SUBMISSION STATEMENT

MATTER 5: TRANSPORT

MATTER 7: OTHER AREAS OF CHANGE, SUSTAINABLE CONSTRUCTION, COMMUNITY ENERGY NETWORKS AND RENEWABLE ENERGY

MATTER 8: DELIVERING INFRASTRUCTURE, MONITORING AND MANAGING

ON BEHALF OF
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1. **INTRODUCTION**

1.1 This submission statement has been prepared by Januarys on behalf of the South West Milton Keynes (SWMK) Consortium. This Statement sets out our response to the questions identified by the Inspector appointed to examine the Milton Keynes Core Strategy for Matters 5, 7 and 8.

1.2 Two further statements have also been prepared, for Matter 1: Overview and Matter 3: Overall Housing Provision. The statement for Matter 1 (Appendix 1) explains the history and background to the proposed Strategic Development Area at South West Milton Keynes.

1.3 The SWMK Consortium comprises the following development companies; Hallam Land Management Ltd, William Davis Ltd, Taylor Wimpey Developments UK Ltd, Connolly Homes and Bellcross Homes. The Consortium control land to the south west of Milton Keynes, south of the A421 and north of the line of the proposed Oxford to Cambridge railway line.
2. MATTER 5 - TRANSPORT

**Issues**

5.1 Is the Core Strategy based on a sound assessment of the transport needs of the Borough and its hinterland? In particular, i) Is there sufficient clarity about the transport implications of the Core Strategy and the post-submission proposal for a Strategic Land Allocation to the south east of the city? ii) How does the spatial framework and policy content of the Core Strategy relate to the local transport plan (LTP3)?

2.1 Policy CS11 seeks to deliver a well-connected Milton Keynes, and identifies the priority transport schemes. We have no specific comments on the policy content. However, it would be helpful if the supporting text explained the relationship between the delivery of transport infrastructure and the development required to fund it. It should also clearly state the relationship between development outside but adjacent to Milton Keynes and the delivery of transport infrastructure within and on the edge of Milton Keynes. It is clear that development in neighbouring authority areas will be required to contribute towards funding the delivery of transport infrastructure. It is also the case that development will be required to support some of the public transport improvements as they will be generating future users of those facilities. In this regard, the supporting text to Policy CS11 should include positive commitment to development in SWMK so that transport improvements can be delivered both within and on the edge of Milton Keynes. We suggest the following changes to Paragraph 11.25.

*Paragraph 11.25 – Suggested Changes*

“The relationship between growth and sustainable transport is a complex one and key to the successful development of Milton Keynes. There is also a strong relationship between the funding and delivery of transport infrastructure and development. It is likely that public transport and highway improvements will only be viable if associated with and at least in part funded by, development. For example, the East-West Rail Link will only be delivered if associated with development in the south west of Milton Keynes. The Council will work with neighbouring...
2.2 Policy CS6 also defines the manner in which place-shaping principles must be used for Sustainable Urban Extensions in adjacent local authorities. The following addition is suggested for paragraph 6.14

**Paragraph 6.14 – Suggested Addition**

“New internal links should be considered wherever possible to integrate seamlessly with the existing road system such as ‘V0’ links. In addition, relief roads such as the Bletchley Southern Bypass must be considered alongside new ‘Park & Ride’ facilities close to potential development sites in order to help capture inbound trips around the City’s periphery”

5.2 Does the Core Strategy set out an integrated and achievable strategy for transport? In particular, i) Are the priority schemes identified and are there adequate mechanisms for their implementation? ii) Is it clear how the relative priorities for car-based and other modes of transport will be reconciled? iii) Is the aim (Vision, page 17) to reduce peak hour commuting by car from 68% to 57% by 2026 clearly defined and achievable, and if so, is it sufficiently ambitious? iv) Is the commitment to expansion of the grid road system justified? v) What is the status of the park and ride proposals?

2.3 We suggest that the list of priority schemes identified in Paragraph 11.15 includes an extension to the V0 Link Road to Bottledump Roundabout at Tattenhoe Park. There are benefits associated with this link road scheme, both to disperse traffic from the A421 and to enhance accessibility for both public and private transport. This would improve traffic conditions in the local area and provide additional highway capacity in South West Milton Keynes. The new V0 link will also be key in establishing the proposed Public Transport Spine to link and integrate nearby developments in the north with the SWMK development. This scheme could be delivered in association with development. We suggest the following changes to Paragraph 11.15.

**Appendix 1** contains a plan of the potential route of the V0 Link Road to Bottledump Roundabout.

**Paragraph 11.15 – Suggested Changes**
“The priority schemes are:

7. **V0 link road at Bottledump Roundabout.**

2.4 Policy CS11 provides a list of high quality transport interchange schemes. The list includes a proposed A421 (West) Park and Ride with East-West Rail. Paragraph 11.6 provides a summary of the rationale for park and ride; to reduce the number of private car journeys into Central Milton Keynes. We suggest that Paragraph 11.6 could provide more specific guidance on the siting of park and ride facilities i.e. on the correct side of the road for incoming traffic. In the case of South West Milton Keynes a park and ride facility, if required, should be located on the northern side of the A421. This would involve land outside the control of the SWMKC. We suggest the following changes to Paragraph 11.6.

**Paragraph 11.6 – Suggested Changes**

“...‘Park and Ride’ and interchange facilities on the edge of the city and an improved transport interchange at the Central Milton Keynes rail station should aim to reduce the number of private car journeys into Central Milton Keynes. **Park and ride facilities should be sited on the correct side of the road for convenient and attractive access for inbound traffic.** This is currently under review through the preparation of the Local Transport Plan (LPT3).”

2.5 We support the delivery of the western section of the East-West rail link. However, delivery of this public transport scheme will require development, both within and on the edge of Milton Keynes, to partially fund it. If the East-West rail link is to be successful it will need to be accessible for both existing and planned new communities. The East-West rail link passes through South West Milton Keynes which makes this a suitable location to link housing with public transport. However, to enable this to happen will require agreement from Aylesbury Vale District Council that land at South West Milton Keynes, within Aylesbury Vale, is an appropriate location for housing development which is well-related to employment opportunities and which supports
objectives to encourage public transport usage. The alternative to providing
development at South West Milton Keynes would be development elsewhere
in Aylesbury Vale at locations which will not necessarily support the delivery
of the East-West rail link.

2.6 To facilitate integration between car-based and other modes of transport,
CS11 identifies the need to develop viable alternatives to the car. In case of
the SWMK development a step change in public transport provision, greater
choice for car owners and the introduction of multi modal demand
management and phasing of development will enable a balanced
development to be achieved. Bus penetration, provision of bus priority at key
locations and Real Time Travel Information Systems (RTTI) will ensure that
this is achieved. In addition the development of a high quality Public
Transport Spine linking to the Western Expansion Area development will
ensure that the two development areas are linked by a reliable public
transport network. In line with this, consideration will be given to a public
transport (PT) solution integrated with priority information systems with the
ability to implement strategies to provide real time PT or bus priority facilities
at traffic signal installations.

2.7 Additionally, the implementation of a demand responsive travel arrangement
service within the development will add further sustainable travel choice for
car owners. Providing a more personalised service than do buses, this
concept will enable car drivers to utilise a local taxi service, but share the cost
with other local residents travelling to the same or near destinations. A
development focus in terms of transport shall be on the overall efficiency of
the network; better information to drivers along the vehicle corridors or
congestion areas, journey times, bus services, and alternative routes. The
measures outlined above in combination with other interventions proposed
for the development will help the CS achieve its stated ‘Vision’ to reduce
peak hour commuting by car; in order that it can be considered robust. In the light of this strengthening of the Policy, the following text is suggested for addition to Paragraph 11.21.

**Paragraph 11.21 – Suggested Changes**

“Place checks will identify local transport needs in priority regeneration areas. **Opportunity exists for new developments and neighbourhoods to enhance and implement the use of technology, thereby promoting the efficiency of the network and the smarter choices agenda; and in bolstering the overall sustainable strategy delivery objectives for such developments, alongside network improvements.**”

5.3 i) **To what extent does the strategy depend on infrastructure development outside the Borough and are there mechanisms in place to secure delivery?** ii) **What weight should be attached to the proposed East-West rail link?** iii) **What is the status of the proposal for a new junction (J13a) on the M1 motorway?**

2.8 We consider that the delivery of infrastructure, both road improvements and new public transport provision, will require development in Aylesbury Vale, adjacent to Milton Keynes. Development will be required to be partially fund infrastructure development, and in the case of public transport to support it.

2.9 We consider that significant weight should be attached to the proposed East-West rail link. Milton Keynes Council has a long-standing ambition for the East-West rail link to be delivered. If the Council has ambitious targets to reduce peak-time commuting by car this will require improvements to other modes of transport including the rail network. However, as set out above, the delivery of the East-West rail link will require development, both within and on the edge of Milton Keynes, to partially fund it. It will also need to be
accessible for both existing and future residents and workers. The emerging Transport Strategy for SWMK is attached as Appendix 2.
3. MATTER 7 – OTHER AREAS OF CHANGE, SUSTAINABLE CONSTRUCTION, COMMUNITY ENERGY NETWORKS AND RENEWABLE ENERGY

**Issues**

7.1 *Having regard to the scale of growth expected in the Other Areas of Change, does Policy CS 8 give sufficient guidance about the planning priorities for them?*

3.1 No comments.

7.2 *Are the interrelationships between these areas and the proposals for Central Milton Keynes and the Strategic Land Allocation properly considered?*

3.2 No comments.

7.3 *Having regard to Policies CS 4 and CS 8, should the priorities for Bletchley and Wolverton town centres be set out more clearly in the Core Strategy? Is it appropriate that the development management policies DPD should set out priorities for the key centres (reference to Core Strategy paragraph 8.8)?*

3.3 No comments.

7.4 *With reference to Policy CS 14, are the standards for sustainable construction in the respective areas of the Borough and in conversion/alteration of existing buildings justified and deliverable and in keeping with national planning policy? What would be required to demonstrate technical or financial non-viability?*

3.4 No comments.

7.5 *Can financial contributions be expected to the carbon offset fund, given the statutory tests that apply to planning obligations?*

3.5 Policy CS14 expects all developments of 5 or more dwellings or 1,000sqm to make a contribution towards the Milton Keynes Carbon Offset Fund. We consider that such a contribution would not satisfy the planning obligations tests.
3.6 The carbon offset fund policy (Policy D4) was included in the Adopted Local Plan. The Inspector for the Adopted Local Plan questioned the implementation of Policy D4, and recommended changes - see Paragraph 4.4.1 to 4.4.7 of the Inspectors Report. However, the Council did not implement those changes, and the policy was adopted unaltered. It is proposed that the carbon offset fund policy is carried forward unaltered into the Core Strategy. We disagree with this approach.

3.7 There is no relationship between development and the uses to which the Carbon Offset Fund is put, and it would be contrary to the guidance contained in the NPPF to seek planning obligations in such circumstances. Paragraph 204 states:

“Planning obligations should only be sought where they meet all of the following tests:

• necessary to make the development acceptable in planning terms;
• directly related to the development; and
• fairly and reasonably related in scale and kind to the development.”

3.8 Firstly, development that is in accordance with adopted policy and in suitable locations will be acceptable in planning terms. It would be unnecessary for a planning obligation to be imposed in these circumstances. Secondly, the carbon offset fund seeks to improve the sustainability of existing development that is unrelated to the development proposed. A planning obligation should not be collected for purposes which are unrelated to the proposed development. Thirdly, there has been no assessment of the impact on the viability of development if the carbon offset fund is imposed. It would be unreasonable to collect a contribution towards the carbon offset fund if it would undermine the viability of development.
7.6 Are the requirements of Policy CS 15 justified by substantive evidence of technical and financial feasibility?

3.9 No comments.
4. MATTER 8 – DELIVERING INFRASTRUCTURE, MONITORING AND MANAGING

Issues
8.1 Taking account of the existing Milton Keynes Tariff, Local Investment Plan and the other existing and proposed mechanisms for securing the delivery of infrastructure, i) Is there reasonable certainty that the necessary infrastructure will be provided to support the timely implementation of the overall strategy? ii) Have the critical dependencies been identified and how are these being managed? iii) Is sufficient consideration given to infrastructure needs outside the Milton Keynes urban area?

4.1 The Urban Area Key Diagram (Figure 5.2) identifies the proposed route of the East-West rail link including the proposed location of the new railway station;, and the potential route for a Southern Relief Road. These infrastructure projects are located in SWMK, within Aylesbury Vale. We support the identification of these infrastructure projects. As set out above, SWMK is a suitable location for development and associated infrastructure, and could deliver and support public transport improvements which will meet wider objectives to reduce commuting by car and encourage the use of public transport. It would serve little purpose to provide a new railway station in isolation and the resulting passenger base to use it. However, delivery of these projects will require co-operation from Aylesbury Vale. We note that the emerging Vale of Aylesbury Plan does not propose to direct development to the edge of Milton Keynes or to SWMK. We disagree with this emerging strategy and have submitted representations to the Vale of Aylesbury Plan consultation in January 2012. In our opinion, the Vale of Aylesbury Plan would not meet the objectively assessed housing, employment and infrastructure needs of the area – as set out in the Matter 3 Statement. It is also not clear to us how the East-West rail link, new railway station, and the Southern Relief Road would be delivered in the absence of new development at SWMK. The delivery of these projects will require development to contribute towards their funding. Part of the rationale for the development we are promoting at SWMK is that these infrastructure
projects may be implemented within the plan period. The delivery of infrastructure projects on the edge of Milton Keynes will require joint-working arrangements and cooperation between MKC and AVDC. We have requested amendments to the Core Strategy to ensure that this happens.

8.2 How is the need for a 40,000+ stadium (paragraph 16.9) to be addressed? What is its relationship to the International Sports City concept? What are the implications for the Core Strategy and successor planning documents?

4.2 No comments.

8.3 How is implementation of the Community Infrastructure Levy expected to affect funding arrangements in the future?

4.3 It is expected that the Community Infrastructure Levy would increase the amount of funding available to deliver infrastructure projects because it is collected from most types of developments. Both large and small development will have an impact on infrastructure and will benefit from it, so it would be fairer for most types of development to contribute towards that infrastructure.

4.4 The proposed New Homes Bonus should also provide additional funding for infrastructure projects, but this will depend on what individual Councils decide to spend the money on.

8.4 With regard to effective monitoring of the Core Strategy, i) Is there a need for comprehensive definition of measurable targets and trigger points for remedial action (in addition to measures for housing delivery)? ii) Is the reliance on unspecified targets in other documents, for example the Local Transport Plan, satisfactory?

4.5 As set out in our comments on Matter 3 (Overall Housing Provision), we are concerned about the housing delivery assumptions that have been used for the Western Expansion Area. We consider that the assumed annual delivery rate is too high, and is higher than comparable housing sites elsewhere in...
Milton Keynes. If it is the case that delivery at the larger development sites is slower than expected then there should be a mechanism in place for additional sites to be brought forward, so that a continuous supply of deliverable housing sites can be maintained.
APPENDIX 1

Potential V0 Extension to Bottledump Roundabout
POTENTIAL H7 EXTENSION TO BOTTLEDUMP ROUNDABOUT

Notes:
- Potential to efficiently deliver an "H7 Extension" in the form of a City Street/Primary Street connection to a fourth arm on Bottledump Roundabout.
- No fundamental change to the land use structure that has outline consent.
- Likely not require a revised outline to be produced/considered.
- Any additional land take would be through a wider primary street cross-section.
- Improved accessibility and flexibility for both private and public transport delivered. (At both Local and South West MK levels.)

Minor change to location of playing fields may be required

Primary school and other committed infrastructure unaffected

New 4th arm to Bottledump Roundabout