

**Representor ID:** RP-161

**UI Representor ID:** 810

**UI Representation ID:** 879

**Representor Name:** Mark Harris

**Representor Organisation:** Redrow / Storey /Davidsons

<b>Policy:</b> Policy INF1		
<b>Legal Compliant:</b>	<b>Soundness Compliant:</b>	<b>Duty to Cooperate Compliant:</b>
Yes	No	Yes
<b>Paragraph</b>		
<b>Compliance Comment</b>		
<p>This representation is made on behalf of Redrow Homes, Storey Homes and Davidsons Developments (the ‘Consortium’). Together they control c.70% of the land allocated within policy GS15 – East of Wavendon Strategic City Extension (EWSCE). The Consortium are strongly supportive of the allocation, but have made specific comments on the wording of policy GS15. However, they consider it necessary to comment on policy INF1 due to the implications the policy may have on delivery of the EWSCE.</p> <p>The comments below seek amendments to the wording of the policy to ensure that the new developments are not providing an unnecessarily high contribution to new school places.</p> <p>Policy INF1 sets out that proposals for over 10 dwellings will need to address the broad infrastructure requirements set out in the Infrastructure Delivery Plan (IDP). This policy will therefore apply to the strategic allocations.</p> <p>The Consortium do not have an issue with the principle of sites delivering infrastructure (or providing contribution) that is required to mitigate the impacts of development – this should be a given. However, linking the policy to the specific requirements of the IDP and the Infrastructure Planning Benchmarks at Annex F is a concern given the level of specific detail that is included.</p> <p>Specifically on the education requirements, the Consortium have a number of concerns regarding the approach taken to quantifying and planning the future school needs on housing allocations.</p> <p>We have found several of the assumptions made in establishing the requirements somewhat surprising. The IDP seems to suggest that changes in birth rates, and therefore demand for education places, are cyclical and therefore the current significant surplus of school places across the City is simply a ‘dip’ in demand. This is incorrect and fails to recognise well established trends that affect birth rates as a City grows, plus the macro changes in society that are leading to lower births rates more generally.</p> <p>Enclosed alongside this representation is a graph showing how births and birth rates have changed in Milton Keynes between 2013 and 2024 (this is the only data available for Milton Keynes currently available on the ONS NOMIS website).</p>		

Most obviously, the number of births recorded each year has declined, yet during this period over 19,500 dwellings were built. The reasons for this are complex, but key to understanding this is the age at which mothers are giving birth, which is measured as Age Specific Birth Rates (ASFRs). The data clearly shows that the under-20 ASFR has declined significantly, which reflects changing societal views on teenage pregnancies, which is highly unlikely to change.

Significant decreases in the ASFRs for 20-24 and 25-29 year olds reflect the increased numbers of women pursuing higher education and careers, which is also highly unlikely to change. ASFRs for 30-34 and 35-39 year olds also show declines, but less than younger age groups. The 30-34 year olds are expected to continue to be the main demographic for births in the future while those in the 35-39 year old cohort are likely to continue to struggle with declining fertility with age. This continues into the 40-44 and 45+ ASFRs, which have seen limited change and are unlikely to materially change in the future.

Consequently, the decline in births is not simply a dip but rather a reflection of wider societal changes that are highly unlikely to change materially in the foreseeable future.

These trends are compounded by two other key factors. First, as mothers have children at a greater age, the probability of them having another child greatly diminishes. Therefore, even if the original intention was to have a larger family, many are finding that they have left it too late to have more children. Second, as the entire population ages, the proportion of dwellings that are occupied by women of childbearing age greatly diminishes. For Milton Keynes in particular this is significant since it has grown very quickly through the migration of young people to the area over the last 50 years, which has then led to a rapid ageing of those populations.

Consequently, it is incorrect for the IDP to discount existing surplus school capacity from future demand on the basis it will be required in the future.

In addition, the IDP and Annex F benchmarks suggests an extraordinarily high fixed pupil yield that is far greater than those suggested in the recent DfE pupil yield dashboard, which then exaggerates the future demand for school places on completion of each allocation (and generally across Milton Keynes). This will compound the current issues that MKCC have with surplus spaces since the relatively high pupil yields seen initially in new developments, as a result of those young migrants to the area, will soon decline to reflect the much lower average pupil yields seen across already established areas of the City driven by the ageing population and declining birth rates described above.

These issues are easily remedied in policy by simply requiring each allocation to meet the net additional demand for education spaces within the school place planning area that is located, rather than seeking to strictly control the amount of school capacity each allocation should deliver, and for the pupil yields set out in Annex F to be removed and considered on an allocation by allocation basis, which is particularly important given pupil yields vary over time.

#### **Modification Comment**

Update policy requirements for strategic allocation to refer to them meeting the 'net' additional need for school places.

Remove the unjustified pupil yields from Annex F

<b>Appear at examination?</b>	Yes
<b>Appear at examination reason?</b>	
To discuss in more detail the issues with and implications of the unjustified approach to school place planning on the delivery of the strategic housing allocations.	

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<b>Policy:</b> Policy GS2		
<b>Legal Compliant:</b>	<b>Soundness Compliant:</b>	<b>Duty to Cooperate Compliant:</b>
Yes	No	Yes
<b>Paragraph</b>		
<b>Compliance Comment</b>		
<p>This representation is made on behalf of Redrow Homes, Storey Homes and Davidsons Developments (the 'Consortium'). Together they control c.70% of the land allocated within policy GS15 – East of Wavendon Strategic City Extension (EWSCE) which will contribute to meeting housing need over the plan period. The Consortium are strongly supportive of the allocation of the EWSCE and have made comments on policy GS15.</p> <p>Related to these comments, this representation identifies the Consortium's concerns with the assumptions made about the timely delivery of homes over the plan period, in support of the representations made in response to policy GS15 on the need to remove the restriction on development until 2038.</p> <p>The Consortium are supportive of the New City Plan identifying land for 59,779 homes to help ensure the minimum need of 50,372 can be delivered over the plan period. This represents a buffer of some 19% in land supply which is considered appropriate given the nature of the supply identified to meet the requirement.</p> <p>There is a heavy reliance on strategic scale sites to meet the need. This has historically always been the case in Milton Keynes given the nature of the city and the level of growth that has been planned and delivered. However, as is discussed separately in relation to the Housing Trajectory, the delivery of strategic sites are more open to risks to timely delivery, evidenced by the fact that the MK Western Expansion Area, allocated in the 2005 Local Plan is still under development, and therefore it is logical that a buffer is built in to mitigate against a shortfall in delivery.</p> <p>As is also covered in more detail in relation to the housing trajectory, the Consortium have some concern that the delivery of 16,000 homes in Central Milton Keynes is overly ambitious. The majority of the homes to be delivered are on unidentified sites and will rely on the redevelopment of existing buildings. There can be no certainty that this level of development in Central Milton Keynes is deliverable or developable over the plan period, particularly given current challenges with the viability of high-density development proposed for the area.</p> <p>Whilst the buffer in supply will largely mitigate the slippage or under-delivery identified above, to maximise the chances of the minimum LHN being met over the plan period it is important that there is no impediment to allocated sites being</p>		

delivered in a timely manner. This reinforces the need to remove the restriction on delivery until 2038 placed on the East of Wavendon Strategic City Extension set out in policy GS15, which is addressed in our representations on that policy.

**Modification Comment**

A reconsideration of the ability of 16,000 homes to be delivered in Central Milton Keynes in the plan period.

Removal of the 2038 restriction on delivery in policy GS15.

**Appear at examination?**

Yes

**Appear at examination reason?**

To discuss in more detail the deliverability of sites that are proposed to contribute to meeting housing need over the plan period, in the context of the contribution that the East of Wavendon Strategic City Extension could make to meeting housing need ea

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**Representor Name:** Mark Harris

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<b>Policy:</b> Policy GS11		
<b>Legal Compliant:</b>	<b>Soundness Compliant:</b>	<b>Duty to Cooperate Compliant:</b>
Yes	No	Yes
<b>Paragraph</b>		
<b>Compliance Comment</b>		
<p>This representation is made on behalf of Redrow Homes, Storey Homes and Davidsons Developments (the 'Consortium'). Together they control c.70% of the land allocated within policy GS15 – East of Wavendon Strategic City Extension (EWSCE). The Consortium are strongly supportive of the allocation of the site and have made specific comments on the wording of policy GS15. This site has a relationship with the edge of the Milton Keynes Authority area and therefore there are potential cross boundary implications in the future, making policy GS11 relevant to the site. The rationale behind policy GS11 is sound and the policy is necessary to ensure that growth and development in the 'wider Milton Keynes' area is joined up. However, the Consortium have a concern that the policy seeks to place policy restrictions on developments outside the Milton Keynes authority area which it cannot do, and it is suggested that the policy in its current form is ineffective. This can be rectified by a modification to the text of the policy to make it clear that the requirements, which are largely sound, are what Milton Keynes City Council will encourage developments to deliver/achieve, rather than reading as requirements against which Milton Keynes will assess proposals, which are outside of their remit. In terms of the specific requirements of the policy, it is unclear why access from the H6 Whitney roundabout into Shenley Park (Buckinghamshire) is specifically referenced in the policy when there are numerous other examples of site-specific cross boundary requirements that the policy could seek to identify. These include the desire to link the development of the East of Wavendon Strategic City Extension to potential future growth in Central Bedfordshire (as noted in policy GS15). It is suggested that policy GS11 would benefit from the addition of key strategic cross boundary ambitions for other sites to ensure these are transparently presented to developers and neighbouring authorities.</p>		
<b>Modification Comment</b>		
<p>Amendments to the wording of the policy to ensure it is effective in shaping cross boundary growth.</p> <p>Additional detail required to re-affirm the key site specific cross boundary ambition for all sites with a cross boundary relationship.</p>		

<b>Appear at examination?</b>	Yes
<b>Appear at examination reason?</b>	
To participate in the discussion about any possible amendments to the policy which may affect the Consortium's land interests.	

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<b>Policy:</b> Policy GS15		
<b>Legal Compliant:</b>	<b>Soundness Compliant:</b>	<b>Duty to Cooperate Compliant:</b>
Yes	No	Yes
<b>Paragraph</b>		
<b>Compliance Comment</b>		
<p>This representation is made on behalf of Redrow Homes, Storey Homes and Davidsons Developments (the 'Consortium'). Together they control c.70% of the land allocated within policy GS15 – East of Wavendon Strategic City Extension (EWSCE). The Consortium strongly support the principle of the allocation, which has been justified by a robust assessment of reasonable alternatives, as set out in the Sustainability Appraisal report. However, they have identified a number of issues with the specific criteria listed within the policy which need to be addressed prior to adoption to ensure the Plan is sound.</p> <p>These issues are addressed in detail in the attached report, which is supported by notes on heritage impacts, highways and design.</p> <p>In summary, the Consortium consider that two specific changes are required to make the New City Plan sound. These are the removal of the restriction on development until 2038 and the deletion of the Concept Masterplan for the site. There are also a number of more minor changes that are considered necessary to ensure the policy is effective.</p>		
<b>Modification Comment</b>		
<p>Removal of the restriction on development until 2038.</p> <p>Removal of the concept masterplan.</p> <p>Amendments to the size of the District Park to a minimum of 12 hectares.</p> <p>Amendment to the policy wording to refer to the Newport Road access as a primary access.</p>		
<b>Appear at examination?</b>	Yes	
<b>Appear at examination reason?</b>		
<p>As the main promoter of the site, it is important that they are participate in the discussion regarding the soundness of the policy for site to ensure any amendments to the policy support the delivery of the proposed development,</p>		

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<b>Policy:</b>		
<b>Legal Compliant:</b>	<b>Soundness Compliant:</b>	<b>Duty to Cooperate Compliant:</b>
Yes	No	Yes
<b>Paragraph</b>		
The strategic allocations for growth comprise a mix of very large greenfield to relatively small-scale brownfield sites:Wolverton Railway Works Strategic Brownfield Site, mixed-use residential developmentWalton Campus Strategic Brownfield Site, mixed-use		
<b>Compliance Comment</b>		
<p>This representation is made on behalf of Redrow Homes, Storey Homes and Davidsons Developments (the ‘Consortium’). Together they control c.70% of the land allocated within policy GS15 – East of Wavendon Strategic City Extension (EWSCE). As the main landowners for the EWSCE, the Consortium strongly support the principle of the allocation but have raised specific comments on the wording of the policy.</p> <p>However, they also have a couple of general comments to make which are relevant to the allocations in general. These relate to the Concept Masterplans for each allocation, which it is suggested need to be removed to ensure the New City Plan is effective, and the inconsistent approach to the restriction on the timing of delivery, which only applies to the EWSCE. This matter can be rectified by the removal on the restriction in policy GS15.</p> <p>Concept Masterplans:</p> <p>Firstly, most (but not all) of the allocations have Concept Masterplans. It is unclear why it is necessary for some sites to have masterplans and others not. Those that are provided are not presented on a consistent basis with the EWSCE masterplan being referred to as a ‘constraints and opportunities’ masterplan but the others omitting reference to constraints and opportunities. It is unclear why a different approach has been taken to specific sites.</p> <p>Secondly, none of the concept masterplans are referred to in policy. The supporting text refers to them being the starting point for preparing Development Frameworks for each of the sites, however this is not clear from the reading of individual policies. The Consortium have set out in response to policy GS15 that the removal of the Concept Masterplan for the EWSCE is necessary for soundness, helping to ensure the New City Plan is effective. However, given the above comments, it is additionally suggested that all of the Concept Masterplans may be best omitted from the New City Plan to avoid any ambiguity as to their purpose and role.</p> <p>Restriction on Delivery:</p>		

The EWSCE has a policy requirement that the development cannot commence until 2038. Specific comments on why this approach is not sound are set out in relation to policy GS15, but it is of note that the same restriction does not apply to any of the other allocations despite them also being adjacent to the authority boundary or on the edge of an existing allocation, part of the rationale for the restriction of the EWSCE.

The Consortium note that the South of Bow Brickhill Strategic City extension adjoins the SEMK allocation in a similar way to the EWSCE. The relationship with SEMK is one of the reasons given for delaying delivery in the EWSCE. It is therefore unclear why the same restriction has not been applied to the Bow Brickhill site.

Similarly, the East of the City Strategic City Extension adjoins an existing allocation east of the M1 motorway which has only just commenced development. It also adjoins Central Bedfordshire, with one of the site promoters also promoting the fact that the allocation could extend to the east in to Central Bedfordshire. The site is therefore effectively in a very similar position to the EWSCE in terms of uncertainty, however there is no restriction on delivery.

The Consortium are not advocating that these allocations should be subject to a restriction on delivery, but the points are highlighted to demonstrate why it is not necessary or justified to include the 2038 restriction on the EWSCE allocation.

**Modification Comment**

Deletion of concept masterplans from the Plan.  
Removal of the restriction on development until 2038 set out in policy GS15.

<b>Appear at examination?</b>	Yes
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**Appear at examination reason?**

To discuss in more detail the role of the concept masterplans in the Plan and the the need for a consistent approach to the use of restrictions on when site can be delivered.

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<b>Policy:</b>		
<b>Legal Compliant:</b>	<b>Soundness Compliant:</b>	<b>Duty to Cooperate Compliant:</b>
Yes	No	Yes
<b>Paragraph</b>		
The MK City Plan 2050 delivers balanced growth across a wide range of locations which:Focuses on regenerating and reusing previously developed land, commonly referred to as brownfield land, to deliver as many new homes as possible;Maximises the delivery o		
<b>Compliance Comment</b>		
<p>This representation is made on behalf of Redrow Homes, Storey Homes and Davidsons Developments (the 'Consortium'). Together they control c.70% of the land allocated within policy GS15 – East of Wavendon Strategic City Extension (EWSCE). The Consortium are strongly supportive of the allocation but have commented on policy GS15, raising concerns with the restriction on development until 2038. These comments are directed to the housing trajectory, related to the 'Delivering on our needs and ambitions for homes' section, and are made to highlight issues with the delivery assumptions made for the land supply in the Plan, which reinforce the need to remove the unjustified 2038 restriction in policy GS15 to aid the effectiveness of the New City Plan.</p> <p>The Consortium highlighted a number of general issues with the housing trajectory in their response on policy GS15. These were:</p> <ul style="list-style-type: none"><li>• The viability and feasibility of delivering up to 740 dwelling per year on land east of the motorway</li><li>• The assumption that there will be 645 dwellings per year constructed in CMK on unidentified sites</li><li>• The viability of delivery in Central Bletchley early in the plan period</li><li>• The viability of delivering the redevelopment of the Wolverton Railway Works</li><li>• The general accuracy of forecasts</li></ul> <p>Of these, they are particularly concerned about the assumption that 16,000 homes will be delivered in CMK over the plan period – generally at a rate of 645 dwellings a year after initial commitments have been assumed to be completed.</p> <p>There has long been interest in increasing the amount of residential development in CMK. Some office buildings have been successfully converted to housing while others have been wholly replaced.</p> <p>Several additional sites have been earmarked for housing for some time (notably around Campbell Park) whilst several other sites have achieved planning permissions. Despite this, delivery has been sporadic with many proposals likely to</p>		

be affected by viability challenges which are affecting high density developments across the country.

Building high density and high-quality developments is expensive, particularly in an area traditionally not thought of as a residential area and therefore lacking key infrastructure such as schools, healthcare, leisure and open space. Such expense can only be viable by renting or selling those properties at a premium. Given the historically high cost of living that is affecting the UK at present, the market for such properties is heavily constrained and therefore investors have limited confidence to proceed to the rate of development that the Plan's housing trajectory implies.

It is certainly possible that the viability situation may change through assistance from central government or the high cost of living receding in the future. It may also be possible that major infrastructure such as the East West Rail section between Bletchley and Cambridge, and/or Universal Studios could provide a catalyst for increased economic activity in CMK.

However, these are all unknowns at this stage, and the Plan cannot place any reliance on their impact in the short to medium term, meaning the forecasts in the housing trajectory are overly optimistic. The Plan should certainly provide the flexibility to accommodate the possibility of significant residential development in CMK, but not at the detriment to the rest of the Plan.

We therefore advocate an approach whereby the Plan focuses on delivering the local housing need of the City through allocations outside of the Centre while the CMK proposals provide the 'top up' or flexibility in supply. This would include removing the restriction on delivery of EWSCE until after 2038 to enable it's delivery earlier in the plan period.

This would take the pressure off housing delivery in CMK and thus provide the time to fully understand how the Centre can accommodate one or two secondary schools and the significant formal open space necessary to support 16,000 dwellings, which does not seem to have been considered in detail so far. For example, it is likely that no single development within CMK will be of sufficient size to deliver a secondary school since the individual development areas are too fragmented by roads. As such, it might be appropriate for the Plan to allocate a specific site for at least one secondary school and model how this might be delivered through development contributions (presumably MKCC would need to deliver the application) and when it might be needed in the context of a more realistic, and site-specific, housing trajectory.

The other key concern is that the trajectory shows 740 dwellings per year are being proposed on what is effectively one large development area east of the city. Whilst it is recognised that this is a large area, there has to be some uncertainty as to whether the proposed level of development can be achieved (as this rate to development has not been achieved in one area across Milton Keynes historically) and be maintained throughout the plan period as is suggested. This is a significant risk to the housing trajectory which the release of the EWSCE before 2038 can help to mitigate against.

The Consortium would also note that it should be possible to update the base date of the trajectory to reflect the fact that the Regulation 19 version of the Plan was prepared post completion of the 2024/25 monitoring year. Inclusion of the actual figures would help the robustness of the trajectory.

**Modification Comment**

Revise the capacity of Central Milton Keynes to reflect challenges in the viability of delivering high density development.  
Review the delivery trajectory for the East of Milton Keynes allocation.  
Rebase the trajectory to run from 2024/25.

<b>Appear at examination?</b>	Yes
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<b>Appear at examination reason?</b>
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To discuss the housing trajectory in more detail on the basis of the implications for the East of Wavendon Strategic City Extension.
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## POLICY GS15 - REDROW HOMES, STOREY HOMES AND DAVIDSONS DEVELOPMENTS

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This representation is made on behalf of Redrow Homes, Storey Homes and Davidsons Developments (the 'Consortium'). Together they control c.70% of the land allocated within policy GS15 – East of Wavendon Strategic City Extension (EWSCE). The Consortium **strongly support** the principle of the allocation, which has been justified by a robust assessment of reasonable alternatives, as set out in the Sustainability Appraisal report. However, they have identified a number of issues with the specific criteria listed within the policy which need to be addressed prior to adoption to ensure the Plan is sound. These issues are addressed in turn below.

In summary, the Consortium consider that two specific changes are required to make the New City Plan sound. These are the removal of the restriction on development until 2038 and the deletion of the Concept Masterplan for the site. There are also a number of more minor changes that are considered necessary to ensure the policy is effective.

### Restriction on development until 2038

Criteria B on policy GS15 sets out that residential development within the EWSCE will not commence until 2038, some 12 years after the anticipated adoption of the Plan. The Consortium do not consider that this restriction is justified nor is it indicative of a plan that has been positively prepared.

As they set out in their Regulation 18 representations, the Consortium consider that the EWSCE is one of the most sustainable of all of the alternative strategic sites assessed by the Council in preparing the New City Plan. This position is based on the conclusions of MKCC's own Sustainability Appraisal Report at Regulation 18 stage (Appendix 2) which scores the sites against nine sustainability objectives. The only site with a higher 'score' is the East of Milton Keynes Strategic City Extension, which benefits due to the scale of the proposed development resulting in greater levels of built in sustainability. The 'scoring' is summarised in the table overleaf.

SITE	OBJECTIVE 1	OBJECTIVE 2	OBJECTIVE 3	OBJECTIVE 4	OBJECTIVE 5	OBJECTIVE 6	OBJECTIVE 7	OBJECTIVE 8	OBJECTIVE 9	Score
Site 9: MK East + Northern and 8 combined	++	++/-	++/-	++/-	++	+/-	+	+	+/-	14
Site 11: East of Wavendon (post 2038)	++/-	++/-	+/-	+/-	++	+/-	+	+	-	8
Site 14: Land South of Bow Brickhill	++	++/-	-/+	+/-	++	-	+	+	-	2
Site 16: Shenley Dens WEA South Extension	-/+	++/-	+/-	-	++	-	+	+	-	-2
Site 15: Levante Gate, land south of A5 McDonalds Roundabout	-/+	-/+	-/+	-	++	-	+	+	-	-9

Despite this position, policy GS15 seeks to restrict the delivery of any homes within the EWSCE until 2038 at the earliest, resulting in the development of one of the most sustainable sites in the New City Plan being unduly delayed, without any sound justification.

The rationale for the 2038 restriction is set out within paragraph 107 of the draft Plan where it states:

*Successful placemaking for this allocation, and its relationship with the surrounding area, will require further detailed consideration including its immediate sensitive environs and notable heritage and ecological assets. To do so successfully will require some strategic matters to have been completed or resolved to a reasonable degree of certainty. This includes infrastructure delivery associated with ongoing growth in the area, notably South East Milton Keynes which is due to complete in 2037/38 and may include new road and transport infrastructure linked to the roll out of new East West Rail services to Bedford and Cambridge (currently planned for 2030). This will likely affect the East of Wavendon allocation's relationship with Woburn Sands. Equally, greater clarity on potential growth areas immediately adjoining the allocation eastward beyond Milton Keynes City will have been reached through the preparation of the next Central Bedfordshire Local Plan, which may potentially offer a different context for considering and agreeing detailed design and layout matters within the allocation.*

It goes on to clarify that 'while the allocation is not directly dependent on these wider strategic matters, they may have implications for the distribution, layout and/or design of the site', clarifying that the restriction is associated with the implications of nearby development and heritage constraints on the form of development on site, rather than the suitability of the site for development.

The Consortium do not consider that this is sufficient justification for the 2038 restriction and believe that to ensure the New City Plan is sound, bullet B of the policy, which includes the 2038 restriction, should be removed.

In response to the rationale raised in paragraph 107, the Consortium have the following points to raise:

### **Consideration of the immediate sensitive environments and notable heritage and ecological assets**

It is unnecessary to delay delivery until 2038 on the basis of the need to further consider the 'sensitive environs' of the site. This has already been done by the Council in their Heritage Impact Assessment and the work prepared by the Consortium (as set out in the Heritage Note on MKCC Heritage Impact Assessment and Concept Masterplan submitted with this representation, prepared by Pegasus).

The policy wording (bullets 4 and 5) also requires consideration of designated and non-designated heritage assets, providing MKCC with an appropriate mechanism to manage the impact on the nearby heritages assets. These constraints are known now, and the implications can be fully considered well before the arbitrary 2038 date.

### **Infrastructure delivery associated with ongoing growth in the area**

The wording of paragraph 107 explicitly refers to the South East Milton Keynes site which lies generally to the southwest of the EWSCS, and the new road and rail infrastructure which may be provided as part of the roll out of East West Rail (EWR) services to Bedford and Cambridge.

In general infrastructure terms, as is discussed further below, there should be no uncertainty as to the infrastructure required as part of new developments as the Council has prepared their Infrastructure Development Plan, which sets out what infrastructure is needed in each area of the city to support the anticipated level of population growth. The requirements are known now and they do not justify the need to delay delivery until 2038.

The Consortium consider that if this were to be the case for the EWSCE then the same issue would apply to the majority of the other strategic allocations, each of which are in areas close to existing development areas with new and developing infrastructure, given the extent of recent growth in Milton Keynes. However, none of the other sites have any restriction on when development can commence. The East of Milton Keynes Strategic City Extension site is a prime example of this with 16,000 additional homes proposed for allocation on the edge of a site which has only just begun commencing development, with very little infrastructure delivered.

In terms of the specific relationship with the SEMK site, there is reference to the need for clarity on the new road and transport infrastructure that may be rolled out as part of the EWR project. Again, this is known now. The Development Framework already provides for a railway bridge to the west of Woburn Sands and it is now known that the station will be relocated into the site – this was confirmed in a recent update report from EWR (Autumn Update Report). Within this report (page 56), it confirms that the new road bridge is intended to be in place by 2030. Therefore, it is not clear why it is necessary to delay development in EWSCE until 2038 to allow this infrastructure to be delivered.

Indeed, part of the justification for the EWR project is to support growth along the route. The stated benefits of the project include encouraging local investment, creating new job opportunities and opening up access to new homes. The recent EWR Report confirms that this includes delivery of the EWSCE (page 54). To delay the delivery of homes in close proximity to one of the consolidated stations is therefore counterintuitive to the objectives of the EWR project – in reality, the correct view should be to seek to maximise delivery of homes close to the station early in the plan period to support EWR, not seek to undermine it by delaying delivery by imposing an arbitrary date on its delivery.

## **Greater clarity on potential growth areas immediately adjoining the EWSCE allocation eastward beyond Milton Keynes City**

At this time, there has been very little progress on the Central Bedfordshire Local Plan. We understand consultation is likely in the summer of 2026. Based on the work that supported the preparation of the adopted Central Bedfordshire Local Plan, where the 'Aspley Triangle' to the east of the EWSCE was initially identified as a 'future development area', there is an expectation that the site may be allocated for development in the emerging local plan. This is, however, not confirmed given that the plan needs to be based on a new evidence base including a consideration of reasonable alternatives.

To delay the delivery of the EWSCE on the basis that an adjacent site may be allocated at some point in the future, is not justified – particularly as there is no guarantee that the 'Aspley Triangle' site will be allocated. The Consortium consider that to be positively prepared, the New City Plan should be taking the lead in setting out the parameters for any development in the area, including matters such as social infrastructure and highways/access, rather than reliance on an adjoining local authority.

This is the case with the Eastern City Strategic Extension which also adjoins Central Bedfordshire and has the potential for land to be allocated in their emerging plan. As noted above, policy GS14 does not contain any restriction on when the development could come forward despite the very similar circumstances to the EWSCE.

If land adjacent to Milton Keynes in Central Bedfordshire were then to come forward for development, this would need to respond to what has been planned within the EWSCE. This is no different to how growth has always been planned and delivered within Milton Keynes, with any strategic city extension responding to the existing and/or planned characteristics of an area. As an example, the aforementioned the Eastern City Strategic City Extension has 16,000 homes planned on the edge of an existing allocation, with the requirements for the allocation building on the parameters established by the adjacent development area.

We have provided separate comments on policy GS11 (Adjacent and cross-boundary growth). However, that policy, alongside the wording of policy GS15 (specifically bullets 14 b and c) provides the basis for considering any future growth to the east of the site. This is sufficient to ensure that the site is planned and delivered in a way that ensures it does not prejudice the delivery of growth into Central Bedfordshire and that this growth ties in appropriately to the EWSCE, which, it has already been established, is sustainable if delivered as a standalone allocation.

It should also be noted that although the Central Bedfordshire Local Plan is not well advanced at this stage, it is likely to be adopted well before 2030, with the latest LDS anticipating adoption by 2028. On this basis, even if the need to plan strategically did provide justification for restricting delivery, it would not justify the 2038 date set out in the New City Plan.

In addition to these specific points in relation to the justification for the 2038 restriction set out in paragraph 107 of the Local Plan, the Consortium would also raise the following comments in relation to the policy requirements which limits the effectiveness of policy GS15.

### **Universal Studios (US)**

Its worthy of note that supporting survey work at the US site near Bedford has begun. MHHCLG received a request to grant Planning Permission on 3rd July 2025 with consultation closing at end of August 2025. The Government approved the request for planning permission by a Special Development Order (SDO) on 16th December 2025.

US is located 8 miles from EWSCE and, importantly, the two locations are strategically connected by the EWR link between Oxford and Cambridge. As noted above, EWR works are underway and service improvements expected by 2030.

Woburn Sands train station, close to EWSCE, is three train stops from the US station at Stewartby. Currently the travel time between both stations is c.20 minutes and frequency and travel time is set to improve as part of the EWR works.

US entertainment resort is nationally significant and designed to accommodate 8.5 million visitors per annum (55,000 visitors per peak day). It aims to create 28,000 jobs 8,000 of which are permanent positions once the resort opens in 2031. Residents in the EWSCE could be employees of US, but the delay in delivery until 2038, leads to the potential where employees will be forced to live and travel from less sustainable locations. This further justifies removal of the restriction.

## **Housing Delivery**

The New City Plan includes a Housing Trajectory at Annex A. We have provided separate comments on the Housing Trajectory but would note that there are several issues with the assumed deliverability of the sites in the period up to 2038. These can be summarised as:

- The viability and feasibility of delivering up to 740 dwelling per year on land east of the motorway
- The assumption that there will be 645 dwellings per year constructed in CMK on unidentified sites
- The viability of delivery in Central Bletchley early in the plan period
- The viability of delivering the redevelopment of the Wolverton Railway Works
- The general accuracy of forecasts

Based on the above, the Consortium therefore do not believe that new homes will be delivered at the rate anticipated in the Housing Trajectory. The delivery of homes within the EWSCE would therefore support early delivery and maximise the chances of the trajectory identified by the Council being delivered to meet housing needs.

As addressed separately in response to Policy GS2, whilst the Consortium are supportive of the approach of the Council to including a buffer in the land supply position over and above the Local Housing Need figure, the delay in delivering homes in EWSCE unnecessarily pushes homes to later in the plan period, increasing the risk that they will be delivered beyond 2050.

These comments are made in the context of the NPPF (paragraph 61) which outlines the Government's objective of significantly boosting the supply of homes. To delay the delivery of one of the most sustainable sites identified by the Council runs counter intuitive to this and provides a strong basis for the removal of the restriction.

## **Delay in Delivering Benefits**

The development of the EWSCE would deliver numerous benefits for the area. Specifically, it will deliver a new District Park (covered further below), new highway infrastructure that has the potential to have a wider benefit to the strategic highway network, and supporting the viability of East West Rail. Delaying development until 2038 unnecessarily hampers the delivery of these benefits.

On the District Park, the Consortium are aware that there is support for its early delivery as an asset for the community. Removal of criteria B would therefore ensure that the Park can be delivered in a timely manner, as part of early infrastructure delivery, for the benefit of the community.

With highway Infrastructure, the Council's Infrastructure Study and Strategy – Initial Assessment Interim Report (May 2024) (Page 105) identifies the existing issues in the local area and the potential benefits that a connecting route through EWSCE could help deliver, including taking traffic away from the Kingston roundabout, limiting the need for rat running

through Wavendon and connecting through into Central Bedfordshire (if further land is allocated in the Central Bedfordshire Local Plan). The delivery of these benefits in the short to medium term are lost if development of the EWSCE is restricted until 2038.

As is addressed in the accompanying Access and Movement Appraisal, prepared by KMC for the Consortium, there is evidence to suggest that, at a strategic level, the improvements the EWSCE could facilitate, can help address the impact of increase traffic flows that will be seen all across Milton Keynes as the city grows. Importantly, the Appraisal also identifies that there is no reliance on other infrastructure projects or sites to enable the EWSCE to be built out, further reinforcing the lack of justification for the 2038 restriction

In summary although the Consortium are strongly supportive of the allocation of the EWSCE, it is considered that the 2038 restriction should be deleted from the plan for a number of compelling reasons:

- The constraints are known now, with appropriate policy wording in place to protect heritage assets.
- Infrastructure requirements are known now, and key EWR infrastructure should be delivered well before 2038.
- The delay limits the support for the viability of the EWR project in the short term, undermining its objectives
- There is no guarantee that further land to the east of the site in Central Bedfordshire will be allocated - and if it is, this will be well before 2038.
- There is a need to support ongoing rates of housing delivery with shortfalls expected against the Council's housing trajectory,
- The delay would cause unnecessary delay to the delivery of significant benefits, including the District Park and highway improvements.
- There is no evidence that there are significant infrastructure requirements that restrict development.

## The Concept Masterplan

A Constraints and Opportunities-Led Indicative Concept Masterplan for the EWSCE is set out at Figure 2 of the New City Plan. The Consortium consider that the removal of the Concept Masterplan is necessary to ensure the soundness of the Plan. The reasons for this are set out in turn below.

### Purpose of the Concept Masterplan

It is noted that policy GS15 does not include any reference to the MKCC Concept Masterplan. It is therefore unclear what the rationale is for its inclusion in the New City Plan. If there were a need for a future development to be consistent with the Concept Masterplan, this should be stated in the policy – it is not and therefore the Consortium consider that its inclusion is not necessary, with the policy wording providing sufficient guidance for the future masterplanning of the Site.

### Articulation of Policy Requirements

Regardless of the above comments on the purpose of the Concept Masterplan, the detail is not consistent with the wording of the policy which it is intended to support. There are numerous examples of this, with the most obvious being the extent of the District Park shown on the Plan which is far in excess of the 15ha requirements set out in the policy,

The Consortium's calculation is that the area identified on the Concept Masterplan as 'New District Park and Landscape Setting for Heritage Assets' extends to c.35ha. This incorporates the former golf course as well as adjoining areas of private open land.

Whilst the requirement for a District Park is noted in the policy, there is no reference to 'landscaped setting for heritage assets', so it is unclear why this is shown on the Plan. Policy GS15 includes requirements to conserve and, where possible, enhance the designated and non-designated heritage assets and their setting – a suitable policy requirement, but the Concept Masterplan appears to translate this into an extended green, undeveloped area that has not been properly justified by the evidence.

The East of Wavendon Heritage Impact Assessment forms part of the Council's evidence base. This document has not gone as far as indicating where development could or could not be accommodated on the site in heritage terms and does not provide a sufficient basis to exclude large tracts of land from being considered for development.

The Consortium's own Heritage Consultant has reviewed the HIA (see accompanying Pegasus report) and has concluded that whilst there is agreement as to some of the sensitivities of the site, it is not grounded in consideration of intrinsic individual significance of the heritage assets in the area to give an appropriate foundation to a consideration of their sensitivity to development.

It goes on to conclude that smaller but appropriately placed and landscaped set backs could achieve similar conservation of heritage significance to retaining the whole golf course as proposed, and as such, the Concept Masterplan plan does not make best use of the land in the allocation.

Pegasus' own assessment (Annex 1 to the accompanying Pegasus report) was provided to the Council during the development of the New City Plan. This includes a more detailed assessment of the heritage constraints of the area and how these could influence the layout and design of development, in line with the policy requirements. This shows how development could be sensitively accommodated in some of those areas shown 'green' on the Concept Masterplan.

Given the Concept Masterplan is not referred to in policy, it is considered that showing the 'landscaped setting for heritage assets' is misleading to the reader, particularly as it could be interpreted that this area is contiguous with the proposed District Park, which has a requirement for a minimum of 15ha (discussed further below).

The consequence of the approach to the District Park shown on the Concept Masterplan is that it significantly reduces the area of the site which is shown as being identified for residential development. The implication of this approach is that the developable areas of the site would need to be built out at a density which may not be compatible with the characteristics of the site and the surrounding area to deliver the anticipated 2,250 dwellings. Although the Consortium are supportive of the proposed site capacity, this is not consistent with what is shown on the Concept Masterplan.

The Consortium consider that the appropriate design response will be to have areas of lower density in the parts of the site closer to the heritage assets and open countryside, and comparable densities along the boundaries with existing development areas. This approach is different to what is shown in the Concept Masterplan. The conflict would be removed by deletion of the Concept Masterplan and taking the time to fully consider the appropriate scope of the developable area and layout of the site through the Development Framework process, informed by more detailed consideration of the site's opportunities and constraints, as has been undertaken by Pegasus.

## **Educational Requirements**

The Concept Masterplan shows the location (indicated by a dot) of an all-through school and a separate primary school. This is additional detail not identified in the policy, which only requires provision appropriate to the scale and nature of the development proposal. Therefore, the Concept Masterplan appears to pre-empt the outcome of further assessment work around the scale and nature of the required education provision.

Whilst there is an assessment in the Council's Infrastructure Delivery Plan, the Consortium do not consider that this is robust given it takes the approach of setting out the maximum school place requirement for the sites without considering existing capacity in the area. Further comments on this matter are set out in response to policy INF1 (Infrastructure First Principles).

Within the IDP (page 48) a surplus of school places generally is identified. This is reiterated for the Eastern area in which the EWSCE lies, where 'notable' surplus capacity is identified in early years through to secondary educational settings (form page 117). This should be taken into account in establishing the requirements for each site – but it hasn't been, with a 'no existing capacity' approach effectively being taken which will lead to an over provision of school places in the local area.

The appropriate time to consider the specific level of provision required within the site is through the development of the Framework Masterplan which will be prepared collaboratively between the landowners and the Council prior to an application being made, and will be informed by an assessment of the need for additional school places in the area.

Therefore, to show schools on the Concept Masterplan at this stage, particularly as no consideration has been given to their land-take, is inappropriate and misleading and again justifies the Concept Masterplan's removal to ensure the soundness of the Plan.

The proposed restriction on delivery until 2038 also reinforces this concern with the Concept Masterplan pre-empting what the education requirements would be well into the future.

### **Lack of Highway Detail**

Unlike the areas noted above where the Concept Masterplan either shows inappropriate detail or mis-applies the policy requirements, in terms of highways infrastructure, there is a notable absence of detail, despite it being a strategically important matter for the area and key to the layout and design of the development.

This approach is different to the other concept masterplans in the New City Plan, each of which show details of the expected primary highway layout, despite it arguably being a less strategically important issue for those sites. To not show at least the key highway infrastructure on the Concept Masterplan is misleading given how fundamental it will be to the overall design and layout of the site, including the useability of the District Park.

Amongst other things, the main highway infrastructure will drive the primary and secondary access points (discussed further below), the location and nature of development blocks and the location of schools. Without the main highway infrastructure being addressed, which is more appropriately considered at Development Framework stage, the Concept Masterplan is not justified and reaffirms the Consortium's position that it should be removed to ensure the soundness of the plan.

### **Design Quality**

Building on the specific points above, the Consortium's urban design consultants, LDA have reviewed the Concept Masterplan (see appended LDA Design Appraisal) which highlights the deficiencies with the Plan in terms of place making. These conclusions reaffirm the Consortium's position that it should be deleted from the Plan to ensure its soundness.

## Other Matters with Policy GS15

Although the Consortium are generally supportive of policy GS15, there are a number of specific points that they wish to make in terms of the detail of the policy

### Size of the District Park

Policy GS15 requires the provision of a District Park of at least 15ha. The rationale for this scale of District Park is not clear nor is it justified.

The Consortium are supportive of the provision of a District Park within the EWSCE as this is an appropriate approach to ensure that the setting of the historical assets in the north of the site is sufficiently protected. However, it is not considered that this drives the provision of an area of parkland of at least 15 ha.

The New City Plan (annex c) notes that District Parks should be a minimum of 12 ha. This should be the starting point for the size of the park.

The Infrastructure Study – Initial Assessment Interim Report (May 2024) (page 102) notes that there is a significant level of existing green infrastructure in the eastern area of the city where the site lies, including 224.76 ha of linear park, which includes the Ouzel Valley Linear Park to the east of the site.

The Infrastructure Delivery Plan (page 121) does not identify any specific issues or capacity constraints in terms of green infrastructure in the area, noting only issues with connectivity of the Ouzel Valley Linear Park to other open spaces. The IDP goes on to identify a requirement for 12.1 ha of natural and semi natural green space (alongside other open space requirements) as a result of the strategic allocations (noting this also includes the 400 homes at the Open University alongside the EWSCE). This does not appear to justify the 15 ha requirement set out in the policy.

On this basis, the Consortium consider that the policy wording should be amended to refer to at least 12 ha of District Park to align with the open space standards in the New City Plan and the evidence on the level of open space needed in the area. The final scale and location of the District Park would be determined through the preparation of the Development Framework for the site where the location and layout would be refined to ensure it provides an appropriate setting for the historical assets as well as supporting other policy requirements, such as delivering a net gain in biodiversity and creating active travel routes.

### Site Capacity

As noted above, the Consortium are supportive of the proposed capacity of the EWSCE at around 2,250 dwellings. From their work, this capacity reflects the constraints of the site and the policy requirements – aside from the scale of the District Park. However, realistically, the capacity will only be achievable if areas of the site outside those shown on the Concept Masterplan are considered developable.

Given the nature and location of the site, although pockets of higher density development will be possible to support the aspiration for the metro to run through the site, there will also be areas of lower density development to ensure an appropriate relationship with the surrounding area and heritage assets which would make delivering the proposed capacity challenging.

The removal of the Concept Masterplan from the New City Plan would negate this issue and is considered necessary for the effectiveness of the Plan.

## **Highways and Site Access**

Bullet 14 of policy GS15 sets out that primary access into the EWSCE will be from the north into Keightley Gate, with secondary accesses onto Newport Road and Cranfield Road.

The Consortium agree that these are the three logical points of access into the site. However, they do not agree that the access onto Newport Road should be considered as a 'secondary' access.

As noted above in relation to the Consortium's concerns with the 2038 delivery restriction, highway infrastructure within the site has the potential to deliver connectivity benefits to the wider highway network, responding to the issues and opportunities identified in the Council's Infrastructure Study and Strategy – Initial Assessment Interim Report (May 2024) (Page 105). To maximise the strategic benefits of the proposal, including taking traffic away from the Kingston roundabout and limiting the need for rat-running through Wavendon village, the Newport Road access should also be considered as a primary access, facilitating a potential link to the west, into the H10 extension which will be delivered through the SEMK site.

Labelling the Newport Road access as secondary suggests that it is not integral to the development of the proposal and the delivery of wider highway benefits, which the Consortium consider is misleading and, to a small degree, impacts the effectiveness of the policy.

Whilst there will need to be more detailed discussions about the nature and location of highway infrastructure within the site through the Development Framework process, the Consortium consider the Newport Road access will be fundamental to delivering the highway benefits of the area and, as such, it should be recognised as a primary access in policy GS15.



# Design Appraisal of GS15 East of Wavendon Strategic City Extension

Representations to Regulation 19  
MK City Plan 2050

17 December 2025



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Appendix 1: Wavendon Park Vision

Appendix 2: Amended Masterplan

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This document has been prepared and checked in accordance with ISO 9001:2000.



# Introduction

This document has been prepared on behalf of Redrow Homes, Davidsons Developments Ltd and Storey Homes (the “Consortium”) as part of their representations to Milton Keynes City Council (“MKCC”) in response to their Regulation 19 MK City Plan 2050, regarding the East of Wavendon Strategic City Extension (EWSCE) draft allocation under Policy GS15. The draft allocation lies immediately north-east of Woburn Sands and south of Lower End Road, with its eastern boundary following the Milton Keynes–Central Bedfordshire authority line. EWSCE covers around 125 hectares, including the former Wavendon Golf Course and land to the east and west of Cranfield Road.

The Consortium control approximately 70% of the draft allocation area.

This document reviews Policy GS15 with regards to the approach related to design of the masterplan, in particular focussing on the location and extent of the proposed District Park as outlined within MKCC Indicative Concept Plan. This document should be read in conjunction with the heritage representations prepared by Pegasus on behalf of the Consortium.

Appended to this document is “Wavendon Park Vision for GS15 East of Wavendon Strategic City Extension” submitted as representations to Regulation 18 MK City Plan 2050 in October 2024. This provides a high-level analysis of constraints and opportunities affecting Wavendon Park resulting with a holistic landscape-led masterplan meeting the draft policy requirements at this time.

Also appended is the amended masterplan responding to updated heritage advice dated April 2025 issued to MK as part of Topic Workshops regarding the draft allocation. This masterplan is used to compare against MKCC approach to masterplanning the draft allocation.

# Draft Allocation Policy GS15

Emerging Policy GS15 EWSCE within Regulation 19 MK City Plan 2050 sets the requirements for delivery of growth at this location.

The preamble to the policy itself outlines the potential changes to forthcoming infrastructure (i.e. East-West Rail), existing allocations (i.e. South-East Milton Keynes) and future allocations within Central Bedfordshire adjacent to the district boundary, which means “*they may have implications for the distribution, layout and/or design of the site*” that will only likely be resolved towards the end of the plan making period (2038 onwards).

Alongside the policy wording, a Constraints and Opportunities-led Indicative Concept Plan (the “Concept Masterplan”) is provided “*to illustrate key elements and how the site may be developed*”. The Concept Masterplan (“CM”) is not referred to within the draft allocation policy itself, but can be considered to illustrate MK’s preferred approach for the area. From this plan, the following can be interpreted:

## Settlement Pattern and Spatial Growth

The CM locates the majority of development within the south-eastern half of the draft allocation area. This would presumably deliver an extension of Woburn Sands in a north-easterly direction, with a second local centre to the existing settlement proposed east of Cranfield Road. A small area of development is located in the north-west of the allocation, south of Keightly Gate and Lower End Road.

## Green Infrastructure

The CM illustrates a proposed District Park, that also serves to deliver the “*landscape setting for heritage assets*”, which refers to Scheduled Monument, Listed Buildings at Lower End, Park Farm, Wavendon House and associated Registered Park and Garden. Apart from the broad location of existing vegetation, no other green infrastructure or open spaces are identified within the CM.

## Access and Movement

Within the CM, the primary multi-modal access point into the draft allocation is to the north-west extending from Keightly Gate in a broadly north-south alignment. A secondary multi-modal access point is identified in the west of the draft allocation off Newport Road, connecting with South-East Milton Keynes allocation in the future in a broadly east-west alignment. All other access points are for active travel only (i.e. walking, cycling etc.) which are generally aligned with existing public rights of way entering the draft allocation area.

No conceptual approach has been taken to the extension of Milton Keynes’ primary highway infrastructure, or the proposed Mass Rapid Transit (MRT) network within the draft allocation, nor to the impact these routes would have on the overall masterplan. However, the CM does illustrate the extension of Redway cycle routes through the draft allocation north of Cranfield Road, but not to south.



**Constraints and Opportunities-Led Indicative Concept Plan for the East of Wavendon Strategic City Extension**



# Approach Comparison of EWSCE

The following pages provide a comparison of approach to designing EWSCE, with reference to emerging policy within MK City Plan 2050 and its evidence base where relevant, regarding the three themes of: Green Infrastructure (GI); Settlement Pattern; and Access & Movement.

## Green Infrastructure

### MKCC Draft Policy GS15 CM

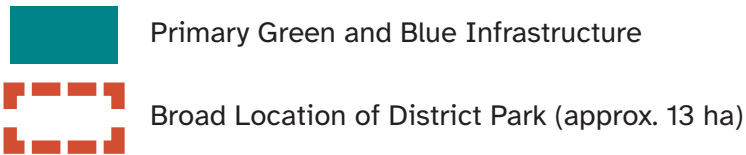


-  Primary Green and Blue Infrastructure
-  Broad Location of District Park (approx. 36 ha)

GI is principally based around delivery of a District Park, which broadly covers the extent of the former golf course, as well as land immediately east and west of Wavendon House. Other green space is located to the edges of the proposed residential areas within the draft allocation. Consequently, green and blue infrastructure is met but connectivity across and beyond the draft allocation is limited given primary single location of green space.

District Park is c. 36ha in area, which significantly over-delivers draft policy GS15 requirement of 15ha, and Annex C of Reg 19 MK City Plan 2050 requiring a minimum of 12ha for District Parks.

Total Green and Blue Infrastructure comes to just over 50ha, which meets MK's Nature, Green and Blue Infrastructure Strategy (NGBIS) target requirement of 40% of draft allocation being green space.



### Consortium 2025 Masterplan



Approach developed by connecting existing green and blue infrastructure through the site focussed along water courses, topography, existing/proposed open spaces and public rights of way. This approach is supported by (NGBIS) 2023 regarding the draft allocation (Option 7: North of Woburn Sands) in order to enhance the existing infrastructure network in order to create '*sustainable access routes for people and habitat connectivity*', endorsed by MKCC '*Place Making Principles*' and '*Healthy Place Principles*'.

Incorporated into the GI approach is a District Park at 13ha that has been shaped to meet the heritage constraints outlined by the Consortium's heritage expert advice. This meets minimum area outlined in Annex C of Reg 19 MK City Plan 2050, albeit 2ha below draft policy GS15.

Total Green and Blue Infrastructure comes to just over 50ha, which meets NGBIS target requirement of 40% of total draft allocation area being green space, , but delivers GI in a more dispersed approach with better access for more people than CM.

# Approach Comparison of EWSCE

## Settlement Pattern

### MKCC Draft Policy GS15 CM

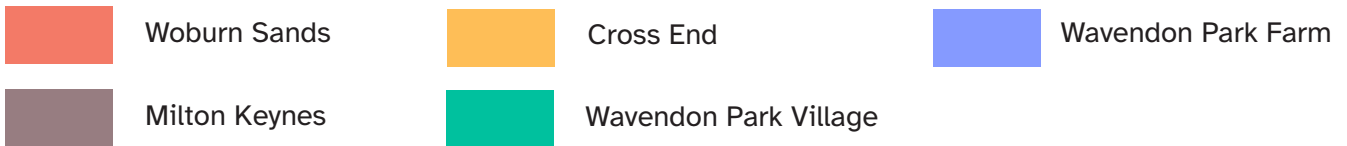


Growth is primarily associated with the extension of Woburn Sands to the north-east. Depending upon proposals within Central Bedfordshire, Woburn Sands could continue extending eastwards, going against Woburn Sands' linear settlement pattern that follows Newport Road/Station Road/Woburn Road north-south up onto higher ground to the south.

Modest extension of existing MK neighbourhood to north-west of draft allocation.

Lower End hamlet maintained distinctly separate from MK and Woburn Sands

District Park maintains settlement linkage between MK and Woburn Sands.



**Consortium 2025 Masterplan**



An area of modest growth associated with Woburn Sands to south-west of draft allocation, with major growth associated with a new neighbourhood area, Wavendon Park Village, to eastern half. The 'village' can extend into Central Bedfordshire creating a seamless transition across the district boundary.

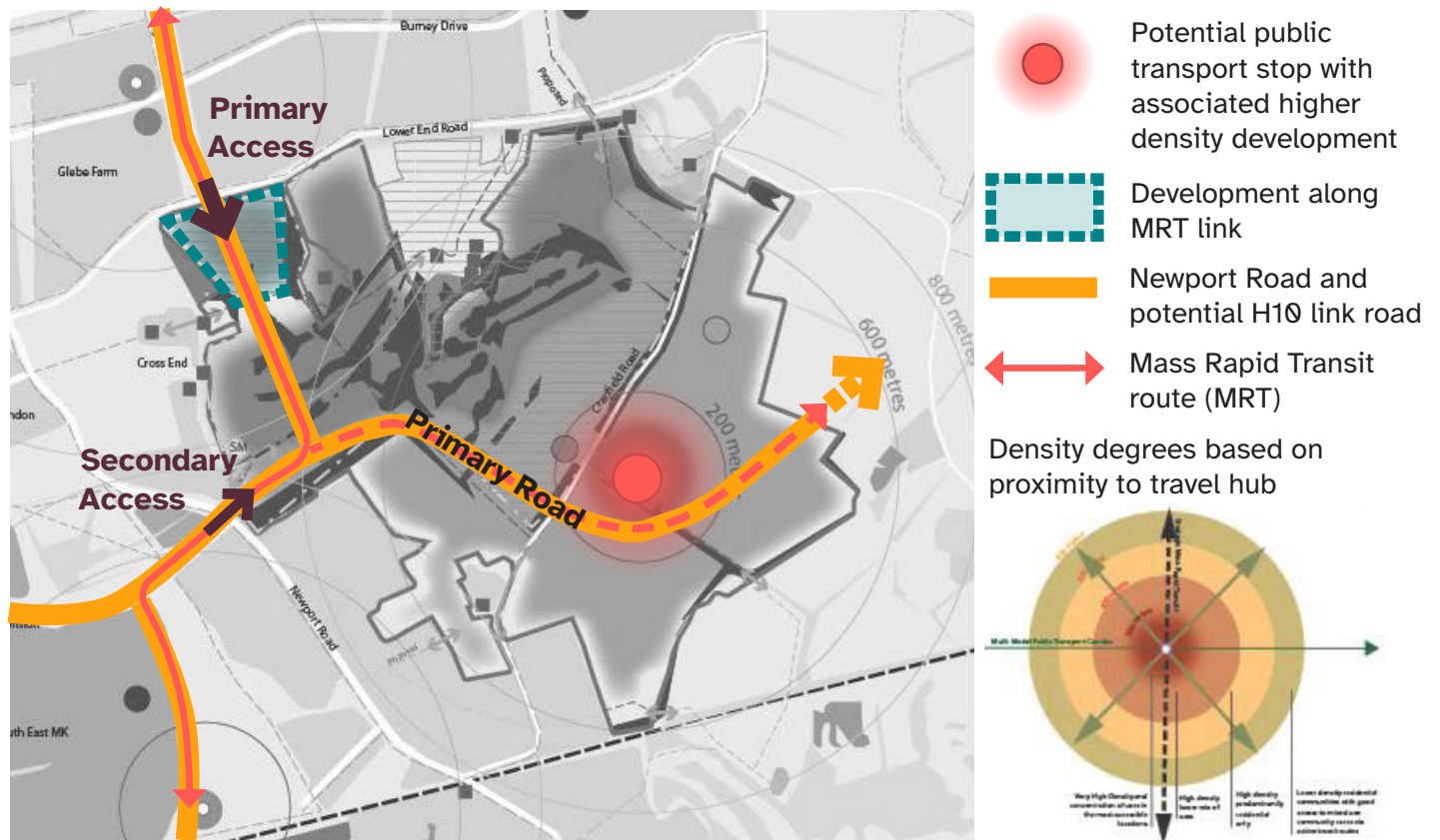
Sensitive growth inspired by heritage of Wavendon House, Park Farm and Lower End is proposed in the north of the draft allocation.

Green infrastructure helps to maintain settlement linkage for existing and proposed urban areas.

# Approach Comparison of EWSCE

## Access and Movement

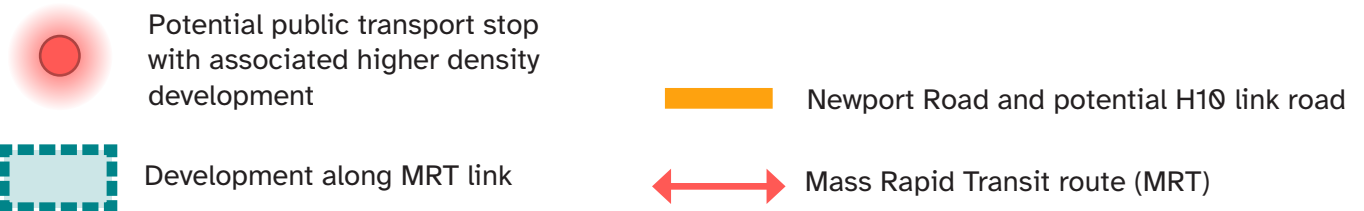
### MKCC Draft Policy GS15 CM



Primary multimodal access point is off Lower End Road via Keightley Gate, which is assumed would be delivered as a grid road given its primary status on CM. If so, c.60m width of grid road will limit delivery of efficient and meaningful development parcel in north of draft allocation, and will also carve the District Park in two.

Secondary multimodal access point off Newport Road links with South East Milton Keynes allocation extending H10 east into Central Bedfordshire.

Only public transport stop identified on CM is at local centre at heart of main development area in east of draft allocation. However, this is located away from proposed MRT route linking Keightley Gate to relocated Woburn Sands train station, therefore missing opportunity of maximising development focussed along public transport that achieves greater modal shift.



**Consortium 2025 Masterplan**



Primary multimodal access point located off Newport Road linking with South East Milton Keynes allocation, extending the road system east through allocation towards Central Bedfordshire.

Secondary access point is for public transport only (including MRT and Redway) linking with Keightley Gate to north-west. This approach allows for development to be delivered within north-west of draft allocation close to public transport stop. As route is essentially a busway and cycle route, development can be closer to road delivering a more efficient layout with greater surveillance for users of links that encourages modal shift.

A second public transport stop is located at the local centre for Wavendon Park Village off Cranfield Road where higher density development can be achieved.

# Conclusion

MK draft policy GS15 CM over-delivers GI associated with the District Park. This is in response to MK's heritage assessment, which over plays the sensitivity of the setting to the local heritage assets, as outlined in Pegasus' representations submitted alongside this document. The consequences of this approach to the concept masterplan are:

- Integrated green and blue infrastructure missing across the draft allocation that would deliver a network of green spaces for people and nature. Additional future GI, without reducing size of District Park, to achieve an integrated GI approach will potentially reduce developable area and increase density required in order to achieve 2,250 homes.
- Large District Park encourages sprawl of Woburn Sands north of the railway line, losing local distinctiveness and character of linear settlement pattern.
- No consideration of potential primary road or MRT alignment, a significant constraint for the draft allocation in terms of developable area, and associated implications to the District Park function.
- Draft allocation is supposed to deliver a development that achieves greater modal shift due to being located along the MRT route. However, size of District Park limits amount of sustainably located development in the north-west of the draft allocation, severely hampering MK's vision.

The Consortium's 2025 Masterplan provides an alternative approach to delivering the draft policy requirements of GS15 which broadly delivers an equivalent area for residential, education, local centre and green space. It is strongly requested that given the evidence provided in Pegasus' representations regarding heritage, and the design advantages outlined in this document, that the CM is amended to reflect the Consortium's 2025 Masterplan arrangement in relation to the District Park.



Area considered for Secondary School

District Park

Wavendon House

Lower End Road

MRT route

Cranfield Road

Primary Road

Newport Road

Local Centre

Primary School



LDĀDESIGN

# Heritage Note on MKCC Heritage Impact Assessment and the Concept Masterplan

## Former Wavendon Golf Course

Redrow Homes, Davidsons Developments Ltd and Storey  
Homes (the 'Consortium')

Date: 17/12/2025

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## 1. Introduction

- 1.1. This note responds to the MK City Plan 2050 Regulation 19 Version and its evidence base, specifically the MKCC *Heritage Impact Assessment for Land East of Wavendon* dated Oct 2025 and Concept Masterplan.
- 1.2. This note has been informed by the preparation of a note on significance and setting which was previously submitted to MKCC, which was informed by a site visit and reference to designation descriptions and documentary sources.

## 2. MKCC Heritage Impact Assessment – Background

- 2.1. The MKCC Heritage Impact Assessment (HIA) sets out a *History of the Wavendon House Estate* and a list of *Heritage Assets within the site and Surrounding Area*, which we concur with.
- 2.2. However, instead of then setting out setting and significance for individual or groups of assets, the HIA gives statements of *Significance of Heritage Assets and Key Relationships and Sensitivity to New Development*. This focusses on the group value of the assets which, whilst a consideration, must be grounded in consideration of intrinsic individual significance to give an appropriate foundation to a consideration of their sensitivity to development. Our assessments of such, as provided in our previous note, are given at Appendix 1.
- 2.3. We agree that, as stated in the MKCC HIA, Wavendon House was of a lesser order of larger estates, with designed grounds *without* sweeping views of the house, and with the lakes placed in close proximity to the house. This is reflected in the extent of the designated area of Registered Park and Garden, which is the relatively small area in proximity to the house, rather than the extent of much-changed wider grounds.
- 2.4. We also agree that the wider parkland beyond the tightly drawn Registered Park and Garden designation has been modified in its former use as a golf course, and that this has harmed the ability to perceive the previous parkland configuration (paragraph 5.10). However, we would not agree that there are '*importantly, views from the registered park and garden across the wider park*', as the park and garden is partially enclosed by vegetation within and around it, including a large hedge mentioned in the Registration Description, and the glimpsed views which are possible are foreshortened by numerous strong bands of vegetation flanking the fairways of the former golf course.
- 2.5. We agree that some areas of parkland around Park Farm have not been altered by the former golf course, but note that these are limited to those areas to the immediate south of the complex (Plate 1, green arrow), as the area to the west was not parkland historically (Plate 1, orange arrow, also as compared to Plate 2), and the area to the north-east of the complex has been cleared of the scattered tree planting that was there historically for use as an open field (Plate 1, red arrow, as compared to Plate 2).



Plate 1 Area around Park Farm

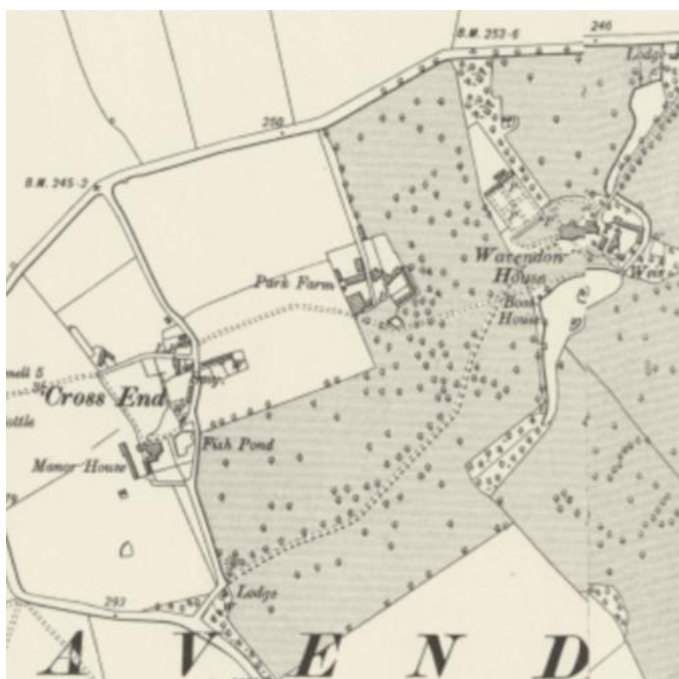


Plate 2 Late 19<sup>th</sup>-century Ordnance Survey map, showing extent of parkland (shaded grey)

- 2.6. We also note that with regards to the former parkland stated in the HIA to be not altered by the former golf course, to the east of Wavendon Park Drive this has been much altered through the clearance of trees, and that the areas to the south of the former golf course were not parkland historically or are now largely cleared of trees and little legible as former parkland.

- 2.7. Whilst we would agree that the former golf course area is quiet and not intruded upon by urban development, it is intrinsically greatly changed by development, with defined fairways and legibly modern planting.

### 3. Heritage Impact Assessment – Sensitivity and the Concept Masterplan

Figure 2. Constraints and Opportunities-Led Indicative Concept Plan for the East of Wavendon Strategic City Extension

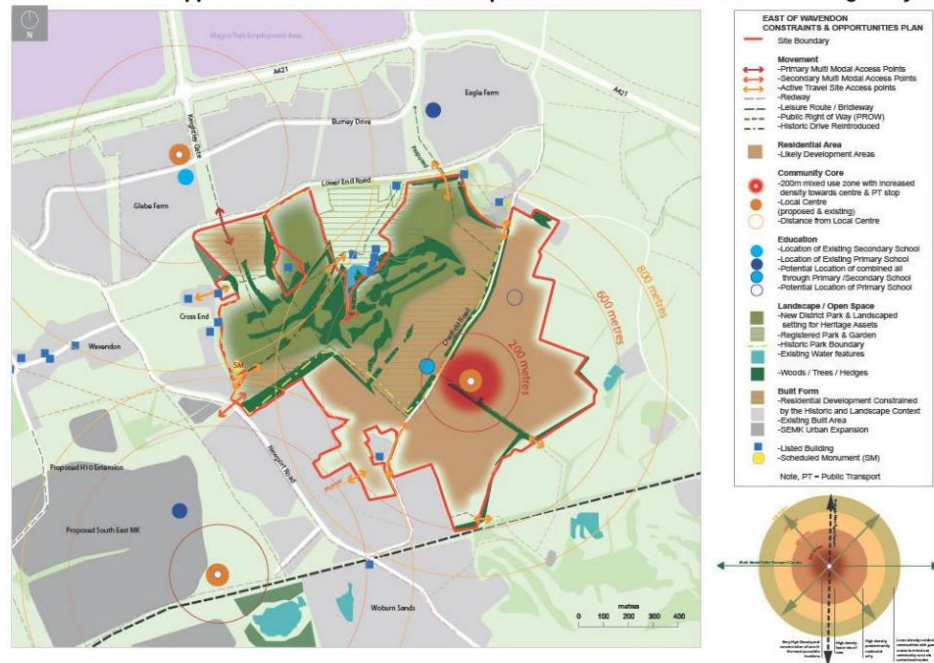


Plate 3 The Concept Masterplan from MK Regulation 19 Plan

- 3.1. As an overarching point, we consider that the extent of the retention of the defunct golf course in the Concept Masterplan is unnecessary and illogical if the existing baseline conditions are taken into account. The character of this area has been so greatly altered that it plainly reads as a former golf course today, and the bands of planting occlude wider views.
- 3.2. The south-western and south-eastern areas of the former golf course could accommodate a greater quantum of residential development with minimal differences in harm to heritage assets, as these areas are mostly visually separated from the significant asset groups by vegetation. Smaller but appropriately placed and landscaped set backs could achieve similar conservation of heritage significance, and as such, the Concept Masterplan does not make best use of the land of the allocation.
- 3.3. With regards to the section of the MKCC HIA on the sensitivity of assets to new development, this section discusses assets or groups of assets, and our comments on each are given below.
- 3.4. With regards to the discussion of the sensitivity of Wavendon House, there is a great emphasis on the south-western drive through the parkland, but this is no longer a vehicular

access to the house, the flats within which are accessed from the north. The experience of this route is also very greatly altered, with the area which it traverses being of golf course character today. The visually obstructive planting of the former golf course also disrupts the relationship between the house and such associated assets as the lodges.

- 3.5. The benefit of the establishment of a district park as wider setting of the heritage assets is concurred with, but the proposed development must be judged against the baseline conditions of the former golf course with visually obstructive planting, rather than against the future *enhancement* of a district park. Taking into account the baseline, comparable impacts and enhancements would result from smaller areas of public open space in key locations, as set out in the masterplan provided in the LDC Design Vision Document (Plate 4).



*Plate 4 Masterplan from LDA Design Vision Document*

- 3.6. The LDA Design Masterplan appropriately conserves the heritage significance of the assets through:

- Preserving the line of the south-western drive
- Preserving the most important views to and from heritage assets
- Giving appropriate setbacks of built form from heritage assets
- Providing appropriate district park wider settings of assets.

- 3.7. However, the LDA masterplan **does not** extend the district park beyond key areas of setting, into areas which are currently visually separated from the assets and which currently contribute minimal amounts to the significance of the assets through setting.
- 3.8. Also, we do not agree that the extent of the former golf course demarcates the extent of the former parkland, as it includes areas which were farmland historically, and does not cover the whole extent of the wider parkland, as shown by comparison of the mapping below (Plate 5) against the modern aerial photograph (Plate 6).

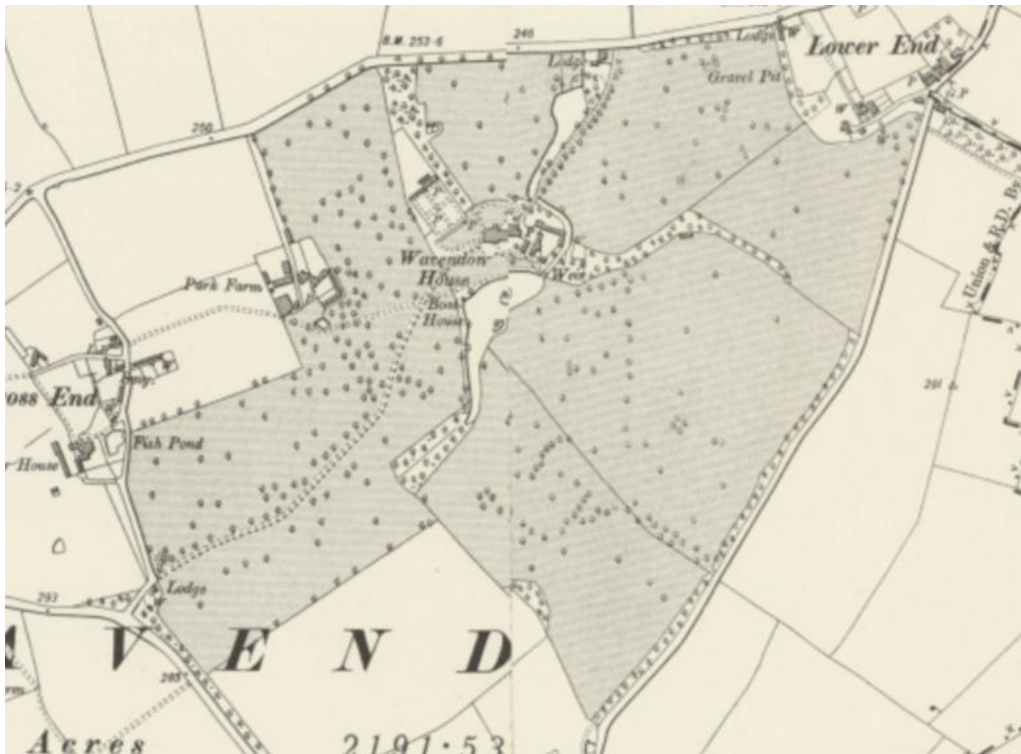


Plate 5 Late 19<sup>th</sup>-century extent of parkland



*Plate 6 Modern aerial photograph*

- 3.9. With regards to the discussion of the *Parkland and Green Spaces*, whilst we agree that the areas of 'original wider parkland' are part of the setting of the Registered Park and Garden, we would stress the change of character of the wider parkland, and as such do not agree that all areas visible from the southern driveway are particularly sensitive to change.
- 3.10. With regards to Cross End, the assessment of sensitivity focusses on the non-designated 3-9 Cross End and the context of that terrace, before concluding on the sensitivity of the group of assets as a whole. We consider that a more detailed consideration of individual assets is necessary, as the Listed buildings of the group, including Cross End Cottage, Wavendon Manor and Manor Cottage, all have much more secluded settings, with significant visual separation from the proposed development area.

## **4. Opportunities for Enhancement**

- 4.1. With regards to the section on *Opportunities for Enhancement*, whilst the possibility of the creation of a Conservation Area at Wavendon House is noted, Section 69 of the 1990 Act is clear that such areas should be defined on the basis of being areas of special architectural and historic interest, the character or appearance of which it is desirable to preserve or enhance. The Listed buildings and Registered Park and Garden would represent such areas of historic interest, as could the area of surviving parkland immediately south of Park Farm. However, the greatly changed former golf course would not represent such an area, and the designation of that area as a Conservation Area is not considered to be appropriate.



- 4.2. Furthermore, any designation of a Conservation Area would have to be informed by appropriate assessment and be subject to consultation, which has not yet taken place. As such, no weight should be given to the mention of the possibility of such a designation of an uncertain area with no suggested timeframe for designation, even if it were considered to be warranted through heritage significance, which it is not.
- 4.3. Whilst we agree that the establishment of a district park through removal of former golf course planting would be an enhancement, it is important to note that the discussion of this in the HIA recognises that the former golf course planting is detrimental. The presence of the detrimental former golf course is the appropriate baseline condition to consider the allocation against.
- 4.4. With regards to the enhancements set out in the HIA, we consider that comparable enhancements could be delivered in parallel to a greater quantum of residential development, with a smaller areas of strategic public open space, as presented in the LDA Masterplan.
- 4.5. With regards to further research into the Scheduled Ancient Monument, it must be recognised that it is not possible to date some monuments without interventions that would greatly impact upon them and for which Scheduled Monument Consent would be unlikely to be granted. The analysis presented in our previous note (Appendix 1 below) indicates that due to its physical relationship with ridge and furrow earthworks, in its latest form, it clearly post-dates those earthworks, strongly suggesting an origin or reworking as a windmill mound, although the recovery of medieval pottery may indicate its origin as a motte.
- 4.6. With regards to the Summary, I note that the area close to the Scheduled Monument is considered to be of high sensitivity, although no assessment of the sensitivity of the asset is presented in the preceding sections.

## 5. Conclusions

- 5.1. In conclusion, considering the HIA and the Concept Masterplan together, it is considered that the consideration of the baseline does not take enough account of the greatly changed nature of the areas which are former golf course, including the visually obstructive belts of planting, and that development of a greater quantum could be delivered with similar levels of harm to that which would occur through the Concept Masterplan, with smaller strategically placed areas of public open space.

## 6. Appendix 1: Our Notes of Significance and Setting

### Scheduled 'Motte'

- 6.1. This monument lies within the south-western area of the site (Plate 7).



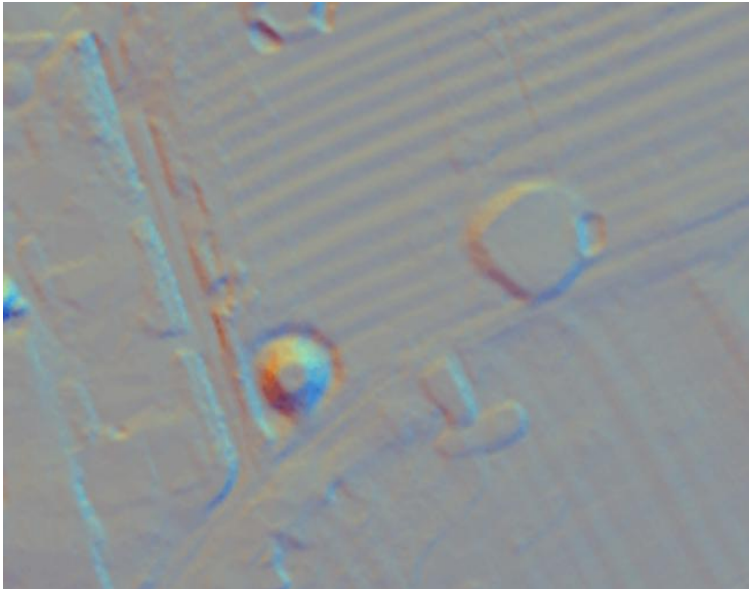
- 6.2.

*Plate 7 Looking south-west towards the Scheduled Monument*

- 6.3. This was Scheduled in 1933, with the following description dating to 1993:

*The monument includes a small well defined motte castle situated on the flat top of a low hill. The motte is slightly oval, orientated north-west to south-east with dimensions of 26m by 22m. It rises to a flat summit at 3.4m with the sides of the mound eroded to give a terraced appearance. Surrounding the motte is a shallow dry ditch 5m wide and 0.9m deep, from which material was quarried during the construction of the mound. The ditch is continuous around all but the south-east quarter where it is crossed by a causewayed ramp which rises to the mound summit. Partial excavation of the site in 1963 revealed no evidence of any building on the summit of the mound with finds of pottery limited to the 13th century. The site is therefore believed to have been occupied for a short duration only and possibly represents an adulterine castle site built during the reign of Stephen. The modern structures built on the mound, including those associated with golf, are excluded from the scheduling although the ground beneath them is included.*

- 6.4. Whilst the monument was Scheduled as a motte, possibly representing an adulterine castle from the reign of Stephen, it has also been previously interpreted as a mill mound.
- 6.5. LiDAR data appears to suggest an origin for the mound that **post-dates** the surrounding medieval ridge and furrow earthworks (Plate 8, with the probable medieval ridge and furrow earthworks not appearing to respect the scheduled earthwork in layout).



*Plate 8 LiDAR data of the Scheduled Earthwork*

- 6.6. As such, a mill mound interpretation appears more probable. Alternatively, the surviving remains may represent a later comprehensive reworking of a motte mound for this purpose, as some medieval pottery is said to have been recovered from the site during excavations in the 1960s.
- 6.7. There are no clear lines of sight to contemporary assets, or historic associations in the surrounding landscape relating to the siting of any potential adurturine castle or mill mound. Neither are views from the asset today illustrative of any notable topographic context of the feature.
- 6.8. The monument is now in a former golf course context (Plate 9, Plate 10). The context of the monument now comprises golf course planting, in addition to the settlement to the west.



*Plate 9 Looking east from the Scheduled mound*



*Plate 10 Looking north from the Scheduled mound*

- 6.9. As a Scheduled Monument, the mound is a designated heritage asset of the highest level of significance, as defined by the NPPF. Whether a motte, mill mound or combination of the two,

the heritage significance of the asset is likely to be mainly embodied in the physical fabric of the monument, which has archaeological and historic illustrative value.

- 6.10. Setting contributes, but to a lesser degree. The element of the setting of the asset that contributes to its significance is considered to comprise the open nature of the immediate vicinity of the mound, from where it can be appreciated and understood.
- 6.11. The development offers an opportunity for access and interpretation to the monument.
- 6.12. With an appropriate set back of development, the site can accommodate development in its vicinity as there are no lines of sight to or from the asset or other associations which need preservation. Any harm would be minimal.



*Plate 11 Updated masterplan for development in vicinity of Scheduled Monument*

## Park Farmhouse

- 6.13. Park Farmhouse is a Grade II Listed farmhouse of early 19<sup>th</sup>-century date with a 17<sup>th</sup>-century rear block (Plate 12).

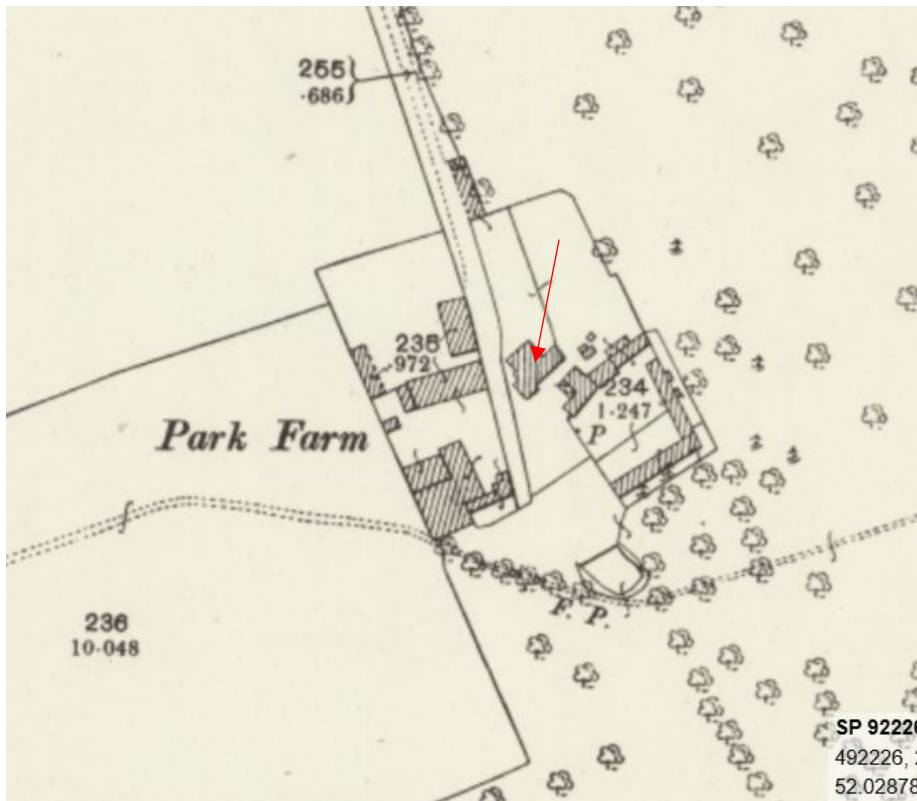


Plate 12 Looking north to Park Farmhouse

- 6.14. Park Farmhouse was Listed in 1984, with the following description:

*House. Early C19 with early C17 rear block. Painted brick, slate roof with end stacks. Moulded wood eaves cornice. Rear block timber-framed with brick infill and additions each end, front painted roughcast. Old tiled roof, central brick chimney and later chimney to W.bay. 2 storeys. Most windows have margin glazing. N.elevation has 2 bays of 2-light casements with painted lintels. Gables have bargeboards and finials. W.elevation has 2-storied gabled porch to right with half-glazed flush-panel door with rectangular fanlight and stucco doorcase of panelled pilasters and frieze with cornice. S elevation of rear block has small C18 projecting wing to left with sash window to each floor, central flush-panel door in moulded architrave frame, two 2-light casements to left, modern 3-light casement to right, later bay to right with door and a 2-light casement with segmental arch, four 2-light casements to first floor. N. elevation of rear wing has 2 bays of 2-light casements. E.gable of main block has flush-panel door, upper panel glazed, with margin-glazed fanlight and 1-light upper sash. Interior has entrance hall with 2 openings in S.wall with heavy arch features, staircase with scrolled tread-ends and rope-mould to soffit, square newels and balusters and slender handrail curved round wall at upper landings. Front rooms have moulded cornice and 2 marble fireplaces. Rear block has exposed timber framing and heavy chamfered spine beams, inglenook fireplace, original roof structure with queenpost trusses, curved windbraces and coupled rafters.*

- 6.15. Historically, the farmhouse was well enclosed by farm buildings of its associated complex, especially on the western and eastern sides (Plate 13).



*Plate 13 Extract from an Ordnance Survey map of c. 1900*

- 6.16. Today, the farmhouse lies in an area well-enclosed by vegetation, with a garden plot (Plate 14), and pocket of former parkland including pond beyond (Plate 15, Plate 16). A later building lies to the east. These areas lie outside of the site.



*Plate 14 Extract from a modern aerial photograph*



*Plate 15 Looking south-east across the pocket of parkland character south of the asset, beyond the proposed development area*



*Plate 16 Panoramic view from west to east through north, taken to the south of Park Farmhouse*

- 6.17. The wider former parkland surrounds are much altered by the former golf course. There is little intervisibility between the farmhouse and this wider area (Plate 17 to Plate 19).



*Plate 17 Looking east towards Park Farmhouse from within the site*



*Plate 18 Looking north towards Park Farmhouse from within the site*



*Plate 19 Looking west towards Park Farmhouse from within the site*



- 6.18. The Tithe Map for Wavendon of 1840 suggests that the farm was held in hand as part of the Wavendon House land holdings, with no separate tenancy.
- 6.19. As a Grade II Listed building, Park Farmhouse is a designated heritage asset of a lesser level of significance, as defined by the NPPF. The significance of the asset is primarily derived from the physical fabric of its built form, which has architectural, artistic and historic interests.
- 6.20. Setting contributes to its significance, but to a lesser degree than its fabric. The primary elements of the setting of the asset which contribute to its significance comprise:
- Its garden area and immediate curtilage, from where the asset is best appreciated.
  - Its remaining formerly associated farm building, which give legibility to its agricultural origins.
  - Wavendon House.
  - The historic landholding of Wavendon House, which the farm was part of, particularly the area to the south of the farmhouse which retains a parkland character and has clear intervisibility with the asset.
- 6.21. The site lies in the wider surrounds of the asset which was formerly broadly associated parkland, but now has a changed character. This makes a minor contribution to the significance of the asset through setting, retaining an overall undeveloped nature, but much altered in intrinsic character and largely screened from the asset by intervening vegetation.
- 6.22. As such, the wider site has capacity to accommodate development without causing significant harm to the heritage significance of Park Farmhouse through changes in setting.
- 6.23. The masterplan has been adjusted to pull back the footprint of development to the south of Park Farmhouse, to avoid the intrusion of development in views south from the asset beyond the surviving pocket of parkland and the boundary vegetation enclosing that area (Plate 20). Development in line with the revised masterplan would be anticipated to cause less than substantial harm at the lower end of that spectrum to Park Farmhouse.



*Plate 20 Extract from the updated masterplan*

## Wavendon House Listed Buildings and Registered Park and Garden, and wider former parkland area

- 6.24. Wavendon House is a Grade II\* 17<sup>th</sup>- and early 18<sup>th</sup>-century house, enlarged in the late 18<sup>th</sup> century (Plate 21). The complex also includes Grade II Listed Bridges, Coach House, Stables and Lodge. It lies within the Grade II Listed Wavendon House Landscape Park and Garden.
- 6.25. Of these assets, the settings of Wavendon House Listed Building and the Registered Park and Garden are considered to be relevant to the emerging masterplan. The other assets are subservient to the house and park and garden, and whilst full assessments of their significance and setting would be provided as part of a planning application, the contribution of the wider landscape to their setting can be proportionately considered as part of a consideration of the house and gardens.



Plate 21 Looking north-west to Wavendon House

- 6.26. Wavendon House was Listed in 1984, with the following reasons given for designation.

*Country House, late C17 reconstructed c.1703 for James Selby, enlarged 1798 for Henry Hoare, Painted brick and stucco. Hipped slate roofs. 2 storeys and cellars. S.elevation has plinth, ground and 1st floor cill bands, plain cornice and parapet. Central block c.1703 altered 1798 has 6 bays, sash windows with moulded architraves; to LH a Greek Doric porch with 4 plain columns, 2 storey canted bay window to RH of this. To LH wing of 1798, 3 windows in a balancing 2 storey canted bay. To RH is a lower painted brick service wing C18 with hipped slate roof and dentil brick cornice. 3 central bays slightly projecting with pediment over, W. elevation of 1798 wing has 5 bays and central semi-circular arched door. N. elevation of central block has moulded cornice, central pediment, and early C19 half octagon to 1 storey*



*in centre of ground floor. Small Game Store projecting from service wing built up on brick arches with slate roof.*

6.27. As such, much of what is seen today, comprising the south-facing stucco building, is of late 18<sup>th</sup>-century date.

6.28. The Park and Garden was Grade II Registered in 2019, with the following reasons for designation given:

*Wavendon House landscape, laid out in 1768-1772 by Richard Woods, with later C18 and C19 additions and alterations, is registered at Grade II for the following principal reasons:*

*Design interest:*

*\* pleasure grounds and park laid out by a significant C18 surveyor and improver, reflecting the taste of the period, and transforming the setting of a house by the skilful use of water; \* the substantial survival and legibility of a Woodsian scheme that on other sites tend to be incomplete or overlain by subsequent remodelling; \* the evolution of the design in the late C18 and C19, and early C20 improvements to the walled garden;*

*\* presence of a large walled garden in close proximity to the principal mansion.*

*Historic interest:*

*\* enhancement of an estate within fashionable reach of London, and where the house was then remodelled by the influential Hoare family; \* C18 patronage, where Woods, a Catholic, worked for both Catholic and Protestant employers.*

*Group value:*

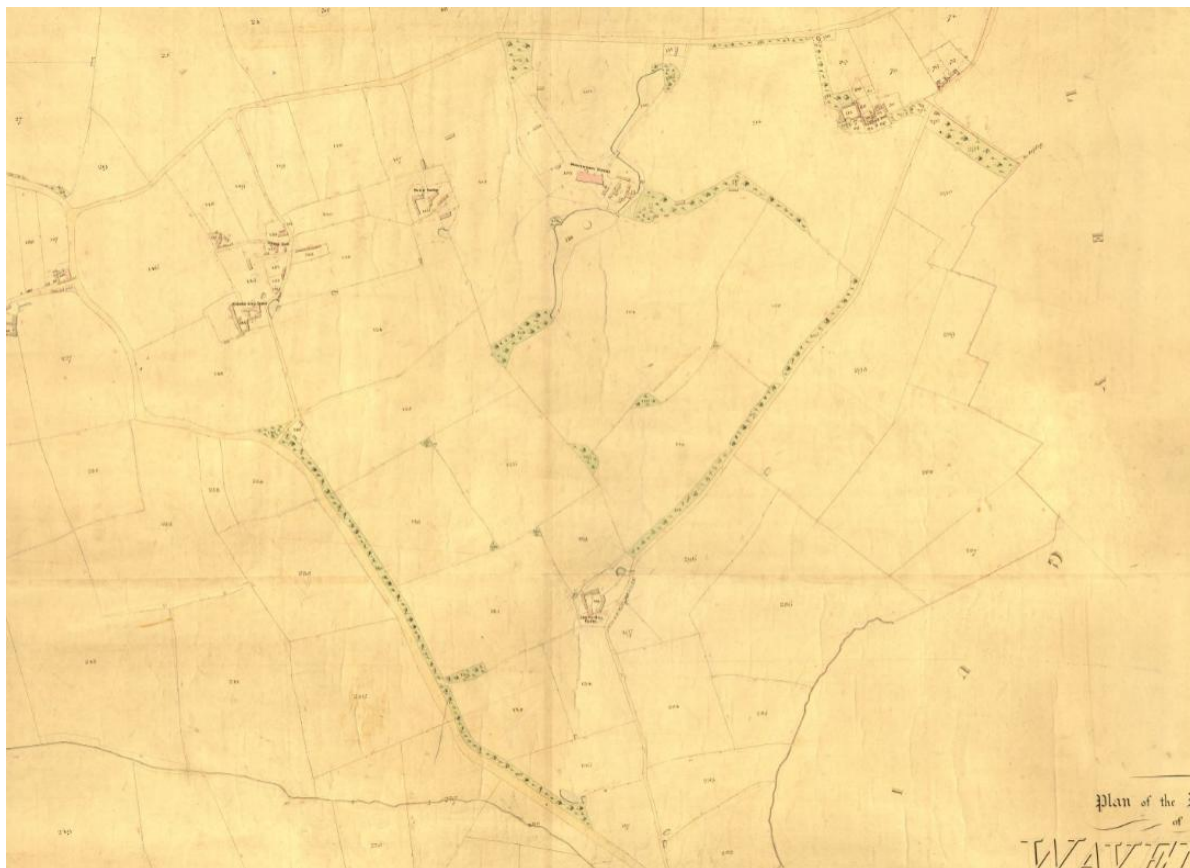
*\* with the Grade II\*- listed house, and Grade II-listed former stables, coach house and lodge, and where Woods' ornamental bridges are also listed at Grade II.*

6.29. There are no surviving plans of the Woods scheme, but contemporary accounts record that the lakes were Woods' work. The lakes are linked by a canal and crossed by bridges and a cascade. Woods is known to have worked at Wavendon between 1768 and 1772.



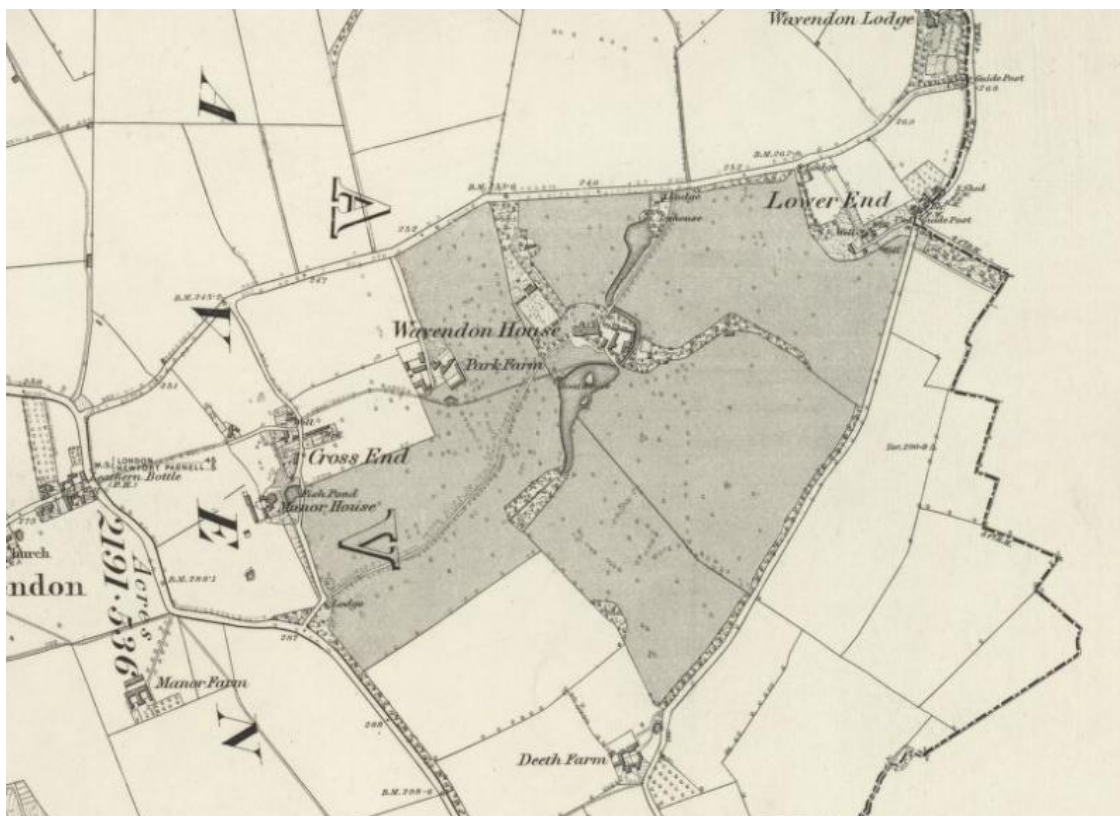
*Plate 22 Looking south towards the lake from close to the house*

- 6.30. Woods was a contemporary of Brown, but Woods' landscapes were on a smaller more intricate scale. In Woods' schemes, the boundaries between the pleasure grounds and parklands was often blurred, and Woods' landscapes often had a closer visual relationship between the house, walled gardens and service buildings, as can be seen at Wavendon.
- 6.31. In the late 18<sup>th</sup> century, after Woods's work, the orientation of the house was reversed to face south across the lake, having previously faced north.
- 6.32. The overall arrangement of the grounds as present in the mid 19<sup>th</sup> century is shown on the Wavendon Tithe Map of 1840 (Plate 23).



*Plate 23 Extract from the Wavendon Tithe Map of 1840*

- 6.33. The large field to the south-east of the southern lake has the field name *The Park* in 1840. The extent of the parkland beyond this area at that time is not known. Later mapping of 1880 clearly depicts the extent of the parkland, and shows that it did not clearly correlate with the land broadly within tree belts depicted on earlier mapping (Plate 24).



*Plate 24 Extract from the Ordnance Survey mapping of 1880*

- 6.34. As such, whilst the date of the wider parkland beyond the area which is Registered is not precisely known, the area historically present to the south-east of the southern lake was present by 1840, and the north-eastern area and western areas were present by 1880.
- 6.35. However, these wider areas have been subject to a large degree of later change, with all of the southern areas now having a former golf course character (Plate 25).



*Plate 25 Modern aerial photograph showing the former parkland which has since been a golf course*

- 6.36. There is a large hedge to the south-east of the lake (Plate 25), which is mentioned in Registration description.
- 6.37. The land to the south-east of the assets within the site is very largely screened from them. There are only glimpses from Wavendon House and Registered Park and Garden through to wider land to the south-east (reciprocal views given at Plate 26 and Plate 27), and these are to the very-much-changed land of the former golf course.



*Plate 26 Looking north towards Wavendon House*



*Plate 27 Looking north-west to Wavendon House*



- 6.38. As a Grade II\* Listed building, Wavendon House is a designated heritage asset of the highest level of significance, as defined in the NPPF. Its significance is primarily embodied in its physical fabric, which has architectural, artistic and historic interests.
- 6.39. Setting also contributes, but to a lesser degree. The primary elements of the setting of the asset which contribute to its heritage significance comprise:
- The immediate curtilage of the house, from where it can be appreciated and understood.
  - The ancillary buildings, including the stables and coach house, which have historic illustrative value as to the high status of the building historically.
  - The Registered Park and Garden and associated structures, which add to the artistic value of the house, and have historic illustrative value as to its high status.
  - The wider areas of parkland which retain their character, which have historic illustrative value.
- 6.40. The site lies beyond these areas. It includes areas of former parkland which have had their character greatly changed by the laying out of the former golf course, and with which the house only has very limited intervisibility, although the house and the site are experienced together in dynamic views through the wider area. The site makes a minor contribution to the significance of the asset through setting.
- 6.41. As a Grade II Registered Park and Garden, the Wavendon House Landscape is a designated heritage asset of less than the highest level of significance, as defined by the NPPF. Its significance is primarily embodied in the water features, planting structures and spaces within its bounds, which have artistic and historic illustrative interests.
- 6.42. Setting contributes, but to a lesser degree. The primary elements of the setting of the asset which contribute to its heritage significance comprise:
- Wavendon House, which the grounds were laid out around, and the ancillary buildings.
  - The wider areas of parkland which retain their character, which have historic illustrative value as to the later development of the wider landscape.
- 6.43. The site lies beyond these areas, but includes former parkland which now has a former golf course character. The site has limited intervisibility with the asset, although it is visible in dynamic views through the wider area. The site makes a minor contribution to the significance of the asset through setting.
- 6.44. As such, the site has the capacity to accommodate development without causing significant harm to the Listed Wavendon House or the Registered Wavendon House Landscape.
- 6.45. The masterplan has been adjusted with enhanced screening on north-western edge and rounding off of previously proposed built form (Plate 28). Development in line with the masterplan would cause less than substantial harm at the lower end of the spectrum to the house and landscape.



*Plate 28 Adjusted masterplan showing area to the south of the Registered Park and Garden*

- 6.46. The wider parkland which now has a former golf course character is not considered to be a non-designated heritage asset in its own right, but rather should be considered as part of the setting of the assets discussed above.

## Cross End Cottage

- 6.47. Listed buildings at Cross End are generally well screened from the site by roadside vegetation. There is some intervisibility of the site with Cross End Cottage, a Grade II Listed Thatch Cottage on the eastern side of the village (Plate 29).



*Plate 29 Looking north to Cross End Cottage*

- 6.48. Cross end Cottage was Listed in 1984 with the following description:

*Cottage. C18, possibly earlier. Rendered and painted, thatched roof, half hipped. 2 brick chimneys. 1 storey and attic, south elevation has 4 attic windows, 2 light segmental headed casements carried up into thatch, central door with 3 casements each side to ground floor.*

- 6.49. The Wavendon Tithe Map of 1840 shows the building was then divided into three elements, with the apportionment listing the holding as *House Blacksmith's Shop Barns Yard, Garden and Orchard* (plot 150). It was under the same ownership as Wavendon House, but with a separate tenancy, which also included a garden to the east (plot 121).



*Plate 30 Extract from the Wavendon The Map of 1840*

- 6.50. Today, the asset is a single dwelling located within a domestic curtilage plot, within the settlement of Cross End.
- 6.51. The asset can be appreciated from the road to the south, but land further east is largely screened by roadside vegetation (Plate 31). Some visibility of the upper elements of the asset is possible from the western area of the site, although there is no clear intervisibility (Plate 32).



*Plate 31 Looking north-west close to Cross End Cottage, showing adjacent vegetation*



*Plate 32 Looking north-west towards the roof of Cross End Cottage from within the site*



- 6.52. As a Grade II Listed building, Cross End Cottage is a designated heritage asset of less than the highest level of significance, as defined in the NPPF. The significance of the asset is primarily derived from its physical fabric, which has architectural and historic illustrative values.
- 6.53. Setting contributes but to a lesser degree than the fabric of the asset. The principal elements of the setting of the asset which contributes to its significance comprise:
- The curtilage of the asset, from where it is best appreciated and understood, which reflects the historic curtilage of the asset.
  - The settlement of Cross End, in which the asset was historically located.
  - The road to the south and east, from where the asset can be appreciated.
  - The historic garden area of the asset, which now appears to be in separate ownership.
- 6.54. The site lies beyond these areas, and is largely screened from the asset by roadside vegetation, although there are views to the upper elements of the asset from the wider site, and the site is experienced in dynamic views through the area. It should be noted that the character of the site has largely changed from that which was present historically, now comprising a former golf course. The site is considered to make a very minor contribution to the heritage significance of the asset through setting.
- 6.55. As such, the site can accommodate development without causing significant harm to the asset.
- 6.56. The masterplan has been adjusted to ensure that Cross End retains legibility as a discrete historic settlement area (Plate 33), with open space to the east of Cross End Cottage. It is anticipated that the masterplan could be delivered with only a very minor amount of harm to the heritage significance of Cross End Cottage, comprising less than substantial harm at the low end of the spectrum, at most.



*Plate 33 Adjusted masterplan closest to Cross End*

### **3, 5, 7, and 9 Cross End**

- 6.57. Numbers 3, 5, 7, and 9 Cross End comprise a terrace of cottages on the eastern side of the village, projecting eastwards from the road (Plate 34).



*Plate 34 Looking east to 3, 5, 7, and 9 Cross End*

- 6.58. The cottages are depicted on the Wavendon Tithe Map of 1840 (Plate 35), with the apportionment describing them as Four Cottages, Barns and Gardens.



*Plate 35 Extract from the Wavendon Tithe Map*

- 6.59. No further associated tenancy is shown on the Tithe Apportionment, beyond the garden area to the south.
- 6.60. Today, the cottages appear to have the same associated garden area to the south, which is overlooked by the front facades of the cottages. The rear, north-facing elevation is largely blank (Plate 36).



*Plate 36 Looking south to the rear elevation of 3, 5, 7, and 9 Cross End*

- 6.61. The terrace of cottages is considered to be a non-designated heritage asset. Its significance is primarily embodied in the physical fabric of its built form, which has architectural and historic illustrative interests.
- 6.62. Setting contributes to the significance of the asset, but to a lesser degree. Those elements of setting which contribute comprise:
- The garden area to the south of the terrace.
  - The village of Cross End, which it is sited on the edge of.
  - The open character of the area immediately to the north, albeit definitely to the rear of the asset.
- 6.63. The site includes the field to the rear of the asset. Beyond that area, parts of the western area of the site have intervisibility with the asset, although the character of the site has changed to former golf course. The site was historically under separate tenancy to the row of cottages. The site makes a minor contribution to the significance of the asset, as open land which allows an understanding of the historic extent of the settlement it lies on the edge of (Plate 37, Plate 38).



*Plate 37 Looking north to 3, 5, 7, and 9 Cross End from within the site*



*Plate 38 Looking west to 3, 5, 7, and 9 Cross End from within the site*

6.64. As discussed above, the masterplan has been adjusted to ensure that Cross End retains legibility as a discrete historic settlement area (Plate 39), with open space north, south and east of 3, 5, 7, and 9 Cross End. It is anticipated that the masterplan could be delivered with a minor to moderate amount of harm to the heritage significance of the non-designated heritage asset of 3, 5, 7, and 9, Cross End.



*Plate 39 Adjusted masterplan closest to Cross End*

## Appendix 2: Methodology

### Assessment of Significance

In the *NPPF*, heritage significance is defined as:

***“The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site’s Statement of Outstanding Universal Value forms part of its significance.”***<sup>1</sup>

Historic England’s *GPA:2* gives advice on the assessment of significance as part of the application process. It advises understanding the nature, extent, and level of significance of a heritage asset.<sup>2</sup>

In order to do this, *GPA 2* also advocates considering the four types of heritage value an asset may hold, as identified in English Heritage’s *Conservation Principles*.<sup>3</sup> These essentially cover the heritage ‘interests’ given in the glossaries of the *NPPF* and the *PPG* which are archaeological, architectural and artistic, and historic.<sup>4</sup>

The *PPG* provides further information on the interests it identifies:

- ***Archaeological interest:*** *As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.*
- ***Architectural and artistic interest:*** These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skills, like sculpture.
- ***Historic interest:*** An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation’s history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.<sup>5</sup>

Significance results from a combination of any, some, or all of the interests described above.

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<sup>1</sup> MHCLG, *NPPF*, Annex 2.

<sup>2</sup> Historic England, *GPA:2*.

<sup>3</sup> Historic England, *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment* (London, April 2008). These heritage values are identified as being ‘aesthetic’, ‘communal’, ‘historical’ and ‘evidential’, see *idem* pp. 28–32.

<sup>4</sup> MHCLG, *NPPF*, Annex 2; MHCLG, *PPG*, paragraph 006, reference ID: 18a-006-20190723.

<sup>5</sup> MHCLG, *PPG*, paragraph 006, reference ID: 18a-006-20190723.



Historic England guidance on assessing heritage significance, *HEAN:12*, advises using the terminology of the *NPPF* and *PPG*, and thus it is that terminology which is used in this Report.<sup>6</sup>

Listed Buildings and Conservation Areas are generally designated for their special architectural and historic interest. Scheduling is predominantly, although not exclusively, associated with archaeological interest.

### **Setting and significance**

As defined in the *NPPF*:

***“Significance derives not only from a heritage asset’s physical presence, but also from its setting.”<sup>7</sup>***

Setting is defined as:

***“The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.”<sup>8</sup>***

Therefore, setting can contribute to, affect an appreciation of significance, or be neutral with regards to heritage values.

### **Assessing change through alteration to setting**

How setting might contribute to these values has been assessed within this Report with reference to *GPA:3*, particularly the checklist given on page 11. This advocates the clear articulation of “*what matters and why*”.<sup>9</sup>

In *GPA:3*, a stepped approach is recommended, of which Step 1 is to identify which heritage assets and their settings are affected. Step 2 is to assess whether, how and to what degree settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated. The guidance includes a (non-exhaustive) checklist of elements of the physical surroundings of an asset that might be considered when undertaking the assessment including, among other things: topography, other heritage assets, green space, functional relationships and degree of change over time. It also lists aspects associated with the experience of the asset which might be considered, including: views, intentional intervisibility, tranquillity, sense of enclosure, accessibility, rarity and land use.

Step 3 is to assess the effect of the proposed development on the significance of the asset(s). Step 4 is to explore ways to maximise enhancement and minimise harm. Step 5 is to make and document the decision and monitor outcomes.

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<sup>6</sup> Historic England, *Statements of Heritage Significance: Analysing Significance in Heritage Assets*, Historic England Advice Note 12 (Swindon, October 2019).

<sup>7</sup> MHCLG, *NPPF*, Annex 2.

<sup>8</sup> MHCLG, *NPPF*, Annex 2.

<sup>9</sup> Historic England, *GPA:3*, pp. 8, 11.



A Court of Appeal judgement has confirmed that whilst issues of visibility are important when assessing setting, visibility does not necessarily confer a contribution to significance and factors other than visibility should also be considered, with Lindblom LJ stating at paragraphs 25 and 26 of the judgement (referring to an earlier Court of Appeal judgement):

*Paragraph 25 – “But – again in the particular context of visual effects – I said that if “a proposed development is to affect the setting of a listed building there must be a distinct visual relationship of some kind between the two – a visual relationship which is more than remote or ephemeral, and which in some way bears on one’s experience of the listed building in its surrounding landscape or townscape” (paragraph 56)”.*

*Paragraph 26 – “This does not mean, however, that factors other than the visual and physical must be ignored when a decision-maker is considering the extent of a listed building’s setting. Generally, of course, the decision-maker will be concentrating on visual and physical considerations, as in Williams (see also, for example, the first instance judgment in R. (on the application of Miller) v North Yorkshire County Council [2009] EWHC 2172 (Admin), at paragraph 89). But it is clear from the relevant national policy and guidance to which I have referred, in particular the guidance in paragraph 18a-013-20140306 of the PPG, that the Government recognizes the potential relevance of other considerations – economic, social and historical. These other considerations may include, for example, “the historic relationship between places”. Historic England’s advice in GPA3 was broadly to the same effect.”<sup>10</sup>*

## Levels of significance

Descriptions of significance will naturally anticipate the ways in which impacts will be considered. Hence descriptions of the significance of Conservation Areas will make reference to their special interest and character and appearance, and the significance of Listed Buildings will be discussed with reference to the building, its setting and any features of special architectural or historic interest which it possesses.

In accordance with the levels of significance articulated in the *NPPF* and the *PPG*, three levels of significance are identified:

- **Designated heritage assets of the highest significance**, as identified in paragraph 213 of the *NPPF*, comprising Grade I and II\* Listed Buildings, Grade I and II\* Registered Parks and Gardens, Scheduled Monuments, Protected Wreck Sites, World Heritage Sites and Registered Battlefields (and also including some Conservation Areas) and non-designated heritage assets of archaeological interest which are demonstrably of equivalent significance to Scheduled Monuments, as identified in footnote 75 of the *NPPF*;<sup>11</sup>

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<sup>10</sup> Catesby Estates Ltd. V. Steer [2018] EWCA Civ 1697, paras. 25 and 26.

<sup>11</sup> MHCLG, *NPPF*, para. 213 and fn. 75.



- **Designated heritage assets of less than the highest significance**, as identified in paragraph 213 of the NPPF, comprising Grade II Listed Buildings and Grade II Registered Parks and Gardens (and also some Conservation Areas);<sup>12</sup> and
- **Non-designated heritage assets.** Non-designated heritage assets are defined within the PPG as *“buildings, monuments, sites, places, areas or landscapes identified by planning bodies as having a degree of significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets”*.<sup>13</sup>

Additionally, it is of course possible that sites, buildings or areas have no heritage significance.

### Assessment of harm

Assessment of any harm will be articulated in terms of the policy and law that the proposed development will be assessed against, such as whether a proposed development preserves or enhances the character or appearance of a Conservation Area, and articulating the scale of any harm in order to inform a balanced judgement/weighting exercise as required by the NPPF.

In accordance with key policy, the following levels of harm may potentially be identified for designated heritage assets:

- **Substantial harm or total loss.** It has been clarified in a High Court Judgement of 2013 that this would be harm that would *“have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced”*;<sup>14</sup> and
- **Less than substantial harm.** Harm of a lesser level than that defined above.

With regards to these two categories, the PPG states:

***“Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.”***<sup>15</sup>

Hence, for example, harm that is less than substantial would be further described with reference to where it lies on that spectrum or scale of harm, for example low end, middle, and upper end of the less than substantial harm spectrum/scale.

With regards to non-designated heritage assets, there is no basis in policy for describing harm to them as substantial or less than substantial, rather the NPPF requires that the scale of any harm or loss is articulated whilst having regard to the significance of the asset. Harm to such assets is therefore articulated as a level of harm to their overall significance, using descriptors such as minor, moderate and major harm.

It is also possible that development proposals will cause no harm or preserve the significance of heritage assets. Here, a High Court Judgement of 2014 is relevant. This concluded that with regard to

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<sup>12</sup> MHCLG, NPPF, para. 213.

<sup>13</sup> MHCLG, PPG, paragraph O39, reference ID: 18a-039-20190723.

<sup>14</sup> Bedford Borough Council v Secretary of State for Communities and Local Government [2013] EWHC 2847 (Admin), para. 25.

<sup>15</sup> MHCLG, PPG, paragraph O18, reference ID: 18a-018-20190723.



preserving the setting of a Listed building or preserving the character and appearance of a Conservation Area, "preserving" means doing "no harm".<sup>16</sup>

Preservation does not mean no change, it specifically means no harm. *GPA:2* states that "Change to heritage assets is inevitable but it is only harmful when significance is damaged".<sup>17</sup> Thus, change is accepted in Historic England's guidance as part of the evolution of the landscape and environment. It is whether such change is neutral, harmful or beneficial to the significance of an asset that matters.

As part of this, setting may be a key consideration. When evaluating any harm to significance through changes to setting, this Report follows the methodology given in *GPA:3*, described above. Fundamental to this methodology is a consideration of "what matters and why".<sup>18</sup> Of particular relevance is the checklist given on page 13 of *GPA:3*.<sup>19</sup>

It should be noted that this key document also states:

***"Setting is not itself a heritage asset, nor a heritage designation..."***<sup>20</sup>

Hence any impacts are described in terms of how they affect the significance of a heritage asset, and heritage interests that contribute to this significance, through changes to setting.

With regards to changes in setting, *GPA:3* states that:

***"Conserving or enhancing heritage assets by taking their settings into account need not prevent change".***<sup>21</sup>

Additionally, whilst the statutory duty requires that special regard should be paid to the desirability of not harming the setting of a Listed Building, that cannot mean that any harm, however minor, would necessarily require Planning Permission to be refused. This point has been clarified in the Court of Appeal.<sup>22</sup>

## **Benefits**

Proposed development may also result in benefits to heritage assets, and these are articulated in terms of how they enhance the heritage interests, and hence the significance, of the assets concerned.

The *NPPF* (at Paragraphs 214 and 215) requires harm to a designated heritage asset to be weighed against the public benefits of the development proposals.<sup>23</sup>

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<sup>16</sup> R (Forge Field Society) v Sevenoaks District Council [2014] EWHC 1895 (Admin).

<sup>17</sup> Historic England, *GPA:2*, p. 9. CD 9.4

<sup>18</sup> Historic England, *GPA:3*, p. 8. CD 9.5

<sup>19</sup> Historic England, *GPA:3*, p. 13. CD 9.5

<sup>20</sup> Historic England, *GPA:3*, p. 4. CD 9.5

<sup>21</sup> Historic England, *GPA 3*, p. 8. CD 9.5

<sup>22</sup> Palmer v Herefordshire Council & Anor [2016] EWCA Civ 1061. CD 10.9

<sup>23</sup> MHCLG, *NPPF*, paras. 214 and 215.



Recent High Court Decisions have confirmed that enhancement to the historic environment should be considered as a public benefit under the provisions of Paragraphs 214 to 216.<sup>24</sup>

The PPG provides further clarity on what is meant by the term 'public benefit', including how these may be derived from enhancement to the historic environment ('heritage benefits'), as follows:

***“Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit.***

***Examples of heritage benefits may include:***

- ***sustaining or enhancing the significance of a heritage asset and the contribution of its setting***
- ***reducing or removing risks to a heritage asset***
- ***securing the optimum viable use of a heritage asset in support of its long term conservation.”<sup>25</sup>***

Any "heritage benefits" arising from the proposed development, in line with the narrative above, will be clearly articulated in order for them to be taken into account

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<sup>24</sup> Including – Kay, R (on the application of) v Secretary of State for Housing Communities and Local Government & Anor [2020] EWHC 2292 (Admin); MHCLG, NPPF, paras. 214 and 216. CD 10.4

<sup>25</sup> MHCLG, PPG, paragraph O20, reference ID: 18a–O20–20190723.

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**Project Name** Land East of Wavendon

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**Subject** Access and Movement Appraisal

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**Reference** 25061-R01

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**Date** 16/12/2025

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## 1 INTRODUCTION

### 1.1 Background

- 1.1.1 KMC Transport Planning has been appointed by Redrow Homes, Davidsons Developments Ltd and Storey Homes, herein collectively termed the 'Consortium', to provide highways and transport inputs for the promotion of policy GS15 – East of Wavendon Strategic City Extension (EWSCE) in the emerging Milton Keynes City Plan 2050.
- 1.1.2 The Consortium are supportive of the emerging MK City Plan 2050 and welcome the allocation for EWSCE and the high-level transport elements of draft policy GS15, while noting that additional detailed assessments for the site are yet to be undertaken. With regards to transport, these would be completed and presented within the Transport Assessment prepared for the planning submission of EWSCE. However, the Consortium seeks amendment of Criteria B on Policy GS15, which currently restricts commencement of the proposed residential uses to 2038 at the earliest. It also considers that the Policy's proposed access arrangements could be refined in order to further promote sustainable travel opportunities, by using Keightley Gate for active travel and public transport modes rather than all general traffic.
- 1.1.3 This Access and Movement Appraisal therefore sets out why, on transport grounds, the commencement of development at the EWSCE site should not be restricted until 2038. It also presents an alternative access scenario for Keightley Gate. It highlights the sustainable transport vision for the site to show that it is appropriate for an allocation without a delay in delivery. It also provides a review of the transport evidence that Milton Keynes City Council (MKCC) have prepared for the emerging local plan within the context of the EWSCE site, namely:
- The Infrastructure Delivery Plan (October 2025)
  - Milton Keynes Multi-Modal Transport Testing Report (October 2025)
  - Milton Keynes Multi-Modal Transport Model, Milton Keynes City Plan Forecasting Report (November 2025)
- 1.1.4 The remainder of this note is structured as follows:

- Section 1.2: EWSCE Transport Vision
- Section 1.3: Milton Keynes City Plan 2050 – Transport Evidence Review
- Section 1.4: Conclusions

## 1.2 EWSCE Transport Vision

- 1.2.1 The proposed transport vision for EWSCE demonstrates that there are no transport reasons why development of the site should be delayed to 2038, but rather highlights how the development is able to come forward in a co-ordinated and sustainable way.
- 1.2.2 The proposed transport vision for the site is based on a 'Vision and Validate' approach to managing highway impacts, such that transport infrastructure is delivered at the correct time and at the correct scale, rather than providing infrastructure in excess of what is appropriate and justified.
- 1.2.3 As such, the transport vision for EWSCE prioritises the use of higher capacity and more environmentally and socially sustainable transport networks. It firstly maximises the benefits of active travel, shared transport, the new Metro system and rail, before considering how additional vehicular connections could further enhance the connectivity and deliverability of the site. Key components of the proposed transport strategy include:
- Safeguarding of the land for the proposed Metro route through the site, which is planned to route between Central Milton Keynes (CMK) and the relocated Woburn Sands railway station as part of East West Railway (EWR);
  - Delivery of mobility hubs within the site which would provide mobility related services and infrastructure;
  - Delivery of a network of Redways and walking and cycling routes throughout the site which connect into the wider network;
  - Access to a frequent rail service from Woburn Sands railway station which is within walking and cycling distance of the site. The station is planned to be relocated slightly to the west to provide a new station served by frequent EWR services, with direct services to stations between Oxford and Cambridge;
  - Delivery of an east-west road through the site connecting Newport Road to Cranfield Road which could form part of the proposed H10 extension; and
  - Delivery of a vehicular access from Newport Road via a new roundabout, which could be delivered entirely within the land ownership and public highway.
- 1.2.4 Further to the above, at present, the MK City Plan states that development will only begin once nearby extensions, in particular South East Milton Keynes (SEMK) is substantially advanced. However, the transport strategy proposed for EWSCE is not dependent on the delivery of any specific infrastructure to support the nearby extension. As such, an integration rather than dependency approach should be taken when considering how EWSCE can be delivered before 2038. The proposed transport strategy for EWSCE allows for integration with the SEMK via:
- Provision of a north-south Metro / active travel route through the site connecting to Keightley Gate to the north, and connecting into the primary east-west road through the

site. This could provide a Metro connection to both SEMK and the relocated Woburn Sands railway station;

- The Consortium’s vision is that Keightley Gate access would be for active travel and public transport modes including the new Metro, although it is noted that the MK City Plan identifies this as being open for all general traffic. However, the Consortium considers that there is merit in exploring this further as the Concept Masterplan develops whether private vehicular traffic could be restricted from using the Keightley Gate access, to give an advantage to active travel and public transport modes in accordance with wider MK City Plan policies to promote these sustainable means of travel;
- The Consortium’s vision is that the main access for general traffic would be through the provision of a roundabout access to the site on Newport Road, designed to enable a fourth arm to be added to connect to SEMK;
- Provision of an east-west road through the site, aligned to provide for a possible extension to the west to extend to SEMK, forming part of the H10 extension;
- Potential for the east-west road to extend further east to Central Bedfordshire if land can be safeguarded for the future;
- Potential for the safeguarding of an east-west Metro route along the east-west road to provide a Metro route to the east and integrated with Woburn Sands railway station;

1.2.5 The above transport vision highlights how EWSCE could be delivered independently of other large development schemes with its own package of appropriately-timed and scaled transport infrastructure. There is therefore no reason on transport grounds for the development of the site to be delayed until 2038.

### **1.3 Milton Keynes City Plan 2050 – Transport Evidence Review**

#### **Infrastructure Delivery Plan**

1.3.1 The Infrastructure Delivery Plan (October 2025) is a supporting evidence document to the MK City Plan 2050 which identifies the strategic infrastructure needed to deliver the growth in homes and jobs planned for in the City Plan to the year 2050. It refers to the infrastructure requirements to support individual sites, including that of EWSCE. Infrastructure schemes are categorised as highways and structures, public transport, rail, and freight / distribution schemes. For EWSCE, these infrastructure requirements have been summarised in the below table:

Table 1.1 – Transport Infrastructure Requirements for EWSCE as per the Infrastructure Delivery Plan

Infrastructure Schemes	Reference	Delivery Timescale	Detail
Active Travel	Tr.AT31	Mitigation from early occupation	<p><b>Pedestrian and Cycle Infrastructure to Support new Development in MKISS Sub Area 3 - East (Wavendon-Cross End-Lower End)</b></p> <p>Connections to MK wide active mode networks, on site pedestrian and cycle routes associated with new Development. Active Travel projects could include improvement of walking and cycling routes along and crossings on Lower End Road, Cranfield Road and Newport Road, including better access to Woburn Sands station, enhancements to National Cycle Route 51 and a potential line-side active travel route linking to Woburn Sands station.</p>
Highways and Structures	Tr.H22	Unlocking sites	<p><b>Highway works to support new Development in MKISS Sub Area 3 - East (Kents Hill Roundabout)</b></p> <p>Highway connections, onsite highways and existing highway capacity upgrades associated with new Development. Highways projects could include improvement to the H8-V10 Kents Hill Roundabout to address congestion.</p>
	Tr.H23	Unlocking sites	<p><b>Highway works to support new Development in MKISS Sub Area 3 - East (local road improvements - Wavendon-Cross End-Lower End)</b></p> <p>Highway connections, onsite highways and existing highway capacity upgrades associated with new Development. Highways projects could include localised improvements on Newport Road, Lower End Road and Cranfield Road for example speed limit changes, traffic calming and junction improvements.</p>
	Tr.H24	Unlocking sites	<p><b>Highway works to support new Development in MKISS Sub Area 3 - East (New Grid Road Links)</b></p> <p>Highway connections, onsite highways and existing highway capacity upgrades associated with new Development. Highways projects could include new grid road links onto the A421 at the Eagle Farm</p>

			Roundabout (including reconfiguration of Burney Drive).
<b>Public Transport</b>	Tr.PT17	Unlocking sites	<p><b>Public Transport Investment to support new Development in MKISS Sub Area 3 - East (bus service provision)</b></p> <p>Connections to MK wide public transport infrastructure, capacity increases and on-site routes and stops associated with new Development. Public transport projects could include measures to enhance bus service routes (those unaffected by the planned Metro), including bus priority infrastructure and improved stops (e.g. replacement shelters). Services would also be supported by the completion of Fen Street as a Bus/Metro only link.</p>
	Tr.PT19	Unlocking sites	<p><b>Milton Keynes Mass Rapid Transport (the planned Metro system)</b></p> <p>Trackless public transport system, approximately 50km in length.</p>
<b>Rail</b>	Tr.R1	Longer term policy priority	<p><b>East-West Rail, rail link between Oxford and Bletchley</b></p> <p>Rail link between Oxford and Bletchley, linking to the WCML and allowing services from Oxford and potentially Aylesbury onwards towards Milton Keynes Central and Bedford via the Marston Vale Line. Proposals include the provision of two additional platforms.</p>
	Tr.R2	Longer term policy priority	<p><b>New rail link between Bedford and Cambridge</b></p> <p>East-West Rail scheme which requires investment in the existing Marston Vale Line.</p>
	Tr.R6	Longer term policy priority	<p><b>Enhancements to local connectivity to Marston Vale Line stations</b></p> <p>Local connectivity improvements to 3 stations on the Marston Vale Line</p>

<b>Freight</b>	Tr.F10	Longer term policy priority	<p><b>Freight Infrastructure requirements to support MKCP2050 Plan Growth</b></p> <p>City wide Freight infrastructure investment required to support MKCP2050 Plan Growth. City-wide freight related projects could include a <b>strategic review of lorry parking requirements</b>, including whether a long-term solution is needed to addressing informal lorry parking occurring on Fen Street once this opens to through-traffic.</p>
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- 1.3.2 As evidenced by **Table 1.1**, all infrastructure schemes deemed necessary to ‘unlock’ EWSCE or provide ‘mitigation from early occupation’ form key components of the proposed transport strategy for the site as outlined in **Section 1.2**. These schemes could be implemented without reliance on other sites being delivered in advance of EWSCE. Improvements to walking and cycling routes could be provided along Lower End Road, Cranfield Road and Newport Road. Improvements to junctions and the provision of traffic calming measures in close proximity to the site could be assessed and implemented. New grid road links could be provided as appropriate. Bus priority measures within the site could be provided, with provision made for the planned Metro route. It is important however to note that these measures should be delivered under a ‘Vision and Validate’ approach once further detail is known regarding the Concept Masterplan and phasing of the EWSCE.
- 1.3.3 The remainder of the infrastructure schemes are noted as ‘longer term policy priorities’ and thus are not deemed essential to allow development to commence at the site. Provision however would be made to allow the site to remain sensitive to the delivery of these schemes in the future, for example safeguarding land to be used for an active travel route from the site to the relocated Woburn Sands railway station as part of the East West Rail proposals.
- 1.3.4 Further to the above, notable transport and highway benefits could be realised sooner if development at EWSCE was permitted earlier than 2038. For example, development at EWSCE could support patronage of the relocated Woburn Sands EWR rail station from its anticipated opening in 2030, rather than being restricted to 2038. Benefits in terms of increased rail revenue could be realised sooner and help the new station become self-sustaining. In addition, earlier delivery of EWSCE could allow the Metro route to be delivered sooner, alleviating notable congestion at local junctions including the Kingston Roundabout and reducing rat running through Wavendon.

### Modelling Evidence

- 1.3.5 To support the MK City Plan 2050 and provide an insight into the transport modelling undertaken as part of the local plan process, two modelling reports have been published by MKCC. These describe how outputs from the Milton Keynes Multi Modal Transport Model were

used to identify the impacts of the Milton Keynes City Plan in the forecasting year 2050. They also highlight areas where future mitigation may be required including areas of concern on the Strategic Road Network.

- 1.3.6 Although neither report provides evidence of any site-specific modelling conducted for EWSCE, they do present MK-wide traffic flow plots which display highway conditions in close proximity to the site (marked with a star), for example, **Figure 1.1** below.



Figure 1.1 – Change in traffic flows between 2019 and the 2050 Reference Case (inter-peak), Source: Milton Keynes Multi-Modal Transport Testing Report (October 2025)

- 1.3.7 **Figure 1.1** shows that with regards to the impacts of the developments included in MK City Plan to 2050, Newport Road shows a -50 to -100 reduction in PCU flows, which could be attributed to the provision of improved walking and cycling routes to EWSCE and the introduction of enhanced bus service routes to and from the site. However, **Figure 1.1** also shows increases of 500 and above PCUs along the easternmost section of the A4146 Bletcham Way. If extended further eastwards, potentially linking with the M1 Junction 13, this section of road would effectively become part of the H10 road extension, providing evidence that a connection through to EWSCE via a new four-arm roundabout on Newport Road could prove advantageous to the local highway network in terms of distributing flows.
- 1.3.8 Further evidence provided within the modelling reports shows that one of the largest increases in journey times was noted southbound on Newport Road towards Woburn Sands. This could be attributed to the increased attractiveness of the relocated station with the provision of additional EWR services, meaning that new residents of EWSCE would use this route to access the rail network. Alternatively, this could also be attributed to the increased closure frequency of the Woburn Sands level crossing due to the increase in the number of rail services calling at the

station. The relative and comparative impact of these two factors on the southbound journey time increases on Newport Road is not evidenced by the modelling conducted.

- 1.3.9 However, as mentioned above, it is important to highlight that the modelling reports lack evidence of any site-specific transport modelling, and only reflect a collective picture of the highway impacts based on **all** developments included within the emerging MK City Plan 2050. As such, the standalone impact of the current EWSCE transport and development proposals is somewhat diluted for interpretation. Further to this, it should also be highlighted that the modelling focuses on the highways impacts to 2050, and that there is no site-specific interim transport modelling evidence to support the delay of development at the site to 2038.
- 1.3.10 KMC, on behalf of the Consortium, has however undertaken capacity assessments for the proposed Newport Road site access junction in the form of both a three-arm and a four-arm roundabout for up to 3,000 homes at EWSCE being delivered by 2033. The capacity assessments take into account trip distribution based on Census data and include background traffic diverting through the site. The capacity assessment for the three-arm site access roundabout on Newport Road demonstrates that it would operate within capacity. The capacity assessment for the four-arm roundabout, which also allows for a link towards the SEMK development and a development quantum of ~3,000 homes at this site, further shows that this site access arrangement would also operate within capacity. This early stage modelling provides further evidence that from a site access perspective, there is no reason for development at EWSCE to be delayed until 2038.

## 1.4 Conclusions

- 1.4.1 KMC Transport Planning has been appointed by Redrow Homes, Storey Homes and Davidsons Developments Limited, collectively termed the 'Consortium', to provide highways and transport inputs for the promotion of policy GS15 – East of Wavendon Strategic City Extension (EWSCE) in the emerging Milton Keynes City Plan 2050.
- 1.4.2 The Consortium are supportive of the emerging MK City Plan 2050 and welcome the allocation for EWSCE and the high-level transport elements of draft policy GS15, while noting that additional detailed access and modelling assessments for the site are yet to be completed.
- 1.4.3 This Access and Movement Appraisal has highlighted that there are no reasons why, on transport grounds, the commencement of development at the EWSCE site should be restricted until 2038. Indeed, numerous benefits for the Milton Keynes transport network could be realised sooner if development at EWSCE was permitted earlier than 2038, including increased public transport patronage, more rapid delivery of the planned Metro system, and alleviating congestion at local junctions and limiting rat running through Wavendon.

## Births and Birth Rates in Milton Keynes

