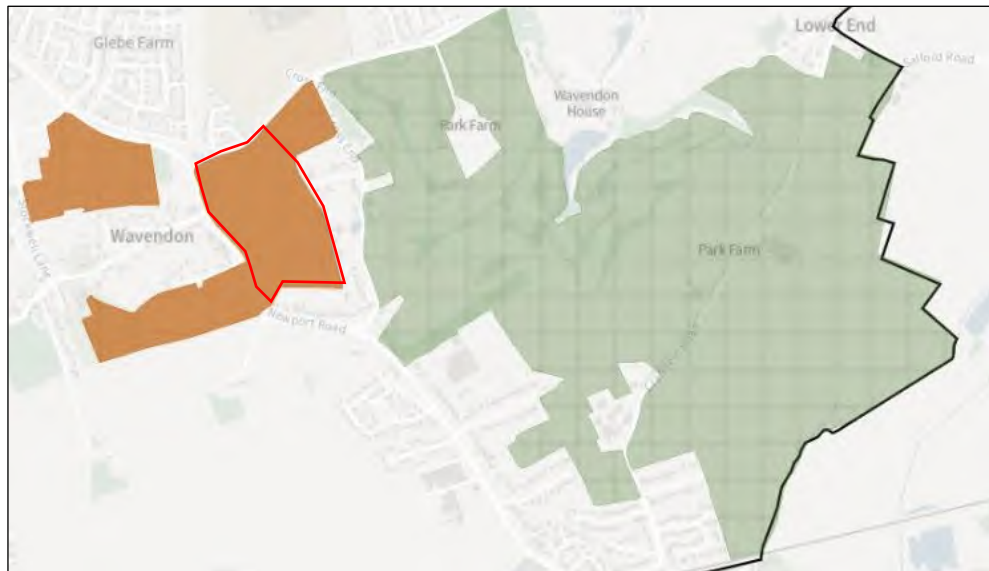


Figure 4 – Extract from MK City Plan draft Policies Map with promoted site outlined in red and Wavendon Landscape Buffer in brown

- 5.47 Paragraph 31 of the NPPF states that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. Paragraph 35 states in the examination of a Local Plan, one test of soundness is that the Plan is ‘Justified’ based on an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.
- 5.48 In this regard the draft Plan is not accompanied by any Evidence Base document which assesses the landscape quality and function of the land or the requirement for a landscape buffer to be designated in this location. There is absolutely no justification for the policy beyond what is said in the text regarding maintaining the existing open character between Wavendon and surrounding built

development and retaining Wavendon's character as a distinct and historic settlement within the wider built-up area of Milton Keynes city.

- 5.49 It is entirely unclear whether this policy would have been proposed if Policy GS15 were not being proposed. It is also unclear as to why the landscape buffers are being proposed as two separate policies if the buffer is only required by the allocation. It is also unclear why the landscape buffer is the only one of its kind proposed in the Plan.
- 5.50 The proposed buffer is entirely arbitrary and not in keeping with how existing settlements have been treated in the City over the past 50 years through comprehensive spatial planning with open space rather than ad hoc landscape buffers which serve no purpose. The designation of the land as a Landscape Buffer represents a totally efficient use of sustainable land.
- 5.51 As part of these representations, a Landscape Visual Assessment has been undertaken by IDP which provides a high-level appraisal of the site and adjacent parcel (LAA reference 110543, Land south of Lower End Road, Wavendon), through an assessment of the landscape and visual characteristics of the area.
- 5.52 The Note details that the sites lies in a juxtaposition of old and new development in the wider setting of the city of Milton Keynes. Taking into account the site and setting in the wider context of the urban expansion, there is a strong sense of identity within each of the different character areas which remain distinct despite the evolving urban landscape that surrounds them. The Note concludes that the site and adjacent parcel provides a development opportunity for 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 important attributes of the nearby heritage assets.

Question 17(c) – Policy GS16 Wavendon Strategic Buffers

Do you have any other comments or suggestions for this topic?

- 5.53 On the above basis, it is considered that Policy GS16 Wavendon Strategic Buffers should be omitted from the Plan as it is not justified and would not serve any purpose and that the land incorporated, including Land off Newport Road, should be allocated for residential development to ensure the area can be comprehensively developed.

Allocation of Land off Newport Road, Wavendon

- 5.54 The site is promoted for a residential development of circa 150 – 200 dwellings including affordable housing and a significant area of open space comprising a linear park, landscaping and drainage attenuation. A Concept Diagram as shown below in **Figure 5** has been prepared which shows indicatively:
- Six housing development parcels;
 - A main vehicular access off Newport Road;
 - A series of internal primary and secondary roads;

- The retention and enhancement of the existing public right of way;
- Footpath and cycleway connections onto Newport Road via the proposed main access point and the retained public right of way to link with proposed routes within the adjacent Glebe Farm development;
- The retention and enhancement of existing boundary planting;
- A substantial linear park along eastern boundary and site wide areas of open space;
- An attenuation feature to north eastern site corner;
- The retention of existing gas and foul rising mains with easements; and
- The retention of key views towards listed buildings to the east



Figure 5 – Concept Diagram

- 5.55 It is anticipated that development on the site could be delivered predominantly in the form of detached houses with some semi-detached and small terraces, generally two storeys in height but with a series of 2.5 storey dwellings at gateway/corner locations to aid legibility and add interest.
- 5.56 The Concept Diagram demonstrates that development on the site can be delivered in a manner that respects the surrounding developments, both existing and committed and will respond appropriately to a number of the onsite constraints including the underground utilities, existing vegetation and the existing public footpath.
- 5.57 Allocation of the site would deliver several social, economic and environmental benefits, therefore furthering the three key dimensions of planning in achieving sustainable development as defined in the National Planning Policy Framework (2023) as detailed below.

Social Benefits

- Supporting the creation of a strong, sustainable, vibrant and healthy community by increasing the supply of housing of a type and tenure to meet the needs of the area including family homes and affordable housing (meeting Objectives 1, 4 and 9 of the draft New City Local Plan);
- Providing high quality energy efficient homes (meeting Objective 4 of the draft New City Local Plan);
- The footpath and cycleway connections will provide opportunities of exercise and sustainable access between Cross End, Woburn Sands and the Glebe Farm development (meeting Objectives 2 and 3 of the draft New City Local Plan); and
- Provision of public open space and a substantial linear park to the east to provide attractive and accessible local greenspace for the development and wider community (meeting Objectives 1, 2 of the draft New City Local Plan)

Economic Benefits

- Assisting in building a strong, responsive and competitive economy by providing a suitable site in an appropriate location to support housing growth (meeting Objective 11 of the draft New City Local Plan);
- The additional residents generated by a development on the site will result in increased demand for local goods and services which will enable sustained use of local shops and services, increasing their viability and bringing a boost to the local economy; and
- Potential to deliver new job opportunities during the construction phase.

Environmental Benefits

- Retention and enhancement of existing hedges and trees and provision of additional open space to provide ecological enhancements and significant gains in biodiversity (meeting Objectives 7 and 8 of draft New City Local Plan)

Deliverability of the Site

5.58 Paragraph 69 of the NPPF requires local planning authorities to have a clear understanding of the land available in their area to identify a sufficient supply and mix of housing sites. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Paragraph 70 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.

5.59 To be considered deliverable, sites should be available now, offer a suitable location for development, and be achievable with a realistic prospect that housing will be delivered on the site within five years, as defined in the NPPF Glossary.

- 5.60 The following demonstrates that Land off Newport Road, Wavendon represents an available, suitable, achievable and therefore entirely deliverable option for residential development which can be delivered in the new Local Plan period to make a notable contribution towards the need for market and affordable housing and the delivery of sustainable development.

Available

- 5.61 The site is available immediately and due to its location on the edge of existing residential development (in the Strategic Land Allocation to the north) could benefit from existing infrastructure and thus be delivered early on in the Plan period.
- 5.62 The landowners, Mr. Stephen Locker and Mr. Timothy Locker are fully supportive of this submission and the development of the site in the short term and within the early plan period.
- 5.63 There are no known legal or ownership issues or covenants and no technical constraints which would prevent the site from being developed for housing upon receipt of requisite consents and no reasons which would cause delays or render the site unavailable.

Suitable

- 5.64 As detailed previously, the suitability of the site for residential development has been considered previously under application reference 17/00922/OUT. This application was submitted at a time when Milton Keynes Council could not demonstrate a 5 year housing land supply. In this regard, whilst the provision of housing weighed favourably in the planning balance, officers considered that the then emerging Plan:MK was at an advanced stage to hold weight in the decision making process, and that the granting of development in this location would be considered premature such that it would undermine the plan making process. This was by reason that the proposal would link the settlements of Wavendon, Woburn Sands and Cross End and effectively compromise their settlement boundaries and the separation created through the site's designation as Open Countryside which was considered to constitute a significant shift in strategic land allocation outside of the plan-making process, to the detriment of the strategic policies in the emerging Plan:MK.
- 5.65 In this respect, the planning context within which the site is located has now altered through the subsequent adoption of Plan:MK and the partial and forthcoming delivery of the nearby strategic sites. The site now sits within a significant area of growth where development will extend along both sides of Newport Road, linking the existing eastern edge of Milton Keynes with the northern edge of Wavendon with development also extending along the northern boundary of the site along Lower End Road. Several small scale housing development have also been delivered in the vicinity of the site such that it is now almost completely encircled by residential uses. The site therefore must now be considered in the context of development that is and will be provided in the near future and not be seen as an isolated site.
- 5.66 The site is very well connected to the existing built up area both in terms of its relationship with adjoining land uses and with regards to accessibility to services, facilities, and public transport links. It is bordered on all sides by existing built form and hedgerows which provide natural screening to the site such that development upon it will have little visible effect. Development on the site would

relate well to the immediate vicinity and the degree of containment would be retained after development with boundary planting being retained and reinforced and additional planting created where necessary. Open space areas can be incorporated to each site boundary, with a substantial linear park to the east to ensure separation remains between existing and proposed built form.

- 5.67 The site is not subject to any specific landscape designation, and no landscape harm would arise as a result of the allocation.
- 5.68 The site has no on-site heritage assets but is immediately adjacent to two Listed Buildings, Wavendon Manor and Wavendon Cottage located to the east. The refusal of the previous planning application considered that development on the site would harm the setting of these listed buildings as well as the Grade II* Listed Church of St Mary to the west by virtue of the urbanising effect of built form, the proposed position of development within the site, the loss and impact on the rural character of the field, and the proximity to the listed buildings.
- 5.69 In respect of the adjacent listed buildings to the east, their significance is considered to be attributed to the architectural, aesthetic and historic values of the buildings themselves with the immediate settings confined to the enclosed grounds provided by surrounding high and dense boundaries which serve to separate the heritage assets from the site. There is very little opportunity for intervisibility to the heritage assets from within the site and this is limited to more distant views from Newport Road. As such, the site is considered to have a neutral contribution to the overall significance of the heritage assets.
- 5.70 Whilst development on the site would change the wider experience of the assets from the current semi-rural to a more semi-urban one, this will affect the extended setting only, which has a neutral contribution, whereas the immediate setting within the enclosed grounds, which are of more importance in the contribution of significance, would remain intact. Nevertheless, the accompanying Concept Diagram shows a significant open space to the eastern boundary to maintain the open aspect of the surroundings, along with the retention of longer range views towards the listed buildings from Newport Road to reduce any harm.
- 5.71 In respect of the Grade II* listed St Mary's Church, much of this asset is screened from the site by vegetation, buildings and topography with only the upper portion of the tower providing a local landmark. The significance of the Church is considered to primarily be derived from its architectural, aesthetic, historic and communal significance which would remain intact as a result of development on the site. The site is however considered to be within the extended setting of the heritage asset due to the tower forming a local landmark with views of it possible from along the public footpath which traverses the site and forms a historic link between the village of Wavendon and Cross End hamlet. In response, development will be set back from the north and south of the public footpath to maintain a line of vision and historic connection between the two settlements.

Achievable

- 5.72 The landowner has a longstanding Option Agreement with DWH, who are actively developing sites elsewhere in the area and are fully committed to delivering the site in a prompt and timely manner to make a valuable contribution to housing land supply in the early part of the Plan period. DWH are

proud of their delivery record and the high quality housing product they provide. The size of the site is such that it has the ability to start contributing towards housing supply within a shorter time period when compared to larger strategic sites.

- 5.73 An evaluation of the technical and environmental constraints that could prevent or restrict the development of the land has been undertaken. This work has identified that there are no overriding constraints that will impede the achievability of development on the site. As part of the previous planning application, a full evaluation of the technical and environmental constraints that could prevent or restrict the development of the land has been undertaken. This work has identified that there are no overriding constraints that will impede the achievability of development on the site.

Viable

- 5.74 A scheme of the nature proposed is considered to be viable taking into consideration likely Section 106 payments, policy requirements and infrastructure costs. There are not expected to be any abnormal site costs associated with a development on the site.

Response to Strategic Housing Land Availability Assessment (SHLAA)

- 5.75 The site has been assessed in the Strategic Housing Land Availability Assessment (SHLAA) (July 2024) under reference 110534 as suitable, available and achievable site for housing. It concludes that development of the site should not just be considered in isolation, but as part of considering growth within the wider area.
- 5.76 A response to the SHLAA ‘Constraints Summary’ commentary in relation to the site is provided below:

Comments	Response
Development of the site would result in the settlement boundary of Wavendon extending across the Newport Road and effectively creating coalescence with Cross End and the recent developments at Glebe Farm and Eagle Farm.	The site sits within a significant area of growth where development will extend along both sides of Newport Road. The site therefore must now be considered in the context of development that is and will be provided in the near future and not be seen as an isolated site. Open space and landscape can be provided along the Newport Road site frontage to provide some offset from build development.
The site could form part of a wider strategic scale allocation but it does not share any boundaries with other sites that have been submitted for this purpose, so this would probably not be suitable.	The site can come forward for allocation with the adjoining parcel of land or in isolation. The site is available immediately and can come forward ahead of a larger strategic site.
There is a high pressure gas line running through the centre of the site which will require a buffer and would impact layout of any	These constraints have been considered in the Concept Plan and be further detailed in a planning application.

development and there are a number of listed buildings at Cross End which any development would need to consider the impacts on their setting.	
Access to the site cannot be taken off of Lower End Road and development should not prejudice connections east onward through the golf course site.	Access can be achieved from Newport Road to appropriate standards. Development on the site would not prejudice connections east onward

Collaborative Working

- 5.77 In discussions with officers, and in the assessment of the site in the SHLAA, it has been suggested that the site would benefit from consideration as part of a wider development.
- 5.78 In this respect, DWH have entered into collaborative discussions with the promoters of the adjacent parcel of land (LAA reference 110543, Land south of Lower End Road, Wavendon) in terms of the potential of the sites to come forward together with a shared active travel link between them. The promoters of both sites have a good working relationship and have communicated for a number of years.
- 5.79 The Development Opportunities Plan below at **Figure 6** prepared by IDP demonstrates how the two sites could appropriately come forward together to provide a development opportunity for new housing which extends the existing development parcels whilst maintaining the setting of both Wavendon village and the historic Cross End cluster around The Manor. The character of Newport Road to the western boundary would be retained with a substantial landscape buffer to maintain the separation to Wavendon. The PRoW through the site forms a natural break between parcels and retains the visual link east-west through the site. Development to the south would form a natural extension to existing housing with an access directly off Newport Road. This provides the opportunity for a vista to open up to Wavendon Manor terminating at a new public space that creates a development offset to the historic asset.
- 5.80 It is clear that there is considerably more scope for a sensitive residential development of the sites to meet many more of the objectives of the Local Plan as opposed to the current proposals for an arbitrary buffer, which is not supported by the submitted landscaping evidence as part of this consultation.



Figure 6 – Development Opportunities Plan

6 Conclusion

- 6.1 These representations have been prepared by Smith Jenkins Planning & Heritage to the current MK City Plan 2050 Regulation 18 Plan on behalf of landowners Mr S Locker and Mr T Locker and David Wilson Homes (DWH) who have a longstanding Option Agreement in respect of Land off Newport Road, Wavendon, Milton Keynes.
- 6.2 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, and in the context of the emerging national planning policy changes which seek to boost housing delivery further, the Council should seek to deliver the upper range of the housing target over the Plan period. There should also be less reliance on strategic sites to deliver housing growth given there is no guarantee that these will be delivered within the Plan period.
- 6.3 Given an increasing need for housing (both in Milton Keynes and its neighbouring areas), as well as the challenges of providing 3,000 dwellings in the proposed East of Wavendon Strategic City Extension and historic past delivery of strategic allocations, Land off Newport Road, Wavendon (and the adjoining parcel) should be allocated for residential development in the New City 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.
- 6.4 Land off Newport Road, Wavendon site 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 New City Local Plan period.
- 6.5 The representation 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 purpose.
- 6.6 We trust that these comments will be duly considered as the preparation of the Plan progresses.

APPENDIX 1



PROJECT NOTE – NEWPORT ROAD, WAVENDON

1.0 INTRODUCTION

- 1.1. IDP Landscape Ltd are appointed by the clients (David Wilson Homes and Abbeygate Developments) to provide professional advice on landscape and visual matters regarding the promotion of land for proposed residential development off Newport Road, Wavendon. The site is located between a cluster of housing known as Cross End to the east and Wavendon to the west which are connected via a public footpath through the site. To the north the urban extent of Milton Keynes extends to Newport Road and Lower End Road with a significant amount of housing having been developed recently with the 'Eastern Expansion Area'. Glebe School lies within this urban area with the playing fields located immediately to the north of the site (refer to SK00 Wider Context Plan).
- 1.2. The purpose of this commission is to carry out a high-level appraisal of the site and study area, through an assessment of the landscape and visual characteristics of the area and to inform the opportunities and constraints that will form part of the background information for the promotion of this site. This LVIA note has been carried out by Kevin Charsley, managing director of IDP Landscape Ltd, a chartered landscape professional with experience of providing impartial judgements as part of LVIA and Appeals.
- 1.3. A site visit has been carried out following instruction and informed by a desktop study to establish the wider implications of developing the land within the control of the client.

2.0 SITE DESCRIPTION

- 2.1. The site lies immediately to the east of Wavendon on land currently open and defined by Newport Road to the west, Lower End Road to the north, Cross End to the east and a line of houses fronting Newport Road to the south. The site consists of two fields surrounded by mature hedgerows and trees with a line of mature Lime trees through the centre along

the route of an existing Public Right of Way (PRoW). This is likely to have been the main route between Wavendon and Cross End historically, with the PRoW continuing east to Wavendon House. Cross End is a collection of historic buildings infilled with new housing creating a cluster of development which extends along the lane to join the housing to the south (refer to SK02 Site Analysis). This essentially land-locks the site with development other than the single broadly square field to the northeast corner.

- 2.2. A large strategic urban extension is planned to the east of Wavendon as indicated on SK00 as well as a new transport route (MRT – Mass Rapid Transit) through Wavendon and to link on to Newport Road with a new roundabout. To the south is the South East Milton Keynes urban extension which will provide 3000 homes encompassed by Tilbrook, Browns Wood and Wavendon to the north, Woburn Sands to the east, and the Greensands Ridge to the south.

3.0 LANDSCAPE & VISUAL ANALYSIS

- 3.1. The site lies in a juxtaposition of old and new development in the wider setting of the city of Milton Keynes. The historic assets of the centre of Wavendon and Cross End have been encompassed by more modern buildings creating zones of development that populate the landscape and form a mosaic of urban areas and landscape structure. This is evident as you pass along some of the local roads through contemporary new developments and then along historic high streets, as well as large, detached houses in extensive grounds with rural type views. It is an evolving landscape which influences the key characteristics of the area and creates different character areas within relatively small areas.
- 3.2. The landscape structure around the site is strong, with mature hedgerows along all boundaries which largely screening the site from surrounding views. On entering the site, it contains areas of rough grassland and open views across to the boundaries, with a prominent row of mature trees through the site. The field to the northeast is completely enclosed by vegetation and is grazed grassland. Milton Keynes eastern expansion area lies

to the north and is visually prominent along local roads and has completely changed the character of the area, as will the Strategic City Extension to the east and the South East expansion. Newport Road is flanked by housing to the west at Wavendon and then to the north at Cross End, and views into the site are curtailed by trees and hedgerow which acts as a visual barrier (refer to SK03 Visual Analysis).

- 3.3. Wavendon Manor lies to the east of the site and is an extended Grade II Listed 16th Century house with a pond and mature grounds. Although the Manor is not visible from the wider area, it is located on the boundary with the site with views into the open field.
- 3.4. Taking into account the site and setting in the wider context of the urban expansion, there is a strong sense of identity within each of the different character areas which remain distinct despite the evolving urban landscape that surrounds them. Wavendon lies immediately adjacent to the recently constructed eastern expansion and Cross End will see a similar urban extension to its east. The site whilst it remains open does not have a strong relationship with the adjacent development other than the public footpath and the tree-lined connection. The remainder of the site is unremarkable and well enclosed by the boundary vegetation.
- 3.5. It is noted that the Council in their first Draft Milton Keynes City Plan 2050 have allocated the site as part of a strategic buffer (Policy GS16 Wavendon Strategic Buffer). This is exclusive to Wavendon and is stated 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”*. It doesn’t appear that any further evidence or justification has been published to support this designation. This will be analysed below.

4.0 RECOMMENDATIONS

- 4.1. The site provides a development opportunity for new housing which would extend the

existing development parcels whilst maintaining the setting of both Wavendon village and the historic Cross End cluster around the Manor. The northern part of the Site up to the existing PRoW could be developed to mirror the housing to the north of Lower End Road, accessed directly and separately to provide two new parcels closely related to Glebe Farm and the character of Lower End Road.

- 4.2. The PRoW through the site forms a natural break between parcels to form a wide landscape buffer and retains the visual link east-west through the site. Development to the south would form a natural extension to existing housing with an access directly off Newport Road. The character of Newport Road to the western boundary would be retained with a substantial landscape buffer to maintain the separation to Wavendon. This buffer would provide the opportunity to link the existing green infrastructure in Glebe Farm to extend along the western boundary of the site and link to the existing PRoW network to the south of Newport Road. Although the blanket buffer imposed by the draft City Plan seeks to neutralise the whole site, there is sufficient space to provide an appropriate offset to development whilst providing the additional housing provision.
- 4.3. The new access to parcel 3 will provide the opportunity for a vista to open up to Wavendon Manor terminating at a new public space that creates a development offset to the historic asset. The gas main easement has been allowed for through the site beneath new streets, and proposed sustainable drainage systems (SuDS) can be accommodated on site for each parcel independently.
- 4.4. As illustrated on plan SK04 Development Opportunities, there is the potential for the site to be developed in such a way that retains the existing landscape structure, the character and setting of each existing development cluster, and the important attributes of the heritage assets.

KEVIN CHARLSLEY
BA (Hons) Dip LA CMLI

APPENDICES

SK00: Wider Context Plan

SK01: Site Location Plan

SK02: Site Analysis

SK03: Visual Analysis

SK04: Development Opportunities

Site Photographs VP1 - VP8



LEGEND	
	Redline Boundary
	Wavendon Strategic Buffer
	Public Right of Way
	Strategic MRT line
	Strategic City Extension
	South East Milton Keynes SUE

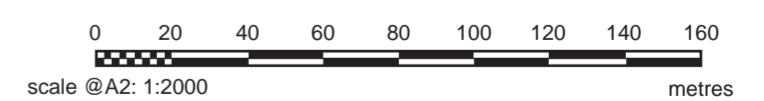
LA6027 Land at Newport Road, Wavendon
 SK00: Wider Context Plan



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LEGEND

— Site Boundary



LA6027 Land at Newport Road, Wavendon
SK01: Site Location Plan

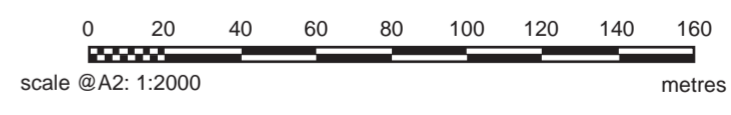


ARCHITECTURE
URBAN DESIGN &
MASTERPLANNING
LANDSCAPE &
ENVIRONMENT



LEGEND

	Redline Boundary		Listed Buildings
	Vegetation structure		Heritage cluster (Cross End & Manor)
	Public Right of Way		Development cluster
	Green Infrastructure corridors		Setting of Wavendon Manor



LA6027 Land at Newport Road, Wavendon SK02: Site Analysis

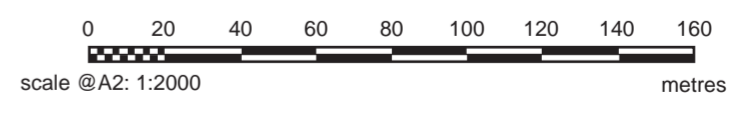


ARCHITECTURE
URBAN DESIGN &
MASTERPLANNING
LANDSCAPE &
ENVIRONMENT



LEGEND

- Redline Boundary
- Vegetation structure
- - - Public Right of Way
- - - Curtailed views
- - - Vistas
- * Listed Buildings
- Visual Barriers
- Viewpoint Location



LA6027 Land at Newport Road, Wavendon
 SK03: Visual Analysis

ARCHITECTURE
 URBAN DESIGN &
 MASTERPLANNING
 LANDSCAPE &
 ENVIRONMENT



Development Areas	
Parcel 1	Gross: 2.05 hectares
	Net Dev: 1.38ha (67%)
	POS: 0.7ha (33%)
	Units at 36dph: 50
Parcel 2+3	Gross: 9.05 hectares
	Parcel 2 Dev: 1.63ha
	Parcel 3 Dev: 3.92ha
	Net Dev: 5.55ha (61%)
	POS: 3.5ha (39%)
	Units at 36dph: 200

Development Opportunities

The site is located to the east of Wavendon and to the south of the recently developed Eastern Expansion Area of Milton Keynes (Glebe Farm). A draft policy is proposed by MKC to provide a Strategic Gap to Wavendon 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". Wavendon Manor lies to the east of the site and is Grade II listed C-16 house with alterations and lies within a cluster of historic buildings and lanes at Cross End with a distinct architectural character. A line of houses lies to the south fronting onto Newport Road and extending along Cross End with some new, large detached houses backing onto the site.

The site provides a development opportunity for new housing which extends the existing development parcels whilst maintaining the setting of both Wavendon village and the historic Cross End cluster around the Manor. The character of Newport Road to the western boundary would be retained with a substantial landscape buffer to maintain the separation to Wavendon. The PRow through the site forms a natural break between parcels and retains the visual link east-west through the site. Development to the south would form a natural extension to existing housing with an access directly off Newport Road. This provides the opportunity for a vista to open up to Wavendon Manor terminating at a new public space that creates a development offset to the historic asset.

LEGEND

- Redline Boundary
- - - Existing PRow
- ⋯⋯⋯ Proposed footpaths
- * Indicative SuDS location
- Landscape buffers
- Development parcels
- ➔ Primary access points
- Easement to gas main (6m)
- * Location of children's play

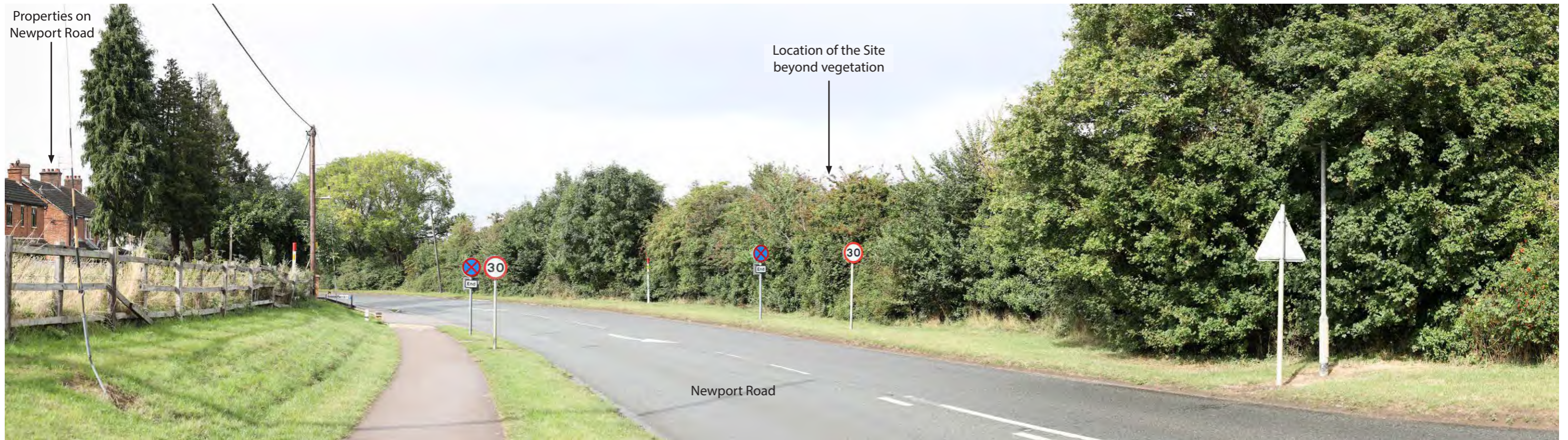
LA6027 Land at Newport Road, Wavendon

SK04: Development Opportunities



Viewpoint 1

Location of view: Footpath along Newport Road where it meets PRow, looking north east towards the site
Notes: Summer view, cloudy with sunny spells, very good visibility



Viewpoint 2

Location of view: Footpath along Newport Road looking north towards the site screened by vegetation
Notes: Summer view, cloudy with sunny spells, very good visibility

LA6027 Land off Newport Road, Wavendon

Viewpoints VP1 & VP2



Viewpoint 3

Location of view: Footpath along Newport Road on the edge of Wavendon, looking east towards the site
Notes: Summer view, cloudy with sunny spells, very good visibility



Viewpoint 4

Location of view: Grass verge along Newport Road, looking south towards the site
Notes: Summer view, cloudy with sunny spells, very good visibility

LA6027 Land off Newport Road, Wavendon

Viewpoints VP3 & VP4



Viewpoint 5

Location of view: Footpath along Lower End Road alongside existing development, looking south east towards
Notes: Summer view, cloudy with sunny spells, very good visibility



Viewpoint 6

Location of view: Taken from within the site looking north east
Notes: Summer view, cloudy with sunny spells, very good visibility

LA6027 Land off Newport Road, Wavendon

Viewpoints VP5 & VP6



Viewpoint 7

Location of view:	Taken from within the site looking north across the existing field
Notes:	Summer view, cloudy with sunny spells, very good visibility



Viewpoint 8

Location of view:	Taken from verge along Lower End Road, looking south west towards the site
Notes:	Summer view, cloudy with sunny spells, very good visibility

LA6027 Land off Newport Road, Wavendon

Viewpoints VP7 & VP8



PROJECT NOTE – NEWPORT ROAD, WAVENDON

1.0 INTRODUCTION

- 1.1. IDP Landscape Ltd are appointed by the clients (David Wilson Homes and Abbeygate Developments) to provide professional advice on landscape and visual matters regarding the promotion of land for proposed residential development off Newport Road, Wavendon. The site is located between a cluster of housing known as Cross End to the east and Wavendon to the west which are connected via a public footpath through the site. To the north the urban extent of Milton Keynes extends to Newport Road and Lower End Road with a significant amount of housing having been developed recently with the ‘Eastern Expansion Area’. Glebe School lies within this urban area with the playing fields located immediately to the north of the site (refer to SK00 Wider Context Plan).
- 1.2. The purpose of this commission is to carry out a high-level appraisal of the site and study area, through an assessment of the landscape and visual characteristics of the area and to inform the opportunities and constraints that will form part of the background information for the promotion of this site. This LVIA note has been carried out by Kevin Charsley, managing director of IDP Landscape Ltd, a chartered landscape professional with experience of providing impartial judgements as part of LVIA and Appeals.
- 1.3. A site visit has been carried out following instruction and informed by a desktop study to establish the wider implications of developing the land within the control of the client.

2.0 SITE DESCRIPTION

- 2.1. The site lies immediately to the east of Wavendon on land currently open and defined by Newport Road to the west, Lower End Road to the north, Cross End to the east and a line of houses fronting Newport Road to the south. The site consists of two fields surrounded by mature hedgerows and trees with a line of mature Lime trees through the centre along

the route of an existing Public Right of Way (PRoW). This is likely to have been the main route between Wavendon and Cross End historically, with the PRoW continuing east to Wavendon House. Cross End is a collection of historic buildings infilled with new housing creating a cluster of development which extends along the lane to join the housing to the south (refer to SK02 Site Analysis). This essentially land-locks the site with development other than the single broadly square field to the northeast corner.

- 2.2. A large strategic urban extension is planned to the east of Wavendon as indicated on SK00 as well as a new transport route (MRT – Mass Rapid Transit) through Wavendon and to link on to Newport Road with a new roundabout. To the south is the South East Milton Keynes urban extension which will provide 3000 homes encompassed by Tilbrook, Browns Wood and Wavendon to the north, Woburn Sands to the east, and the Greensands Ridge to the south.

3.0 LANDSCAPE & VISUAL ANALYSIS

- 3.1. The site lies in a juxtaposition of old and new development in the wider setting of the city of Milton Keynes. The historic assets of the centre of Wavendon and Cross End have been encompassed by more modern buildings creating zones of development that populate the landscape and form a mosaic of urban areas and landscape structure. This is evident as you pass along some of the local roads through contemporary new developments and then along historic high streets, as well as large, detached houses in extensive grounds with rural type views. It is an evolving landscape which influences the key characteristics of the area and creates different character areas within relatively small areas.
- 3.2. The landscape structure around the site is strong, with mature hedgerows along all boundaries which largely screening the site from surrounding views. On entering the site, it contains areas of rough grassland and open views across to the boundaries, with a prominent row of mature trees through the site. The field to the northeast is completely enclosed by vegetation and is grazed grassland. Milton Keynes eastern expansion area lies

to the north and is visually prominent along local roads and has completely changed the character of the area, as will the Strategic City Extension to the east and the South East expansion. Newport Road is flanked by housing to the west at Wavendon and then to the north at Cross End, and views into the site are curtailed by trees and hedgerow which acts as a visual barrier (refer to SK03 Visual Analysis).

- 3.3. Wavendon Manor lies to the east of the site and is an extended Grade II Listed 16th Century house with a pond and mature grounds. Although the Manor is not visible from the wider area, it is located on the boundary with the site with views into the open field.
- 3.4. Taking into account the site and setting in the wider context of the urban expansion, there is a strong sense of identity within each of the different character areas which remain distinct despite the evolving urban landscape that surrounds them. Wavendon lies immediately adjacent to the recently constructed eastern expansion and Cross End will see a similar urban extension to its east. The site whilst it remains open does not have a strong relationship with the adjacent development other than the public footpath and the tree-lined connection. The remainder of the site is unremarkable and well enclosed by the boundary vegetation.
- 3.5. It is noted that the Council in their first Draft Milton Keynes City Plan 2050 have allocated the site as part of a strategic buffer (Policy GS16 Wavendon Strategic Buffer). This is exclusive to Wavendon and is stated 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”*. It doesn’t appear that any further evidence or justification has been published to support this designation. This will be analysed below.

4.0 RECOMMENDATIONS

- 4.1. The site provides a development opportunity for new housing which would extend the



existing development parcels whilst maintaining the setting of both Wavendon village and the historic Cross End cluster around the Manor. The northern part of the Site up to the existing PRoW could be developed to mirror the housing to the north of Lower End Road, accessed directly and separately to provide two new parcels closely related to Glebe Farm and the character of Lower End Road.

- 4.2. The PRoW through the site forms a natural break between parcels to form a wide landscape buffer and retains the visual link east-west through the site. Development to the south would form a natural extension to existing housing with an access directly off Newport Road. The character of Newport Road to the western boundary would be retained with a substantial landscape buffer to maintain the separation to Wavendon. This buffer would provide the opportunity to link the existing green infrastructure in Glebe Farm to extend along the western boundary of the site and link to the existing PRoW network to the south of Newport Road. Although the blanket buffer imposed by the draft City Plan seeks to neutralise the whole site, there is sufficient space to provide an appropriate offset to development whilst providing the additional housing provision.
- 4.3. The new access to parcel 3 will provide the opportunity for a vista to open up to Wavendon Manor terminating at a new public space that creates a development offset to the historic asset. The gas main easement has been allowed for through the site beneath new streets, and proposed sustainable drainage systems (SuDS) can be accommodated on site for each parcel independently.
- 4.4. As illustrated on plan SK04 Development Opportunities, there is the potential for the site to be developed in such a way that retains the existing landscape structure, the character and setting of each existing development cluster, and the important attributes of the heritage assets.

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BA (Hons) Dip LA CMLI



APPENDICES

SK00: Wider Context Plan

SK01: Site Location Plan

SK02: Site Analysis

SK03: Visual Analysis

SK04: Development Opportunities

Site Photographs VP1 - VP8



LEGEND	
	Redline Boundary
	Wavendon Strategic Buffer
	Public Right of Way
	Strategic MRT line
	Strategic City Extension
	South East Milton Keynes SUE

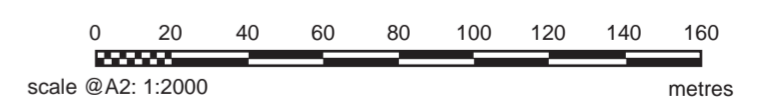
LA6027 Land at Newport Road, Wavendon
 SK00: Wider Context Plan



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LEGEND

— Site Boundary



LA6027 Land at Newport Road, Wavendon
SK01: Site Location Plan

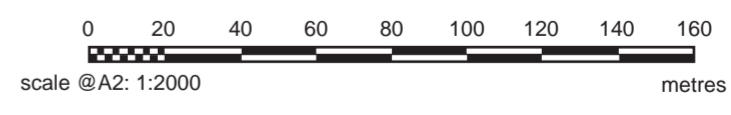


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LANDSCAPE &
ENVIRONMENT



LEGEND

	Redline Boundary		Listed Buildings
	Vegetation structure		Heritage cluster (Cross End & Manor)
	Public Right of Way		Development cluster
	Green Infrastructure corridors		Setting of Wavendon Manor



LA6027 Land at Newport Road, Wavendon SK02: Site Analysis

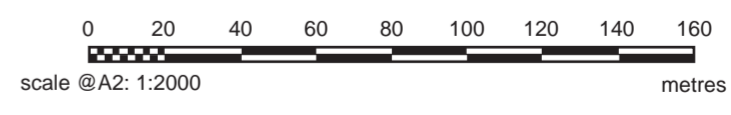


ARCHITECTURE
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LEGEND

- Redline Boundary
- Vegetation structure
- - - Public Right of Way
- - - Curtailed views
- <- - - - -> Vistas
- * Listed Buildings
- ~ Visual Barriers
- 8 Viewpoint Location



LA6027 Land at Newport Road, Wavendon

SK03: Visual Analysis



Development Areas	
Parcel 1	Gross: 2.05 hectares
	Net Dev: 1.38ha (67%)
	POS: 0.7ha (33%)
	Units at 36dph: 50
Parcel 2+3	Gross: 9.05 hectares
	Parcel 2 Dev: 1.63ha
	Parcel 3 Dev: 3.92ha
	Net Dev: 5.55ha (61%)
	POS: 3.5ha (39%)
	Units at 36dph: 200

Development Opportunities

The site is located to the east of Wavendon and to the south of the recently developed Eastern Expansion Area of Milton Keynes (Glebe Farm). A draft policy is proposed by MKC to provide a Strategic Gap to Wavendon 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". Wavendon Manor lies to the east of the site and is Grade II listed C-16 house with alterations and lies within a cluster of historic buildings and lanes at Cross End with a distinct architectural character. A line of houses lies to the south fronting onto Newport Road and extending along Cross End with some new, large detached houses backing onto the site.

The site provides a development opportunity for new housing which extends the existing development parcels whilst maintaining the setting of both Wavendon village and the historic Cross End cluster around the Manor. The character of Newport Road to the western boundary would be retained with a substantial landscape buffer to maintain the separation to Wavendon. The PRow through the site forms a natural break between parcels and retains the visual link east-west through the site. Development to the south would form a natural extension to existing housing with an access directly off Newport Road. This provides the opportunity for a vista to open up to Wavendon Manor terminating at a new public space that creates a development offset to the historic asset.

LEGEND

- Redline Boundary
- - - Existing PRow
- ⋯⋯⋯ Proposed footpaths
- * Indicative SuDS location
- Landscape buffers
- Development parcels
- ➔ Primary access points
- Easement to gas main (6m)
- * Location of children's play

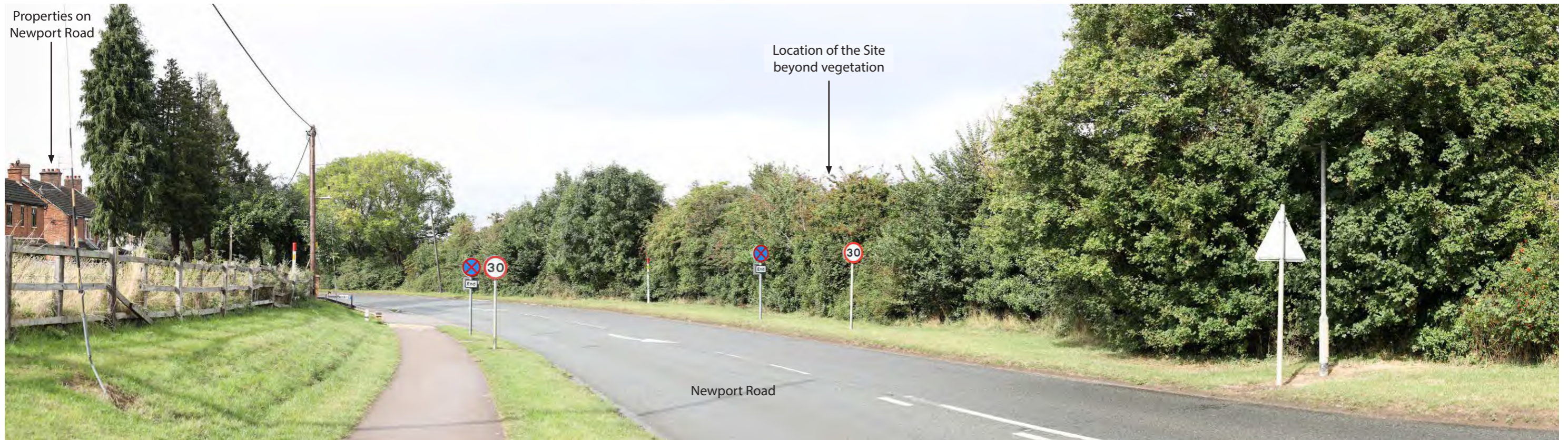
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SK04: Development Opportunities



Viewpoint 1

Location of view: Footpath along Newport Road where it meets PRow, looking north east towards the site
Notes: Summer view, cloudy with sunny spells, very good visibility



Viewpoint 2

Location of view: Footpath along Newport Road looking north towards the site screened by vegetation
Notes: Summer view, cloudy with sunny spells, very good visibility

LA6027 Land off Newport Road, Wavendon

Viewpoints VP1 & VP2



Viewpoint 3

Location of view: Footpath along Newport Road on the edge of Wavendon, looking east towards the site
Notes: Summer view, cloudy with sunny spells, very good visibility



Viewpoint 4

Location of view: Grass verge along Newport Road, looking south towards the site
Notes: Summer view, cloudy with sunny spells, very good visibility

LA6027 Land off Newport Road, Wavendon

Viewpoints VP3 & VP4



Viewpoint 5

Location of view: Footpath along Lower End Road alongside existing development, looking south east towards
Notes: Summer view, cloudy with sunny spells, very good visibility



Viewpoint 6

Location of view: Taken from within the site looking north east
Notes: Summer view, cloudy with sunny spells, very good visibility

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Viewpoints VP5 & VP6



Viewpoint 7

Location of view:	Taken from within the site looking north across the existing field
Notes:	Summer view, cloudy with sunny spells, very good visibility



Viewpoint 8

Location of view:	Taken from verge along Lower End Road, looking south west towards the site
Notes:	Summer view, cloudy with sunny spells, very good visibility

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Viewpoints VP7 & VP8