



5th December 2025

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CONSULTATION RESPONSE: 23/02180/AOP and 23/01610/OUT - MKCC
Amended plans for Shenley Park, Shenley Road, Whaddon, Buckinghamshire

1) Summary

Whaddon Parish Council (WPC) thanks Buckinghamshire Council (BC) for the opportunity to comment. We expect our concerns to be addressed in any Officers Report to the Strategic Sites Planning Committee.

There should be more detailed engagement on this application and its impacts, particularly regarding traffic and the infrastructure improvements needed to make the development acceptable in planning terms. Unless the points i, ii, iii, v, vi and vii in Section 4 below are properly addressed, WPC believes the application should be rejected, and therefore strongly 'OPPOSES' it.

We also do not believe the application can be supported until there is more accurate traffic modelling. Our concerns on this are outlined in Section 5 and further analysis of traffic modelling has been uploaded as a separate document.

2) Consultation

As long ago as 23rd May 2022, and before consultants David Lock Associates were appointed by BC to undertake the design and production of the Supplementary Planning Document (SPD), WPC detailed a '7 point wish list' by letter sent to the Shenley Park lead officers and department heads at BC outlining our concerns and requesting discussions between WPC, Whaddon residents and BC to ensure that statutory tests of lawfulness and policy within the NPPF were met. Assurances were given by both BC Cabinet and Full Council that meaningful consultation would occur, but our efforts to gain meaningful discussion have mainly fallen on deaf ears and little if no progress has been made in achieving benefits for Whaddon. Indeed, requests to hold talks with BC to discuss these matters have been thwarted by the lack of detailed and understandable traffic information upon which village concerns can be sensibly understood and mitigated.

Not one of the recipients who were sent the 23rd May 2022 letter (Morris; Meacham; Marsh; Winkles & Thornton) were on the circulation list of the most recent response dated 7th October 2025 from Clare Gray to WPC, in answer to the 34 questions we raised on 4th April 2025. The 2025 recipients of this response were Martin; Broom; Broadbent; Strachan; Bayley & Duncan. WPC would like confirmation that these officers and members are aware of the May 2022 letter, and have carefully considered its content?

Paragraph no 4. in the May 2022 letter relates to the Shenley Road Closure. It is difficult to accept BC's response to questions 1 & 2 (asked in the 4th April 2025 letter), when although WPC's initial conditional preference was to close off Shenley Road, the letter clearly stated *"This proposal may provoke differing reactions from those currently using Shenley Road(both in Whaddon, Nash and Milton Keynes) and will need further careful and detailed discussion/consultation when the land use and highway/traffic dispersal plans evolve through the SPD process, enabling the bigger picture to become clearer. And allowing the constraints and opportunities to be properly debated."*

BC's answer acknowledges that such proper consultation did not occur through the SPD process. BC states that 'emerging thinking connectivity scenarios' were published as part of the consultation material, and that this did not stop people who did not want the road stopped from saying so. Such was the volume and complexity of the material that this Council wanted – and still wants – clear options, supported by understandable traffic data, to be debated by those who will be most impacted by the changes.

This is why – together with other highway failings and lack of improved village safety measures via S.106 improvements (para 3 in the May 2022 letter) – WPC withdrew its support for the closure of Shenley Road by letter sent on 23rd October 2025 until such time as proper consultation on the available options has been properly undertaken, and that residents have the traffic implications clearly explained to them.

WPC is also concerned and very disappointed, that despite requesting several times that this important letter from a statutory consultee be uploaded onto the BC planning portal for this development, it has still not appeared. WPC asks “Why not?”

3) Re-application

WPC would like to comment on two changes by Crest Nicholson (CN):

“The proposed building height for the Local Centre has been reduced to three storeys. This change ensures alignment with the adopted Supplementary Planning Document.”

WPC Response: It is interesting that CN implement building height reduction to ensure ‘alignment with the SPD’ but is not prepared to comply with the SPD on more important issues such as the underpass (or green bridge) where the link road severs the important North Bucks Bridleway and wildlife corridor, nor – WPC understands - have they entered into any proper discussion with Homes England, a Government Department tasked to ensure and assist in the provision of sustainable development – to try to secure and provide the Hayton Way public transport connection. This selective approach is unacceptable, and WPC firmly believe that required SPD principles should be complied with regardless of any financial constraint.

“Proposed development in the southwest parcel has been removed from the masterplan reflecting on updated spatial strategy and stakeholder feedback”

WPC Response: WPC and others need to know, as it is part of this planning application, what the future use of this area is likely to be. There has been much talk (and it’s repeated in the emerging MK City Plan 2050) of a ‘park and ride’ site along this part of the A421 to intercept traffic heading to CMK. If this is part of the ‘spatial strategy’ then this should be made clear now, before planning is granted, as it will have further impacts (possibly beneficial) on the A421 improvement discussions.

4) WPC request for measures

For the avoidance of doubt, and as we are yet to receive confirmation that the present team of BC Officers have seen WPC’s May 2022 letter, we reiterate the traffic and highway measures necessary to mitigate this otherwise unacceptable development. These are described in more detail in our May 2022 letter.

- i. Upgrade existing Whaddon Village traffic calming scheme
- ii. HGV restriction
- iii. Existing S106 commitments arising from the Salden Chase development
- iv. Shenley Road Closure – *this position is superseded by our letter sent 23 October 2025*
- v. Coddimoor Lane improvements
- vi. Immediate and future A421 dualling
- vii. MK link road enclosing Shenley Park (nature of)

5) Traffic modelling

We welcome BC's assurance that "*We will ensure that the Highways response to the application will be set out clearly and logically*", as emailed to WPC by Clare Gray on 20th November 2025.

We have the following questions about the traffic modelling:

- a) Has the 2023 MKMMM model been validated and if so, why have the associated reports not been made available to allow the Shenley Park application to be reviewed?
- b) Have Bucks Highways run the Junctions models in Lane Simulation mode as recommended by TRL, MKCC and BC during the Salden Chase appeal?
- c) We are told traffic plans will reduce traffic. Can BC confirm it will provide evidence from its own monitoring to support the levels claimed and if this is not possible, inform applicants that they cannot rely on the travel plan to reduce the traffic levels?
- d) Given that the usual method of defining the dispersion of traffic is based on 2011 Census data, when much of the western side of MK was not fully developed, when will the council request ANPR surveys for more accurate source-destination data for use in planning applications. 14-year-old traffic data would be turned down as not recent enough yet it appears to be accepted as the norm in this case. Given the costs are low compared to the total development, this seems to be a reasonable way forward.
- e) CN claims that the MKMMM was calibrated using its traffic surveys and queueing data from March 2023. The queueing data has never been published nor any explanation of how the calibration was carried out. The Shenley Park data consisted of a single day of manual counts with ATC reading on some arms taken at over 600m from the concerned junction. This is not compliant with the minimum specified in the May 2024 TAG UNIT M1.2 paragraphs 4.3.11 and 12 is for 1-day manual count with 14 days ATC readings for either individual turns or junction entry and exit arms. Why is a planning decision being made on non-TAG compliant models?

We have also uploaded a detailed analysis, which has been prepared by an expert, Steve Heath.

6) Responses to questions raised in April 2025

We comment below on BC's answers to the 34 questions we asked on 4th April 2025.

The unsatisfactory, questioned and unanswered questions remain relevant, and form part of this re-application submission consultation response.

Q1 and Q2 – Relating to the proposed closure of Shenley Road

WPC does not accept BC's explanation. The meetings with WPC and some residents that BC refers to were based on insufficient and unreliable traffic data and out of date traffic models, and concerns relating to the impact on highway/footpath safety and worsening through village traffic levels were countered by BC with assurances that these issues would be properly addressed – which to date they have not been. Amendments have been made to address resident concerns in MKCC, but little or no progress has been made for those impacted in Bucks. Since these conversations, the dualling of part of the A421 has been abandoned in exchange for 'tinkering' at roundabouts and junctions, which will not solve the increasing traffic problems; the proposed traffic calming along Coddimoor Lane will be ineffective and serve no useful purpose; speed limitations, redesign and a pelican crossing will hamper the expectation that the link road will divert at least 35% of eastbound traffic off the A421; and S106 discussions with WPC and residents about how this development will improve safety, speeds and traffic volumes within Whaddon have been ignored. For these reasons WPC has withdrawn our

conditional support for the closure of Shenley Road, until proper and full public consultation has been undertaken. BC states “*Any decision on the planning application will be informed by the evidence submitted as part of this application*”. It is important that before this application is considered in Committee, Members are fully apprised of residents’ concerns and the lack of proper consultation.

Q3

BC has not mentioned ‘*taking account of all future scenarios*’, a statement which remains in the NPPF, and is an important factor taking account the additional housing outlined in BC’s emerging Local Plan. BC also mention that “*no position or opinion can be formed without prejudicing the outcome of the assessment*”. WPC understands this, which is why before any final decisions are taken, the recent ‘assessments’ must be explained to Whaddon residents at a public meeting so that they can fully understand the impacts and mitigations. WPC believe that until the revised traffic data and traffic models are guaranteed accurate and are deemed acceptable then the development remains ‘unacceptable’ in NPPF terms.

Q4

Whilst understanding BC’s answers to a), b), c) & d), it remains imperative that BC clarifies, by way of a village meeting, the traffic implications of this development, and the likely impact on the safety and wellbeing of Whaddon residents. BC should then liaise with WPC to determine the mitigation required to make the development acceptable in planning terms. The fact that existing village concerns and traffic problems are not necessarily caused by this development alone is immaterial, because such problems do exist now, and if this development is likely to worsen or aggravate the current situation, the village should benefit by S106 improvements.

Q5

BC states responses have been invited on this issue, but many comments from residents, suggest that consultation replies have not been made, simply because they remain in the dark about possible options and the implications of closing Shenley Road or not, and are waiting for the final traffic impact assessment figures, and how these will impact on traffic levels and safety through Whaddon village.

Q6

Understood.

Q7

WPC and residents should receive from the Highways Department a village meeting to explain how they arrive at the decisions they have, bearing in mind the concerns that exist over the accuracy and legitimacy of the CN submitted traffic data and traffic impact assessment. What tests has Highways implemented to ensure the accuracy or otherwise of this information?

Q8

BC’s summary is accepted, because WPC monitored and followed the Salden Park Public Inquiry appeal process. The point here however is that the link road within the sensitivity test assumed that it would be a Milton Keynes grid road. It is now clear that this is not the case, and that because of MKCC and MK resident objection, this road has been downgraded to a link road, with traffic speeds considerably lower than that along MK grid roads, including a winding 30mph

section through a lengthy MK residential area, together with a pelican crossing. Therefore, BC's assumption of 35% diversion of traffic of the A421 is highly unlikely, leading to unacceptable congestion along the A421 and the pinch point roundabouts in both authority areas. How this problem will be overcome is yet to be explained, but WPC and residents are concerned that it is highly likely to lead to more traffic and short-cutting problems through Whaddon.

Q9

Once the '*number of forms*' that '*the robust assessments of the impacts*' that BC refer to are completed and understood by BC and WPC, councillors look forward to removing the speculation about possible forms of mitigation and holding the S106 discussions that have been requested. These important issues must be resolved and agreed at an early date with CN so that they are enshrined in enforceable planning conditions.

Q10

BC states that any mitigation, when understanding the full implications of the development are known will 'most likely' be resolved 'prior to determination'. WPC repeats that any mitigation measures must be legally agreed and committed to, prior to determination, as to agree them thereafter will be very difficult to achieve.

Q11

BC clearly recognises that unacceptable impacts will occur, when the link road severs such an important and historic bridleway, that already is and has the potential to be an even better and well used green corridor along and through this whole area. The SPD is very specific, and its wording reinforces the need to segregate motorised traffic from all other prioritised modes of transport, and the need to ensure that continuous links for leisure routes and important wildlife corridors are not interrupted.

There are technical and landscape difficulties to overcome, but CN is forced to cross the Tattenhoe Brook watercourse that runs along the Tattenhoe Valley Park, with a substantial bridge and ramparts, and a very disruptive and potentially dangerous Pelican crossing – especially as the North Bucks Way usage will increase as the area develops – and this should not replace what is required in the adopted SPD. Have the applicants been asked to justify their apparent objections to an underpass or green over-bridge, or requested to move the crossing slightly southwest, where the topography would be more accommodating, even if this does mean a slight diversion of the North Bucks Bridleway perhaps running through the eastern edge of the Briary Plantation?

Q12

Please see the response to Q11.

Q13

Please see the response to Q11. It is rare that technical problems cannot be overcome, even if solutions come at an increased cost. Better that these problems are resolved now, rather than in future years when the cheaper alternative Pelican crossing is found to be unfit for purpose, an impediment for traffic flow or worse still dangerous. At this point a costly solution will be the responsibility of BC or MKCC or both, which is not acceptable because ratepayers will ultimately need to fund the improvements that should have been installed initially, by the developers in accordance with the approved SPD.

Q14

The provision of the Hayton Way public transport corridor is a strong requirement of the SPD and is stated as a preferred solution. An alternative that puts more busses onto the A421, and does not make the required connections with the Westcroft District Centre is not only an unacceptable departure from the SPD, but also cannot be guaranteed to prevail when future routes will be at the mercy of private operators, once their initial service obligation has been fulfilled. This will impact those who rely on a good and efficient public transport system – which BC and its consultants David Lock Associates correctly required and planned for within the SPD. WPC disagrees with BC; it is essential that someone – preferably CN – engages properly with Homes England to ensure the necessary public transport in the SPD is complied with.

Q15

WPC understands that Hayton Way was never designed to be general access. We disagree that it is premature to consider detailed public transport routes. This was carefully considered through the SPD process, and BC should ensure that preferred public transport policy is met. It was known that the required land was outside the control of the applicants. It is wrong to ignore the issue now simply because CN will not agree financial terms with Homes England. Homes England have assured WPC that they would be willing and fair minded participants, especially as their function is to support, encourage and help enable sustainable development to be achieved.

Q16

Please see the response to Q15. It may not be appropriate to disclose discussions between BC, MKCC, the applicant, and the public transport commercial operator, but WPC has been in touch with Homes England who is willing to help ensure that the SPD is complied with, and the preferred public transport route achieved. Residents deserve to know why the SPD has not been complied with if an inferior and non-guaranteed longevity public transport system is pursued.

Q17 & Q18

BC has avoided answering this question, and WPC would like to understand why the applicants made such a claim, when it is clearly the applicant's responsibility to endeavour to achieve the optimum aims of the SPD, and to ensure they are incorporated within a development of this Importance.

Q19

What will the solution be if the outer link road does not 'allow the requisite degree of capacity for through traffic' – specifically 35% of eastbound A421 traffic, and how will this be monitored?

Q20

WPC understands the selection process, and how the Shenley Park site was chosen but that was not the question asked. The question was "did BC fully understand and take this MKCC policy into account prior to the three sites being chosen for evaluation, especially the traffic and transport/highway significance of each site?"

Q21

It seems illogical, if true, that the allocation of Shenley Park was considered in the A421 Study, but the access was not – simply because the scheme is not yet determined. Surely one dictates that the other is equally important. As mentioned previously WPC and residents look forward to having the latest transport assessment explained to them in order to understand the '*developments impacts and interaction with the A421*'.

Q22

WPC does not understand BC's response. If the application must fully assess its own impacts and those of committed developments in a cumulative assessment, surely the developments impact – and that of the link road – must be a concern, and traffic flows to and from 1250 new homes, must be relevant?

Q23

A name change to Wheat Hill Park, should the development proceed, will occur when the postal addresses and individual street names are chosen.

Q24 & 25

The Construction Traffic Management Plan (CTMP) will be crucial and impact residents in both BC and MKCC, as well as surrounding areas. Any agreements, diversions etc. whilst any A421 works are undertaken must be known well in advance of works. WPC believes that due to its importance, details of the CTMP and any s278 agreement must be legally agreed and consulted upon before a planning decision is taken, and not left as a condition to be agreed before the actual commencement of the development.

Q26

Please see the response to Q 24/25. The BC answer notes that whilst delivering vehicles are under the contract of the developer and their approach routes can be controlled by a CTMP, once they leave the site that control ends. This is one reason why, within WPC's letter of May 2022, councillors requested that BC considers introducing an HGV restriction along Coddimore Lane and through the village. Our request has not yet been addressed.

Q27

It appears that concerns about structural planting are being addressed.

Q28

Noted.

Q29

It is very obvious that 'long term defensible edge' is misleading, and the phrase should be withdrawn from documents relating to this site. In planning terms, 'Long-term' is the process of setting strategic goals that span typically 3 to 5 years and possibly longer. Alternatively, it would be clearer to use 'short-term' which covers 1 to 2 years – which is the likely time span for adoption of the new Local Plan for Bucks. To most people, defensible means having the ability to successfully protect or support such an area, either physically or by argument. Transparency in planning documentation is crucial unless the intention is to purposely mislead residents living within close proximity.

Q30

We have mentioned this point earlier in this response, and like BC, WPC awaits clarity on the future use of this south-west parcel of land.

Q31

Understood, but WPC awaits any decision in respect of a possible 'park and ride' site, and expect this to be consulted on before any acceptance is acknowledged.

Q32

WPC understands but expect BC to involve WPC in discussions with CN on necessary and deliverable S106 improvements prior to determination of this application.

Q33

Understood, but once again WPC awaits to have evidenced impacts explained once the transport assessment and all other data collection and traffic models have been properly upgraded, tested and approved.

Q34

WPC support the Parks Trust (PT) undertaking stewardship of the green spaces, but in the event that negotiations falter WPC would like to be considered as an alternative custodian, rather than having a private management company in charge.

Further, we note that PT's recent response asks the question who will do it and how it will be funded. This is an important topic, and we ask that this matter must be resolved before any planning approval is considered and must not be left as a planning condition 'to be resolved before commencement of development'.

7) Conclusion

In conclusion, WPC retains the right to submit further comments, following any further consultation responses that appear on the BC planning portal, or should any further amendments be submitted by the developer.

WPC and residents also expect to be consulted further once all traffic monitoring has concluded, a final traffic impact assessment has been submitted, and alternative proposals for the Shenley Road have been fully explained, understood and debated, after which further consultation responses will be submitted to BC.

All responses submitted by WPC will be expected to be fully addressed and answered within any officer's recommendation, prior to the development being considered by the Strategic Sites Planning Committee, and as and when any committee meeting is held WPC has already stated its desire to address members, with appropriate time being allowed to do so properly and fully.

Thank you again, for considering this response that WPC hopes and expects to be dealt with fully and carefully.

Yours sincerely

Suzanne Lindsey

Clerk & RFO Whaddon Parish Council