

Dear Sir/Madam,

## **Milton Keynes City Plan 2050, Regulation 19 Consultation**

We write as Central Bedfordshire Ward Councillors for the Cranfield and Marston Ward representing the parishes of Cranfield, Marston Moretaine, Lidlington, Ridgmont, Hulcote and Salford and Brogborough.

We OBJECT to the Milton Keynes City Plan 2050 Regulation 19 proposed submission, which we do not consider meets the soundness test for the following reasons:

### **1. There has been no consultation with communities outside the Milton Keynes Local Authority Area**

Given that the proposed future expansion of Milton Keynes is heavily weighted towards the east of the city and especially through Policy GS14, Eastern Strategic City Extension and Policy GS15, East of Wavendon Strategic City Extension, we are extremely concerned by the complete absence of direct engagement during this and the previous regulation 18 consultation, in neighbouring Central Bedfordshire.

The Eastern Strategic City Extension and East of Wavendon Strategic City Extension will both directly affect the adjoining neighbouring communities in Central Bedfordshire, particularly Cranfield and Hulcote and Salford. We are extremely concerned about the impact of expansion to the east of MK on these villages.

We are also extremely concerned about the wider the traffic impacts from the proposed development to the East of Milton Keynes, which will be felt across all the villages we represent.

I raised the absence of consultation in neighbouring Central Bedfordshire with your officers at the Moulsoe consultation event on the 17th of September 2024 at the Regulation 18 stage and a commitment was made by [REDACTED] Development Plans and Delivery Manager at MK Council, to properly inform and consult neighbouring communities in Central Bedfordshire at the Regulation 19 stage. This commitment has not been honoured.

No level of engagement or notification has been undertaken with the communities in Central Bedfordshire that we represent, despite being directly affected by these proposed city extensions.

## **2.The MK City Plan draws on an unsound planning document to support it's strategy.**

I raised concerns regarding the MK2050 Growth Study in 2020, which proposed expansion of Milton Keynes at a several possible locations in Central Bedfordshire including in the Marston Vale, without Central Bedfordshire's agreement. Whilst these sites were withdrawn at Central Bedfordshire's insistence, reference is still made to the 2050 Growth Study in this Regulation 19 consultation saying it has 'informed' the growth strategy, which includes the substantial expansion to the east of Milton Keynes. I am concerned that the justification for growth to the East of MK relies on the MK 2050 Growth Study 2020 document which was not a properly made planning document.

## **3.Transport Grounds**

**We consider the Regulation 19 proposed submission does not meet the soundness test because traffic impacts on the neighbouring roads and communities in Central Bedfordshire are not acknowledged or assessed and no mitigation is proposed.**

Given the weighting of major development to the east of MK with both the Eastern SCE and the Wavendon SCE directly abutting the Central Bedfordshire boundary there will be significant cross-boundary traffic impacts on the local and strategic highways network in Central Bedfordshire.

Whilst there has been some modelling over the 'simulation area' the impacts on Central Bedfordshire roads are not fully shown in the consultation documents and no mitigation is proposed.

Any cross-boundary highways impacts must be appropriately identified and mitigated, working collaboratively with the neighbouring local authority and affected communities.

The MK MMM (MK City Plan Forecast Report) figure 2.1 Highway Modelled Area shows the highways network to the east and south east of MK city, in Central Bedfordshire is included in the simulation area.

The results of these studies, illustrated in the Highways flow difference maps in chapter 4 of the MK City Plan Forecast Report do not cover the whole of the simulation area but focus on the city area. Significant increases in traffic volumes are shown on roads in Central Bedfordshire which are illustrated on the margins of the maps, but the information is incomplete because the figures do not cover the whole of the simulation area.

From what we can see, there will be an increase in highways volumes on the trunk roads in the AM peak for example for 'Priority 1 including mass transit' Figure 4.4 shows the big road links linking the Eastern CSE and MKC will be very congested. – well over 100% increase in traffic at M1 J14 and on the A41. This congestion is likely to result in traffic will transferring onto local roads in Central Bedfordshire.

We also question whether the cross M1 highways routes will have the capacity needed to take the additional demand generated by the Eastern SCE and how this will be assessed and addressed.

Figure 4.4 also shows a significant increase in highways volumes on the local roads in Central Bedfordshire. For example, on Crawley Road and the Salford Road staggered crossroad show 150 – 350 extra vehicles at the AM peak.

In another example, at the PM peak, in Figure 4.6, Folly Lane, a single-track lane with few passing places connecting N Crawley with the University, shows an increase of greater than 500 vehicles – impossible! This is not practically feasible, so where will this traffic flow instead? Will it flow from N Crawley along Crawley Road into Cranfield? Then where does it go? What is the impact on Cranfield?

At the PM peak (figure 4.6) the A421 at Salford shows an increase of more than 500 vehicles. Where is the cumulative impact of this additional traffic assessed? National Highway's VISSIM studies of J13 and the A421 already show severe congestion in these locations.

Where are the other changes in highways flows covered by the simulation model and which are not illustrated? What are the effects on Cranfield, which is obscured (in figures 4.4 and 4.6 for example) by the key in the top left-hand corner?

What are the predicted highways impacts across the wider village network in our ward, such as at Ridgmont and Brogborough, which are adjacent to Junction 13, the A421 and A507, and Lidlington and Marston both of which experience rat running through from the A421 to the A507? No information is provided.

### Junction 13, M1

Given the heavy weighting of development to the East of Milton Keynes, the impact on the wider arterial road network must be fully considered. We remain deeply concerned at the cumulative development proposals across the area, including Universal Theme Park, development in Beds Borough, Central Beds and MK and the impact these will have on the major highways network, especially at Junction 13, where there seem to be absolutely no proposals coming forward to improve capacity, with the consequent impact on all the local communities.

We saw in September 2024, all too painfully, what happens when the A421 is knocked out with flooding at Marston and the consequent congestion, disruption and road chaos forced on the local communities.

We also note that National Highway's own modelling at VISSIM modelling at J13 shows that when the current committed development across the area is taken into account the performance of the junction is 'severely degraded'.

The capacity constraints at J13 need to be acknowledged and the impact of the additional proposed growth in the MK City Plan needs to be acknowledged and addressed.

### In conclusion

There must be a robust assessment of the cross-boundary impact of the proposed development traffic on the local and strategic highways network, working closely with the Central Bedfordshire Highways Team to deliver appropriate mitigation.

#### **4.No recognition of a landscape impact**

The strategic sites must include an assessment of their impact on the landscape in terms of their views and impact on visual amenity. Attention

should be given, and mitigated appropriately, where the city extensions abut Central Bedfordshire; where an urban landscape abuts a rural area. How will this be appropriately landscaped and buffered to avoid a hard edge to the urban settlement with the countryside? What will be the impact on the landscape amenity in the neighbouring countryside? How will this be considered and mitigated?

## **5. Comments on specific policies**

### **Policy GS11**

We OBJECT to this policy. We do not agree with the reference in this policy to sites which are '*wholly or partly within the administrative boundary of a neighbouring authority*'. We do not support any growth within Central Bedfordshire that is an extension to an urban development in Milton Keynes. It is for Central Bedfordshire to determine where and how housing growth is delivered within its administrative area. As a rural area we would not expect to see urban extensions that follow the 'principles' of a neighbouring authority, but a style of development reflective of our rural landscape character.

We consider it inappropriate for other authorities to decide how developments should be delivered within our local authority area. This policy should respect the character and appearance of the areas adjacent to MK. Not simply consider development from Milton Keynes' perspective.

The policy references that development proposals on the edge of MK's administrative area are likely to have significant impacts on the infrastructure and services of Milton Keynes, but there is no comparative reference to the impact of development proposals in MK city on neighbouring local authority areas.

Point 7 for example says the traffic impacts of the development in neighbouring authority areas on the highways network within MK should be robustly assessed and mitigated. But there is no comparative reference to the impact of MK development proposals on neighbouring authority area road networks and how these will be assessed and mitigated.

### In conclusion

We are concerned about the way this policy is worded. We also question how MK would propose to enforce such a policy in another authority area. If the policy is to be retained, we respectfully request that it is rewritten to

be more balanced so that should any cross boundary development arise, it is assessed properly and mitigated from the perspective of both authority areas. The wording should include a requirement for collaborative working from both authorities rather than Milton Keynes attempting to dictate to their neighbours.

### **Policy GS14**

We object to policy GS14.

We are very concerned that this very large extension site abuts Central Bedfordshire at Hulcote and Salford and extends very close to Cranfield. Cranfield and Hulcote & Salford residents and the Parish Councils have not been actively consulted during the plan making process.

Both Parish Councils need to be involved in all stakeholder groups and in any future discussions regarding this site to ensure any impact on our community is appropriately and robustly considered and mitigated. All infrastructure required to mitigate impacts of growth, including the impact of this growth in neighbouring Central Bedfordshire must be delivered first, ahead of development.

We note that in the past representations made by Central Bedfordshire Highways, Cranfield Parish Council and myself regarding the traffic impact on Cranfield of the MK East allocation were disregarded by Milton Keynes Council. The increase in traffic on the High Street in Cranfield predicted as a result of MK East triggered certain thresholds that required mitigation. This was formally requested by Central Bedfordshire Highways Officers and was completely ignored by MK Council. I even attended the planning meeting where outline permission for MK East was granted to request further studies and mitigation but I was not allowed to address the Development Management Committee meeting.

We do not expect to see a repeat of this.

All traffic assessments for the Eastern Strategic City Extension allocation must include a full cross boundary impact assessment with the appropriate mitigation identified and agreed with Central Bedfordshire Council. This needs to be added to the policy.

Further, we are still unclear as to the nature or role of a mass rapid transit service or how it might relate to neighbouring villages in Central Bedfordshire.

Buffering and landscaping are referenced in relation to Mousloe, but no reference to wider landscaping impacts on the rural landscape character at the edge of development, which will impact Central Bedfordshire. There should be an appropriate edge of development landscaping and buffering strategy. This needs to be added to the policy.

There is no reference in the policy to cross boundary working with the neighbouring authority and residents. We emphasise again the importance of cross boundary consultation and involvement with local residents, Parish Councils and ward Councillors should this allocation be taken forward. We respectfully request that this is added to the policy.

#### In conclusion

The policy wording needs to include clear reference to highways, landscape and infrastructure impacts the ESCE is likely to have on the neighbouring Central Bedfordshire. The policy should make reference to the robust assessment and mitigation of these. There should be clear reference to collaborative working and dialogue with Central Bedfordshire Council and more local neighbouring stakeholders to ensure any cross boundary impacts affecting our residents and communities are adequately acknowledged, understood and mitigated.

#### **Policy GS15**

We object to this policy.

This is also a significant proposal which extends right up to the boundary with Central Bedfordshire and directly impacts Hulcote and Salford Parish. The policy states that this site will 'enable linkages with potential future growth land adjacent to the allocation outside of Milton Keynes.' This statement appears to pre-empt the Central Bedfordshire Local Plan. For the avoidance of doubt, we do not support any proposal for the extension of Milton Keynes into Central Bedfordshire.

We are concerned about the impact this allocation may have on infrastructure in neighbouring Central Bedfordshire and stress the importance of infrastructure especially where it is required to mitigate growth being delivered first.

There is no reference to edge of development landscaping/buffering to protect the rural character of Salford and Hulcote villages. This needs to be added to the policy.

We are concerned about the highways impacts of this development on the road network in neighbouring Central Bedfordshire. For example, it would appear that one of the most likely routes for traffic to flow out of the development is onto Cranfield Road. This would take traffic into Salford village, in order to turn left towards J14 or right towards Junction 13 and the A421. This would not be an appropriate route for additional traffic. Salford and Hulcote village already experience rat running between the 2 motorway junctions, plus there would be the additional traffic generated by the Eastern SCE as well as the already permitted East of MK development.

All traffic assessments for the East of Wavendon Strategic Extension allocation must include a full cross boundary impact assessment with the appropriate mitigation identified and agreed with Central Bedfordshire Council. We respectfully request that this is added to the policy.

We are unclear as to the nature or role of a mass rapid transit service or how it might relate to neighbouring villages in Central Bedfordshire. We also note there is no reference to safeguarding a route for the H10 across to the A4241. This would help divert traffic away from the villages and should be provided for in the Policy.

We respectfully request that these points are added to the policy.

### **Overprovision of Housing Growth**

We note MK City Plan 2050 makes an overprovision for housing growth by about 19%. Given that so much growth is proposed to be to the east of the city, we are deeply concerned as to how this might impact the neighbouring communities of Cranfield and Salford & Hulcote in the immediately adjacent areas to these expansion sites in Central Bedfordshire with the resulting pressure on our infrastructure and road network and loss of open countryside, as well as across the wider road network.

Milton Keynes needs to be able to justify the significant over provision of growth proposed.

We do not consider that there needs to be so much significant housing growth to the east of the city across these 2 sites given the overprovision of housing proposed in this consultation.

We are extremely concerned about the impact of these major city extensions on neighbouring infrastructure including the road network. Milton Keynes must ensure all of the infrastructure required to support growth can be delivered and funded to make sure there is no impact on the neighbouring communities. Our infrastructure is already fully stretched. There also needs to be high quality and significant landscape buffering provided if these sites are to be taken forward.

### **Conclusion**

Thank you for the opportunity to comment on these proposals. We respectfully request that our comments are taken into account and are reflected in modifications to the relevant policies.

We request to be able to address the Inspector on these matters at the Examination in Public.

Yours sincerely,

Sue Clark

on behalf of Cllr Robert Morris and Cllr Sue Clark.

22<sup>nd</sup> December, 2025

