

**Representor ID:** RP-148

**UI Representor ID:** 373

**UI Representation ID:** 864

**Representor Name:** Steven Thomas

**Representor Organisation:**

<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 response is submitted on behalf of a residents group, Wavendon Voice, who are campaigning for a Park to be established on the wider Parkland area associated with the Grade 2* listed Wavendon House which until recently was used as a golf course. A link to a video showing this area can be found in the attachment.</p> <p>Wavendon Voice supports the proposals for the East of Wavendon Expansion area and particularly the establishment of a Park within it centered around these heritage assets. However, we consider there are various issues with the Plan which make it unsound as currently drafted.</p> <p>In particular, the Concept Plan contains errors such as the Park being shown as twice the currently suggested minimum size as well as omissions (the main grid road and highways corridors are not shown) which together make it misleading.</p> <p>While we generally support the Council's proposals that wider development of the Expansion area should not take place before 2038, there are good arguments that a limited amount could be permitted before then in order to release the necessary funding to allow a Park to be available for the local population much earlier. The primary argument supporting this is that the residents of the local area in this part of Milton Keynes have been starved of sufficient green space to comply with National Guidelines during recent developments such as the SLA as well as upcoming ones such as SEMK.</p> <p>We strongly support the improved focus on the protection of significant Heritage assets in the area, notably Wavendon House with its registered Park and Garden and additional protection for Cross End when compared to the Reg18 proposals.</p> <p>The layout of this consultation makes it difficult to provide a concise and measured response, so I have attached a short 4 page document which provides a succinct summary of where we support the Plans and areas we believe demand and warrant further attention.</p>		
<b>Modification Comment</b>		
<p>The Concept Plan needs to include primary Highway links and show how these would impact the layout of a Park on the area. Together these would prevent the plan providing a misleading impression of what the area could look like.</p>		

We believe there are strong arguments to make the minimum size of the Park larger, closer to the Green space currently shown on the Concept Plan. This would help resolve issues with the amount and availability of accessible green space in the local area.

While generally supporting the Council's intention to avoid full scale development before 2038, allowing limited development in the expansion area before then could allow the benefits of the Park to be provided earlier than this date to relieve issues generated by recent and upcoming developments.

Further work needs to be undertaken on Transport links into the site and on noise attenuation measures alongside any H10 extension particularly when it runs alongside the Park. Such measures are always much more expensive if implemented at a later date.

<b>Appear at examination?</b>	Yes
-------------------------------	-----

<b>Appear at examination reason?</b>
--------------------------------------

The strength of support within the local population, with close to 1,000 named supporters for Park, demands that our voices (not just mine) are heard by the Inspector before a final decision is made.
---

## **Wavendon Voice submission to MK 2050 Reg19 Consultation**

This response to the Regulation 19 Consultation is submitted on behalf of **Wavendon Voice**, a residents Group drawn from a wide area of Southeast Milton Keynes including the new areas of Glebe and Eagle Farms. We operate with both the knowledge of and full support from Wavendon Parish Council who we understand are making a separate submission on this and other topics.

Well over 700 people have joined our campaign for the establishment of a Country or District Park on land which was previously Wavendon Golf Course. This would provide a significant area of accessible open space for the rapidly expanding communities in the Southeast of Milton Keynes, which have no similar facilities unlike the more established parts of the City. It would help preserve the iconic old parkland associated with the Grade 2\* listed Wavendon House and make an important contribution towards meeting required biodiversity and net gain targets resulting from the development of the SEMK (South-East Milton Keynes) SPD as well as the proposed East of Wavendon expansion area.

A video made of the area by the group which provides a useful overview of what we're trying to preserve can be found at <https://youtu.be/Vu1JGBacGgc?si=3j4CsTmvnO07PHIN>.

### **Wavendon Voice Response to MK2050 Regulation 19 Consultation**

In the context of the objectives set out above, Wavendon Voice would like to submit the following comments to the Regulation 19 Consultation:

1. We strongly support the inclusion of a District Park within the East of Wavendon Expansion area (Policy GS15). We also welcome the proposals contained in the Concept Plan for the layout with a focus on protecting Wavendon House and its registered Park and Garden along with the historic carriageway to the west towards Cross End. The proposals not only broadly follow our own suggestions but also recommendations within the Heritage Impact Assessment provided in the evidence provided by MKCC which state the need to protect the heritage Parkland as much as possible. It's worth noting that Buckinghamshire Garden Trust recommended that the entire historic Park should be designated as a registered Park and Garden in a report to Historic England in 2020, well beyond the area currently protected by that status.
2. The Concept Plan (Figure 2 in the Draft) shows a Park area considerably larger than the minimum 15 hectares proposed in Policy GS15. We estimate the area shown in green and highlighted as Parkland to be closer to 30 Hectares in size, or roughly twice the minimum size. While we acknowledge the plan is only provided for illustrative purposes, we consider a larger Park area would serve the needs of the local residential population, and we would strongly support maximising the area of the Park area where possible. (see points 4 and 5 below).

3. While discussing the Concept plan, there is also no suggestion for where any grid road or MRT corridors would be located. Correcting this omission would be a significant change and along with our concerns about the Park size discussed in point 2 means a false impression may be unintentionally being provided of what the area might look like.
4. We welcome the larger size for the District Park compared to the Reg18 Proposals but believe there are many arguments supporting a further increase.

Over recent years the population of Wavendon has grown exponentially and that trend is set to continue. From under 400 houses a decade ago, the Parish now contains around 4,000 and is set to increase significantly due to both the existing SEMK SPD and the new East of Wavendon Expansion area. It's very likely that by 2050 Wavendon will contain almost 8,000 houses, representing a more than twenty-fold increase within 40 years. Recent developments such as the SLA (Eagle and Glebe Farms) contain no formal parkland and what green spaces have been provided are primarily sited alongside busy and polluting highways, notably the A421. The SEMK SPD contains only a minimal area of large green space (the Woburn Sands Buffer) for what looks likely to be close to 4,000 homes. In addition it's also very likely that the Aspley Guise Triangle to the East in Central Bedfordshire will be put forward for further housing when their own new Development Plan is put forward, adding yet more housing in the area.

It is essential to meet the needs of this rapidly growing new population in line with the government targets for healthy living. A significant area of parkland at its heart will help to do so. According to MKCC's own research (Appendix 3, Plan 2050 "Open Space Assessment Report 2023") there is approximately 101 square metres of open space per person in Milton Keynes. Applying this figure just to the proposed 2,250 homes in the East of Wavendon development area would mean an open space area of almost 70 hectares and this does not take into account the severe lack of accessible open space in the built areas of Glebe and Eagle Farms.

5. The old Golf Course, located on the historic wider Parkland surrounding the Grade 2\* listed 18<sup>th</sup> Century Wavendon House and its registered Park and Garden, represents an ideal opportunity to bring forward a new District or indeed a larger Country Park. It is already largely laid out as such, so there would be minimal costs involved in converting it. The Council's Heritage Impact Assessment provided in evidence to this plan fully supports this. It suggests that any development within the former Parkland would be likely to cause harm to heritage assets due to the designed nature of the landscape, the wider rural character and the way it links a series of heritage assets together.

The 30 Hectare area shown in the Concept Plan looks much more appropriate than a smaller 15 Hectare Park. Another way of looking at this is that a 15 Hectare Park would provide a protective strip around the Registered Park and Garden just 125m wide and extending this to protect the Ancient carriageway to the West with its Scheduled Monument would reduce to under 75m. That

does not appear to us to be adequate to provide any real level of protection, nor context, for one of the primary heritage assets within the City.

6. We strongly support the views of the City Council expressed in the Draft Plan that any development of the old Golf Course should be made in sympathy with the existing environment and that heritage features, such as the former driveway to Wavendon House, should be protected. We are therefore asking that any housing immediately surrounding the Park is designated as low density and designed to promote a rural ambience in keeping with the existing environment.
7. We broadly support the proposal by MKCC to delay development of the East of Wavendon expansion area until 2038. Given the extent of other already scheduled developments in the area, notably the SEMK SPD, and likely works related to East West Rail such as the relocation of Woburn Sands Station, we believe it is necessary to allow time for these to be integrated effectively and for the impact on local infrastructure to be assessed. Large scale development before SEMK is largely complete would also mean that residents would be surrounded by major building works on two or even three sides.
8. However, given the pressure on available Green space locally we would like the benefits of a Park to be provided as soon as possible, preferably well before 2038. We therefore recognize and accept that there is an argument to permit limited and small-scale development on sections of the site sooner in order to create the Tariff funding opportunities necessary to bring a Park forward earlier.
9. We believe that more work is required to determine where the Transport links into the East of Wavendon expansion area should be located. MKCC are proposing that a grid road is provided from Keightley Gate to the north providing a primary Transport corridor into the site with secondary access along the H10 corridor, while we understand the Developers are suggesting that the H10 corridor should be the primary, and indeed potentially the only link with no road access from the north, only the MRT route. Once Central Bedfordshire Council bring forward their updated Development proposals it is likely that another major road access would be available from the East, possibly along an extension to the H10 corridor through to J13 of the M1. However, until the H10 through SEMK is extended to Newport Road, currently not in any plan, any development would inevitably generate a huge increase in traffic along Newport Road and either through to Kingston roundabout or through Wavendon village which has already seen a huge increase of through traffic recently due to the inadequacies of the current primary road network. Any significant grid road corridor from the North would inevitably cut the ancient carriageway from Wavendon House to Cross End in two, through an area where many of the more significant trees in the old Golf course are located and close to both Cross End and the Scheduled monument. These issues require more planning at an early stage to ensure that any

developments that might be permitted in the interim do not preclude the best long-term solutions for the wider area.

10. We also believe that more planning is required into addressing any potential noise attenuation requirements resulting from traffic along the grid roads in the future, notably the H10 corridor which is likely to run alongside any new Park. We are already seeing significant issues locally in Eagle Farm from noise generated by the A421 and M1, and it's essential to avoid similar problems in the East of Wavendon expansion area, particularly if Central Bedfordshire Council come forward with proposals for the Aspley Guise triangle. If that were to happen the H10 is likely to become another major transport route from the M1 towards Bletchley and Southern Milton Keynes, potentially similar in scope to the A421 and A509 today. As well as the impact on future residents, a new Park running alongside such a major grid road would have much reduced value unless sufficient noise attenuation measures were provided and adding these afterwards would be hugely expensive.
11. We strongly support the improved recognition of the character of Cross End and of the need for an improved Buffer to protect it from any impact generated by the East of Wavendon expansion area. There is an obvious opportunity to link this Buffer to the proposed Park which would provide even more protection for Cross End as well as for the ancient scheduled monument.
12. When the Park is designed, we suggest that a focus is required to provide a green corridor to it from Eagle and Glebe Farms considering the lack of usable Green space in both locations. The primary area residents have been provided with to date is alongside the A421 and subject to heavy noise and pollution issues so ready access to usable green space is essential for them.

In conclusion we wish to emphasise our support for the proposals outlined in the MK2050 plan with respect to the creation of a district park in the East of Wavendon expansion area. The former golf course provides a perfect opportunity to harness land that has already been laid out as parkland and create a facility that will bring to generations of residents the benefit of a green, healthy and stimulating environment as well as maintaining the legacy of parkland development for which Milton Keynes is already widely envied.