

Ref: Shenley Park SPD consultation,
Planning Policy,
Buckinghamshire Council,
Queen Victoria Road,
High Wycombe,
HP11 1B

Response to the draft Shenley Park Supplementary Planning Document 2023

Dear Sir / Madam

I am writing to raise significant concerns regarding the draft Shenley Park Supplementary Planning Document (SPD).

Milton Keynes City Council (MKCC) originally objected to the proposed allocation through the Vale of Aylesbury Local Plan (VALP) examination in 2019, due to the process of site selection and the potential impacts it could have upon Milton Keynes if not adequately mitigated. The Inspector helpfully amended Policy D-WHA001 in response to many of our concerns, providing a policy basis to ensure the impacts of Shenley Park on Milton Keynes could be properly mitigated. As Policy D-WHA001 states, the preparation of an SPD for the site helps ensure that a comprehensive development comes forward, giving further clarity on how impacts should preferably be mitigated.

MKCC considers the draft SPD is worryingly lacking in this regard.

As the detailed comments in Appendix A set out, the SPD fails to provide clarity or certainty on how the necessary movement and highways, education and health infrastructure will be planned for and secured. We understand that the A421 Corridor Study being undertaken by Buckinghamshire Council is due to report back by the end of 2023. We would expect this work to inform further assessment, including appropriate highway modelling, of the impacts associated with Shenley Park and cumulatively to better understand what interventions are required. The draft SPD needs to be modified, in light of this and through further engagement with MKCC and infrastructure providers, to ensure planning applications follow a clear mitigation and infrastructure strategy.

MKCC is committed to working constructively with Buckinghamshire Council so that the SPD can be revised in a manner which ensures the best possible outcome for the residents of Milton Keynes.

I expect the detailed comments set out in Appendix A to be given serious consideration and look forward to seeing an amended SPD in due course. It is critical that the interests of the existing residents of Tattenhoe Park and Kingsmead are properly safeguarded, and that the impact of the proposed new development on Milton Keynes is appropriately mitigated.

Yours faithfully,

A handwritten signature in black ink, appearing to read "Pete Marland". The signature is written in a cursive style with a prominent underline at the end.

Councillor Pete Marland, Leader, MKCC

Appendix A – Detailed comments on the draft Shenley Park SPD

As per our stance on the impact of Shenley Park, which were outlined during the examination of the VALP, the main issues of concern remain:

1. Highways and Transport
2. Education
3. Health
4. Green Infrastructure

Our stated position on urban extensions to Milton Keynes that reside outside of the Council's boundary is set out within Policy SD15 of Plan:MK. Policy SD15 provides a framework for how such urban extensions should be planned and designed so that they integrate well with the existing city, adopting many of the distinctive principles and features of Milton Keynes.

We appreciate the general reference to Plan:MK and Policy SD15 in section 2.1 of the SPD. However, it is important to note that Policy SD15 (B.10) intends to ensure infrastructure is adequately funded and delivered to accommodate the impacts and demands created by the development. To help address these concerns the SPD should include consideration of how the development of Shenley Park will address, in full, the requirement of each criteria listed in Policy SD15.

We are extremely concerned that the SPD defers much of the infrastructure assessment to future planning application stages, offering no certainty on how the impacts of this development are being mitigated. This is intrinsic to the purpose of the SPD in ensuring a comprehensive development comes forward through subsequent planning applications. As a result, Part Eight (Delivery and Phasing) of the SPD and the supporting evidence offers very little detail or certainty on the scale of infrastructure required and whether and how this will be viably provided. Given the substantial impact that this development will have on Milton Keynes, and the fact that a planning application for the site has already been submitted by Crest Nicholson, this issue needs to be addressed urgently to understand the scope and scale of infrastructure requirements, and any mechanisms agreed upon to deliver it. This issue must not be simply deferred to the consideration of a planning application.

Highways and transport

Overall, we do not consider that the access and connectivity strategy of the SPD reflects Policy SD15.B.2 of Plan:MK. The current proposals do not reflect the prevailing character of this part of Milton Keynes city which the site will form an extension to. If necessary, we would favour those options that create local links only, and not an extension to the traditional grid road network because of the nature of housing already built onto the H6. This is reflective of the principle underpinning Scenarios 4 and 5 that are identified within Annex 5 (Connectivity Scenarios – Emerging Thinking) of the draft SPD.

Part Three

Figure 3b shows both Redway and Active Travel connections but there is no obvious explanation of the distinction between the two. On this plan and elsewhere in the document (e.g. Fig.7) Bridleways are shown as a separate category. Clarity is needed on what type of routes these are to reflect the distinct nature of movement routes within Milton Keynes.

The plan does not adequately show onward routes outside of the site, with surrounding areas greyed out and routes are not visible. The types of route potentially being connected to is therefore not clear. The plan also fails to show connected routes through the site so it is unclear how active modes will cross and pass through the site.

Part Four

Pedestrian and cycle routes do not appear to reflect current usage or desire lines but have been moulded to reflect other constraints imposed by the development. Efforts should be made to maintain current usage and desire lines wherever possible.

The treatment and reuse of the 'closed' sections of Shenley Road between Coddimoor Lane and Kingsmead is unclear. Regardless of whether this road is to be downgraded / closed / reclassified, the SPD should state clearly what role it plays in movement framework for the site.

This section of Shenley Road (Sudeley Place to Coddimoor Lane) is one of the most highly used cycle routes in and around Milton Keynes. The evidence report does not mention cycle (or pedestrian) data. A review of the Strava Heatmap will confirm the use of this route. It is imperative that this cycle route is preserved and enhanced.

The northern end of the existing Bridleway to the west of the site, where it meets Shenley Road, has no direct, legible or convenient onward connection to the east and towards MK. Whilst movement is possible, the SPD does not make this clear or how it would be made convenient. Similarly, the eastern end of the footpath slightly to the south also fails to connect in a legible and convenient way to routes within the site. Priorities at these locations are also unclear, particularly where access traffic is retained. The routes for pedestrians, cyclists and riders should be given priority over local access requirements.

The underpass on the boundary walk is 'offline' creating a route away from the desire line and introducing bends on approaches which will reduce the visibility through the underpass. This will reduce the safety of users and the perception of safety of the route, undermining attempts to encourage more active travel.

The Redway running from H6 to/through the local centre should be continued to the south-west and up to the safeguarded land for the "link road" only if this option is to be pursued. Furthermore, land for an underpass should be shown where the Redway meets the "link road" and that land should be safeguarded for future use, again only if this option is to be pursued.

Residents in Canterbury Meadows currently benefit from vehicular access via Shenley Road to Milton Keynes and local facilities. The proposals would significantly lengthen journeys for

these residents thus reducing other potential sustainability gains. The closure of Shenley Road in the proposed location is not explained. For instance, it is not clear why the closure could not be immediately south-west of Canterbury Meadows. Closure of this section of road will require a traffic order obtained by MKCC not Buckinghamshire. Securing this is not guaranteed. It is not clear whether this has been considered in preparing the SPD and, in the event closure is not deliverable, what the alternative proposal would be to guide applications.

The proposed “link road” seems to duplicate a section of Shenley Road, which may not be an efficient use of land and introduce more highways infrastructure in this part of the site than is necessary.

Part Five

Whilst we appreciate that not all variables can be fixed at this stage in the planning and design process, the options presented indicate that the SPD does not provide clarity on the framework and infrastructure requirements and how these would be preferably met, with it being unclear what options are being reserved. The role of an SPD is to set the framework within which comprehensive development can come forward. The SPD avoids key structural decisions by allowing the applicant to lead the process through subsequent stages of the planning process which is unsatisfactory.

Part Nine

The Buckingham Strategic Model is unsuitable for testing the impact of Shenley Park. In response to the Transport Assessment for the recent planning application, Buckinghamshire Council confirmed that the Strategic Model would not be a suitable tool for the outline planning application process, because it does not extend into the areas which the proposed development would have most influence on (i.e. Milton Keynes). Therefore, the reference to the need to use the Buckinghamshire model, in section 9.1 of the draft SPD, should be amended to refer to; “Transport Assessment based on detailed highway modelling.”

Active travel

The aspirations for active and sustainable travel from the proposed new development are to be commended, but there could be further strengthening of the SPD document in order to ensure this behaviour is realised. The SPD rightly refers to following sound placemaking principles, however the proposed road network retains through-routes on inappropriate lower category streets. This will maintain current ‘rat-runs’ and cause severance within the new neighbourhoods. Traffic activity is generally inversely proportional to levels of active and sustainable movement, so segregation or walking and cycling priority streets should be considered. Through traffic routes should certainly be avoided through residential areas, and the development should adopt a ‘traffic cell’ approach, where traffic can enter and leave from a number of points, but there is no permeability for motor traffic through the residential area. The proposal to apply this principle, while retaining access for public transport, is to be welcomed in order to give public transport and sustainable travel a

directness advantage over private car trips but needs to be reflected in the movement framework within the SPD.

The SPD further undermines the importance of non-vehicle modes by explaining its approach to pedestrian and cycle routes after vehicle connections, which is at odds with a movement hierarchy and framework that prioritises active modes within the development. The quality of both internal and external walking, wheeling and cycling routes will be critical in achieving the desired levels of active and sustainable travel. Consequently, the statement about walking and cycling routes providing direct connections where practicable seems weak, and offers the developer the opportunity to cite development layout as a reason for indirect walking and cycling routes. The design of these routes is critical and their direct alignments should inform the layout of the development, and not the reverse, where they are retrofitted around the development. Design standards are also important to ensure that walking, wheeling and cycling routes are of the required quality to enable and encourage sustainable trip making, so the adherence to design standard LTN 1/20 should be explicit in the SPD. Fully compliant facilities should be provided and no departures from standard should be permitted.

Within Figure 9 the section of Shenley Road between Coddimoor Lane and the farmstead to the southeast appears to be retained for local vehicular access. Separation of vehicles, particularly large agricultural vehicles, from cyclists and pedestrians needs to be provided. This is not obvious from the proposals. This section of Shenley Road and the section further to the southeast is also potentially retained as a connection between Whaddon and Milton Keynes / A421. The presence of a parallel Bridleway is noted; however, the decision on Shenley Road would surely affect the need for this and this needs to be reflected in the SPD

Two options are presented for more direct vehicle connections to Whaddon (Figure 18) or less direct (Figure 17). The less direct option has the greatest potential to deliver a change in mode away from the car but there is no obvious support for non-car modes in and through Whaddon. Without complementary measures in Whaddon, the less direct option for vehicular traffic will simply add to vehicle journey lengths and reduce the sustainability of the proposals.

Figure 20 does not include the interface between Whaddon and Shenley Park as a key connection. This is a crucial element in providing suitable non-vehicular connections with a new Redway, new Bridleway and two existing Bridleways all converging here. The appropriate treatment of Shenley Road in this location is crucial.

It is recommended that an Active Travel Assessment be required of applicants as a component of the Transport Assessment, to ensure that a thorough and evidenced audit of active travel infrastructure (including onward connections outside of the SPD area) is undertaken and a package of necessary and desirable improvements to these routes and

nodes identified. Ideally these external improvements deemed necessary should be funded through planning obligations.

To ensure the level of internal sustainable movement that is aspired to in the SPD, it is recommended that a Healthy Streets design ethos is applied in the design of internal streets in the development area. The Healthy Street approach will ensure that the streets in the development will be people-focussed and will encourage their use by all members of the future community.

In order to prevent developers giving lip service to these aspirations, it is also suggested that travel plan obligations are considered for the SPD area, to ensure that steps are taken to achieve desired levels of sustainable travel and that monitoring is required. Failure to meet prescribed travel plan targets should trigger additional funded mitigations secured through the S106 process to improve mode shares for public transport and active travel.

Public transport

Car dependency should be discouraged through policy (parking provision) and through mitigation measures – such as car club provision secured via S106. This would provide some future residents with an option to not own a car, or for two car families to own only one. Car clubs also address exclusion in communities.

The requirements of sustainable transport should not be overlooked when it comes to individual residential unit design. The provision of internal secure cycle parking in residential blocks is essential, but instead of this being a communal area within buildings (often in basements), this should be considered on an individual unit basis (bicycle cupboards)

It is acknowledged that car ownership will likely be high in the SPD area, so the transition to ZEV's should be encouraged by requiring the provision of a proportion of electric charging infrastructure in parking areas.

Public Transport provision will be critical to ensuring car-dependence for longer journeys does not become established, so public transport services must not only be supported through S106 contributions initially, they must also be introduced alongside occupation – not afterwards, when travel behaviours will have already become established. The timing of S106 contributions for public transport is therefore critical.

Design for public transport is also critical. Public transport corridors will require some degree of elevated density to be viable, and it should be the developer's responsibility to design their scheme for a successful public transport service, rather than to try to retrofit a bus service to a layout developed in isolation. Bus only access, bus priority and other means of favouring public transport over private vehicles should all be encouraged in the SPD, to maximise the potential for public transport patronage and to ensure a viable service longer term.

Public transport services, how connections to destinations are achieved, and what service amendments to serve the SPD area will be required will be a critical component of the

Transport Assessment and the involvement of neighbouring authorities in this aspect is essential, as cross-boundary trip making will occur.

This development area may be one that could be served by a future MK MRT system, should such a scheme proceed, although the routes of any future MRT services are still to be determined. MRT must not, therefore, be considered as a public transport 'silver bullet' for this site, that will deliver high levels of development sustainability. Sustainability and how movement happens is also a design matter, and a car-focussed development that is impermeable to pedestrians but is served by a MRT system will not deliver on the SPD movement outcomes.

Vehicular movement

Given that there is no certainty of a future additional through-route connection between H6 and A421, due to the nature of housing adjacent to the H6 grid road reserve, the proposals need to ensure adequate connections can be made within the land available and through appropriate interventions to the A421 to accommodate additional strategic movement along this route into and out of Milton Keynes.

In this regard, Figure 9 shows a strip of land safeguarded for future A421 improvements but this strip is visibly narrower than the proposed 40m or 60m strips within the site for a potential grid road connection through the site. We are concerned that the supporting evidence for the SPD does not explain what work has been done to establish that the reservation for A421 upgrades is adequate to allow the required upgrading of this regionally strategic route. The existing Bottledump Roundabout and adjoining underpass are constraints to movement and both would need improvement to accommodate A421 upgrades. We are concerned that the SPD makes no mention of the safeguarding of land for these works.

Education

As noted in our objection to the proposed allocation of Shenley Park via Policy D-WHA001, all schools in Milton Keynes bar one Primary School are currently full (the site borders The Hazeley Liaison Group area, which contains three Primary Schools and one Secondary School). With further development still coming forward at Tattenhoe Park and Kingsmead South, it is not anticipated there will be any capacity to accommodate demand from this development. We note the inclusions of a 2FE primary school to be provided on site, in line with Policy D-WHA001. However, we maintain our concerns that the assessment of pupil yield for this site, which adjoins Milton Keynes, underestimates the education demand this development will create compared to our own evidenced assessment of pupil yield for similar developments over recent years adjoining Milton Keynes within our administrative boundary. The impact of this development on the early years, post 16 and SEN sector is also not adequately addressed in the SPD. Notwithstanding this, we maintain our position that pupil demand from this development should be accommodated within the site or elsewhere in Buckinghamshire. We therefore object to the reference in Part Eight of the SPD that per

pupil cost be paid to Buckinghamshire Council for the use of Buckinghamshire Council or MKCC for secondary school and SEN provision. All education provision should be met within Buckinghamshire without recourse to schools within Milton Keynes.

Health

Similar to education provision, the SPD and supporting evidence does not provide clarity on a preferred approach to health infrastructure provisions. There is a suggestion in Part Eight of the SPD that discussions with the Integrated Care Board (ICB) (primary care) and Bucks Healthcare Trust (BHT) have taken place, but this is not clear. No reference is made of Milton Keynes University Hospital NHS Foundation Trust or to contributions to the hospital which clearly provides the closest secondary care to the site, which is a worrying omission from the SPD. As such, it is not clear as to how responsibility and funding for health infrastructure will be apportioned, what form the mechanisms for apportioning monies will take, and whether there is scope for providing cross-border benefits for the residents of Milton Keynes.

Green infrastructure

We appreciate the landscape-led approach to design and the clarity provided regarding the extension to Tattenhoe Valley Park. Engagement with the Parks Trust also exemplifies due consideration for the management of green infrastructure, specifically with regard to Tattenhoe Valley Park. Similarly the 'enhancement and connectivity, amenity open space provision, habitat creation and SuDS provision for the development' is also in line with the requirements of Policy SD15