

Representor ID: RP-151

UI Representor ID: 804

UI Representation ID: 868

Representor Name: Simon Andrews

Representor Organisation: Bedford Estates

Policy: Policy INF1		
Legal Compliant:	Soundness Compliant:	Duty to Cooperate Compliant:
Yes	No	
Paragraph		
Compliance Comment		
<p>We have concerns about the approach to securing infrastructure contributions based on the planning benchmarks set out in Annex F. There is little in Policy INF1 or the preamble to describe how the benchmarks will be applied so it must be assumed that they are a set of rigid requirements. We do not consider this to be a sound approach. Fixing the scale of infrastructure needed in Development Plan policy allows very little scope for change during the lifetime of the Local Plan. School place planning, for example, is a highly dynamic activity that should reflect the reality on the ground rather than standards fixed many years before. The school age population is declining in many areas and this needs to be reflected in the Local Plan. It is not appropriate to assume that each of the new households being planned for in the Local Plan are “new” households to the area – many will already live in Milton Keynes and will simply be moving from one house to another. No new school age children will be generated from such movement but simply transferred from one part of Milton Keynes to another. The benchmarks in Annex F should be provided as a guide only and actual infrastructure provision will be determined on a case-by-case basis, using the most up-to-date information available at that time.</p>		
Modification Comment		
<p>The benchmarks in Annex F should be indicative only and further demographic information is required to inform the level of new school places required.</p>		
Appear at examination?	Yes	
Appear at examination reason?		
<p>To help the Inspector fully understand the issues raised by the owner of part of the East of Wavendon strategic city extension.</p>		

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Policy: Policy GS15		
Legal Compliant:	Soundness Compliant:	Duty to Cooperate Compliant:
Yes	No	
Paragraph		
Compliance Comment		
The Bedford Estate strongly supports the proposed East of Wavendon Strategic City Extension and the inclusion of the Crabtree Farm site within it. However, certain detailed aspects need further clarification, particularly in respect of the timing of development and the Concept Plan. Please see comments attached.		
Modification Comment		
The policy should provide greater flexibility in respect of development timing and greater clarity in respect of the Concept Plan. Please see comments attached.		
Appear at examination?	Yes	
Appear at examination reason?		
To help the Inspector fully understand the issues raised by the landowner of part of this strategic city extension.		

(Submitted online via consultation platform)

Development Plans
Milton Keynes City Council
1 Saxon Gate East,
Milton Keynes
MK9 3EJ

19 November 2025
My Ref: 24/418

Dear sir/madam,

**RE: MILTON KEYNES CITY PLAN 2050 – REGULATION 19 CONSULTATION
LAND AT CRABTREE FARM, WAVENDON, MILTON KEYNES**

I write in response to the publication of the Regulation 19 Draft Local Plan for Milton Keynes, entitled MK City Plan 2050.

This response is made on behalf of my client, the Bedford Estate. The Estate owns land at Crabtree Farm on the eastern side of Milton Keynes, which has been included within the proposed East of Wavendon Strategic City Extension under Policy GS15. This letter provides comments on several aspects of the plan.

Policy GS15 – East of Wavendon Strategic City Extension

The Bedford Estate **strongly supports** the proposed East of Wavendon Strategic City Extension and the inclusion of the Crabtree Farm site within it.

Policy GS15, together with the Council's evidence base in the Sustainability Appraisal and the Strategic Housing Land Availability Assessment, confirms that the East of Wavendon area is a suitable and sustainable location for strategic growth of the city. This conclusion is **strongly endorsed** by the Bedford Estate.

The scale of growth proposed in Policy GS15 (around 2,250 dwellings) is also supported and seems a fair reflection of the area in question. The Crabtree Farm site itself is particularly free from constraints, as illustrated on the draft Policies Map. The 18ha of land within the Milton Keynes area could accommodate significant development.

While we support the broad thrust of Policy GS15 and the identification of the Crabtree Farm site within it, we have a number of detailed observations and areas of potential unsoundness that we set out below.

Firstly, Policy GS15 criterion B) is explicit that development will not be permitted to occur prior to 2038. While we understand the complexities involved and the fact that some of these decisions are not within the Council's control, we nevertheless are concerned that the Local Plan evidence base does not support the explicit restriction on development pre-2038. We would advocate a more flexible

approach in Policy GS15 that highlights the specific dependencies involved but that still allowed the Council some flexibility for earlier delivery if circumstances changed.

Our second area of concern is in relation to potential confusion around the area of open space required. Policy GS15 e) criterion 11 indicates a new District Park of at least 15ha is required. However, the Concept Plan set out at Figure 2 shows an area coloured green as a “New District Park and Landscaped setting for Heritage Assets” and this area extends to around 35ha – substantially greater than criterion 11. The Open Space Standards set out Annex C specify an area of at least 12ha for a District Park, which introduces a further complicating factor. At this stage there does not appear to be a need for a 35ha area of open space on the site, particularly since a major access road is likely to need to run through this area, as indicated on the Concept Plan.

A third area of concern is in relation to the status of the Concept Plan at Figure 2. The Concept Plan is not referred to in Policy GS15. The only reference to the Concept Plan is in the preamble at paragraph 106, which states that “A constraints and opportunities-led Concept Plan is shown below to illustrate key elements and how the site may be developed”. Such a description, with words like “illustrate” and “may”, suggests a non-binding, indicative type of plan, rather than something that would be rigidly followed at later stages. If that is the approach, it should be confirmed in Policy GS15. Given the requirement in criterion D for a Masterplan and Design Code, it may be better for the concept plan to be omitted in its entirety from Policy GS15 and leave the spatial distribution of development to the Masterplan process, when a full suite of evidence will be available.

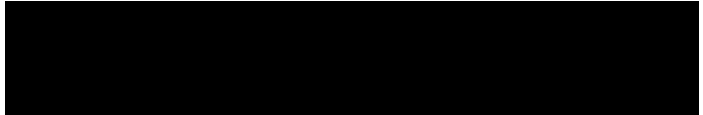
However, notwithstanding the three aspects above, we continue to **support** the broad thrust of Policy GS15.

Policy INF1 – Infrastructure first principles

We have concerns about the approach to securing infrastructure contributions based on the planning benchmarks set out in Annex F. There is little in Policy INF1 or the preamble to describe how the benchmarks will be applied so it must be assumed that they are a set of rigid requirements. We do not consider this to be a sound approach. Fixing the scale of infrastructure needed in Development Plan policy allows very little scope for change during the lifetime of the Local Plan. School place planning, for example, is a highly dynamic activity that should reflect the reality on the ground rather than standards fixed many years before. The school age population is declining in many areas and this needs to be reflected in the Local Plan. It is not appropriate to assume that each of the new households being planned for in the Local Plan are “new” households to the area – many will already live in Milton Keynes and will simply be moving from one house to another. No new school age children will be generated from such movement but simply transferred from one part of Milton Keynes to another. The benchmarks in Annex F should be provided as a guide only and actual infrastructure provision will be determined on a case-by-case basis, using the most up-to-date information available at that time.

The Bedford Estate is working with the promoters of land around the Crabtree Farm site to ensure a coordinated approach to development. The Estate would welcome engagement with the Council in respect of masterplanning and related issues.

Moving forward, it is vital that the Council engages positively in discussions with Central Bedfordshire Council on their emerging Local Plan. Allocation of the East of Wavendon Strategic City Extension,

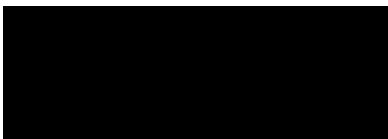


while welcomed, is effectively only half the story. Considerable joint work between the Councils will be necessary if the full benefits of growth in this area are to be realised.

To summarise, the Bedford Estate strongly supports the Council's direction of travel as set out in the draft MK City Plan 2050 and looks forward to engaging positively in future discussions.

If you have any queries or would like to discuss this matter, please feel free to contact me.

Yours faithfully



Simon Andrews
Strategic Planning Manager