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1. INTRODUCTION

1.1 This statement sets out how Milton Keynes Council has involved stakeholders and the community in the preparation of its Core Strategy. The statement shows how the consultation undertaken has satisfied the requirements of the Council’s Statement of Community Involvement (SCI, Adopted December 2006) and the Regulations in place at the time of each consultation period. This statement also fulfils the requirements of Regulations 30(1)(d) and 30(1)(e) of the Regulations.

1.2 During the preparation of the Core Strategy, the relevant regulations have been amended which means the final consultation stages (Pre-Submission Publication in February 2010 and the Revised Proposed Submission publication in October 2010) were undertaken under amended regulations changed since the previous stages. The Issues and Options, and Preferred Options stages were carried out in accordance with the Town and Country Planning (Local Development)(England) Regulations 2004 whereas the Pre-Submission Publication stage and the Revised Proposed Submission stages were carried out under the amended regulations.

1.3 This statement has been prepared to fulfil the requirements of Regulation 30(1)(d) of the 2004 Regulations (as amended). This section states that one of the documents that must be submitted to the Secretary of State is:

“(d) a statement setting out:
(i) which bodies and persons the local planning authority invited to make representations under regulation 25 [or regulation 26],
(ii) how those bodies and persons were invited to make representations under regulation 25 [or regulation 26],
(iii) a summary of the main issues raised by the representations made pursuant to regulation 25 [or regulation 26],
(iv) how any representations made pursuant to regulation 25 [or regulation 26] have been taken into account;

Extract from the Town and Country Planning (Local Development)(England) Regulations 2004 (as amended)

1.4 As a ‘submission document’, the statement must also be made available as part of the Pre/Proposed Submission Publications (under Section 27 of the 2004 Regulations (as amended)).

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1 www.milton-keynes.gov.uk/planning-policy/DisplayArticle.asp?ID=61284
2 Referred to in this statement as the 2004 Regulations
3 This refers to the Town and Country Planning (Local Development)(England) Regulations 2004, as amended in 2008 (by SI 2008/1371) and 2009 (by SI 2009/401). This is referred to in this document as the 2004 Regulations (as amended).
4 This provision was removed in the 2009 amendment. However, it has been included here as this statement refers to the consultation undertaken at the Regulation 26 (Preferred Options) stage.
1.5 As part of the submission of the Core Strategy to the Secretary of State, this statement has been expanded so it also fulfils the requirements of Regulation 30(1)(e), which states the need to submit:

\[\text{“(e) a statement setting out-}
\]
\[\quad (i) \text{if representations were made in accordance with regulation 28(2), the number of representations made and a summary of the main issues raised in those representations, or}
\]
\[\quad (ii) \text{that no such representations were made.”}
\]

Extract from the Town and Country Planning (Local Development)(England) Regulations 2004 (as amended)

1.6 This Statement of Consultation goes beyond the requirements of the regulations to include additional information to illustrate how the consultations undertaken as part of the preparation of the Core Strategy have fulfilled the requirements of the SCI, to inform the completion of the Planning Advisory Service ‘Self Assessment Toolkit’, and to help respondents during publication stages to understand the consultation processes already undertaken.

1.7 This statement considers the consultation and public and stakeholder involvement processes undertaken at the five main stages of the preparation of the Core Strategy;

– MK2031 Milton Keynes Growth Strategy, part of the background, evidence gathering stage
– Core Strategy: Issues and Options (Regulation 25 stage under the 2004 Regulations)
– Core Strategy: Preferred Options (Regulation 26 stage under the 2004 Regulations)
– Core Strategy: Pre-Submission Publication (Regulation 27 stage under the 2004 Regulations (as amended))
– Core Strategy: Revised Proposed Submission Publication (Regulation 27 stage under the 2004 Regulations (as amended))

1.8 Each of these stages are considered in turn through this statement, with appendices (where necessary) at the end of the document containing any relevant material to help illustrate the consultation that was undertaken at that time, and reporting the results and implications of the consultation responses.
2.1 The ‘MK2031’ project includes a series of documents, studies and other work undertaken to develop a Growth Strategy for Milton Keynes. The work to prepare the MK2031 Growth Strategy should be considered as part of the evidence gathering stage which led up to the Regulation 25 ‘Issues and Options’ consultation stage. The MK2031 work itself did not have to meet any statutory requirements, but it does form a major part of the background evidence and statutory process for the preparation of the Core Strategy, and helped to meet the requirements of the Milton Keynes and South Midlands Sub-Regional Strategy (2005) to look at directions of growth around Milton Keynes in partnership with the adjacent authorities. The scale of involvement this early in the Core Strategy preparation process also helps fulfil the Government’s aim for front-loading.

2.2 The MK2031 work was led by the Milton Keynes Partnership (MKP, the local delivery vehicle charged with overseeing the growth of Milton Keynes), in partnership with the local authorities for Milton Keynes, Aylesbury Vale, Mid Bedfordshire, Buckinghamshire and Bedfordshire, plus the South East of England Regional Assembly and the Government Office for the South East, and the involvement of other stakeholders throughout.

2.3 Following the endorsement of a project brief by all partners in December 2004, the following broad stages were undertaken. This information is taken from the MKP website where further detail about the MK2031 Growth Strategy can be found.

2.4 **Stage 1: Research and early consultation** - Between March and August 2005 information, comments and opinions were collected on the growth of Milton Keynes through meetings, a large seminar, letters and e-mail, newsletters, and a travelling exhibition. Topics to be included in the plan, ranging from the health of the local economy to the nature of green spaces, were identified and prioritised. A feedback report detailing the consultation events held and the outcomes of those events was published in September 2005. Draft Directions Papers covering these topics were published in September 2005. These papers raised questions to be answered through the process of developing the new Plan. They also provided the basis for “Options for Growth”.

2.5 **Stage 2: Options for Growth** - The Options set out how Milton Keynes could grow, balancing development inside the current urban area with extensions to the city into surrounding countryside. The Options were published for public consultation in November 2005 with comments requested by 12 January 2006. A stakeholder workshop held in January 2006 looked at how the growth options should be assessed in terms of impact on the existing community and to consider the sustainability of each.

2.6 A special project was devised for schools in and around Milton Keynes. Background material was provided on CD-ROM which could be used to design an ideal neighbourhood. It could also be used to test the sustainability of current neighbourhoods.

2.7 **Stage 3: Directions for growth** - The Project Team analysed the information from the consultation, evaluated the options, undertook a sustainability appraisal and looked in detail at some of the older areas of Milton Keynes to see how they might change in the future. A report providing feedback from the consultation events was published in April 2006.

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5 The idea that if strong emphasis is placed upon work at the early stages of the plan making process, later stages will run more smoothly
7 The feedback report for community engagement at Stage 1 can be viewed at [www.miltonkeynespartnership.info/DocLibrary/MK2031_Community_Engagement_Stage_1_Feedback_Report.pdf](http://www.miltonkeynespartnership.info/DocLibrary/MK2031_Community_Engagement_Stage_1_Feedback_Report.pdf)
2.8  **Stage 4: Finalising the vision** - The last stages of work on the proposed Growth Strategy (consisting of a main report and appendices dealing with transportation, land budget and employment land) were completed during May 2006. The Committee Report approved by Milton Keynes Partnership Committee on 12 June 2006 includes a report of the outcome of the focused stakeholder consultation which took place in April and May and the preliminary statement from the Peer Group Review\(^\text{10}\).

2.9  Milton Keynes Partnership Committee also agreed on 12 June 2006 to submit the Growth Strategy (including all the background reports) to Government, as an advisory document for consideration as part of the examination-in-public of the draft South East Plan.

2.10  As part of the publication of the MK2031 Growth Strategy, Milton Keynes Council and Buckinghamshire County Council, ran a consultation on the strategy between 30\(^{th}\) June and 30\(^{th}\) September 2006 in conjunction with Milton Keynes Partnership and Mid Bedfordshire District Council. As part of the consultation the following methods were used;

- Council officers attended over 50 exhibitions, public meetings, seminar groups, Parish Council meetings and Area Forums
- All residents identified as living within the ‘V7 regeneration corridor’ were written to
- A colour brochure and questionnaire was distributed to all households in Milton Keynes

2.11  Material was also made available through;

- radio adverts
- on MKWeb (allowing respondents to make comments or submit completed questionnaires online)
- a newspaper wraparound on the MK News.

2.12  A summary of the results of that consultation are included in a report prepared by independent analysts, **Ubiquus**\(^\text{11}\). Over 1,600 residents, stakeholders and organisations responded to the consultation and over 3,000 people attended exhibitions.

2.13  The MK2031 Growth Strategy work provided part of the evidence base for the future stages of the Core Strategy preparation. The Strategy developed a clear vision and objectives for the future of Milton Keynes (which has influenced the vision in the Core Strategy) and explored in detail the issues and options surrounding the location, scale, nature and delivery of growth. The comments received through the various methods of public consultation and stakeholder involvement were used alongside the responses to the Core Strategy: Issues and Options consultation (as discussed in Part 3), to inform choices made in the Core Strategy: Preferred Options document.

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3. **CORE STRATEGY: ISSUES AND OPTIONS STAGE**

3.1 The Issues and Options stage was the first statutory phase in the preparation of the Core Strategy, under Regulation 25. Consultation on the Core Strategy: Issues and Options document ran from 7\textsuperscript{th} December 2006 to the 8\textsuperscript{th} March 2007. The consultation undertaken as part of the preparation of the MK2031 Growth Strategy (see Part 2) in the lead up to the Regulation 25 stage, reflects the requirement to undertake continuous involvement at this early stage in the process.

3.2 The Core Strategy: Issues and Options document aimed to stimulate debate on what issues the Core Strategy should cover, set out some options for how those issues could be tackled and gave the opportunity to raise new issues and possible options for how to address them. While the paper considered some of the issues raised by the Growth Strategy work, it recognised the need to look at wider issues and options that had not been fully explored through the MK2031 work.

3.3 The statutory requirements at the Regulation 25 stage (under the 2004 Regulations\textsuperscript{12}) state before the local planning authority can comply with Regulation 26 (‘Preferred Options’ stage), they must consult;

\begin{flushright}
\textit{“(a) each of the specific consultation bodies to the extent that the local planning authority thinks that the proposed subject matter of the DPD affects the body; and}
\end{flushright}

\begin{flushright}
\textit{(b) such of the general consultation bodies as the local planning authority consider appropriate.”}
\end{flushright}

\textit{Extract from the Town and Country Planning (Local Development)(England) Regulations 2004}

3.4 The Statement of Community Involvement (SCI, December 2006) sets out the Council’s commitment to consultation at this stage. Section 3 of the SCI includes a table showing each of the preparation stages for a development plan document, and for each stage, the Government requirements for consultation or ‘what we must do’, and ‘what we may do on top of what is required’. For the Regulation 25 Issues and Options stage, the SCI sets out the following consultation requirements.

<table>
<thead>
<tr>
<th>Government requirements for consultation: what we must do</th>
<th>What we may do on top of what is required</th>
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<tbody>
<tr>
<td><strong>Issues and Options stage</strong></td>
<td>Consult on emerging issues and options for the development and an initial Sustainability Appraisal report with each of the ‘specific’ and ‘general’ consultation bodies listed in Section 6 (of the SCI) as relevant</td>
</tr>
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\textit{Extract from p13 of the Milton Keynes Adopted Statement of Community Involvement, December 2006}

3.5 The statutory requirements were met by sending hard copies of the consultation material to the relevant specific and general consultee bodies (see SCI, page 26 for details of those bodies), including the Issues and Options paper and a comments form (see Appendix A1). As considered desirable in the table extract above, the consultation period ran for 12 weeks between December 2006 and March 2007. During this period, many consultation events and meetings were held, and several articles were

\textsuperscript{12} The requirements of this stage were altered as part of the 2008 amendment to the regulations (SI 2008 No 1371). The original 2004 regulations were in place for the duration of the consultation period.
published through various forms of media. These consultation methods exceeded the statutory requirements for public and stakeholder involvement at this stage. The list below sets out the consultation methods that were used as part of the Core Strategy: Issues and Options stage.

3.6 Presentations were given at the following meetings and forums:

Internal/Council Meetings
- Central Milton Keynes Development Sub-Group
- Growth MK Information Session
- Local Development Framework Advisory Group
- Managers Assembly

External Meetings
- Age Concern and Milton Keynes Council of Voluntary Organisations (MKCVO)
- Area Consultative Forums
- Consultation with black and minority ethnic groups through information provided to MKCVO and the MKC Community Development Team
- Council of Faiths
- Local Strategic Partnership and Planning Task Group
- Milton Keynes Economic and Learning Partnership Board (MKELP)
- Milton Keynes Partnership workshop
- Parish Assembly
- Parish Dinner
- Rural Parishes (landscape character assessment workshops)
- Strategic Partnership Lead Officers Group (SPLOG)
- Travellers’ Forum

3.7 Press and local interest articles included:
- Consultation with young people through the Milk ‘n’ Beans website and Inform (a newsletter for head teachers), and also directly with schools through head teachers and Community Mobilisers.
- Consultation with housing tenants through the MKC Housing Forum, with articles in the bi-monthly Tenants newsletter, the Housing Resource Centre, Residents Associations, local ‘Open House’ meetings, and posters and articles sent to the four area housing offices.
- Consultation with members of the community with hearing difficulties and visual impairment through ‘Sound News’.
- Information offered in Braille and large print for those with visual impairment.
- Media advertising in LiveMK, Members’ weekly news updates, the Town and Parish Council Newsletter, and a press release in The Citizen newspaper.
- A web article on CREATE:MKSM, a website for the Milton Keynes and South Midlands sub-region which encourages good housing design.
- Articles distributed by MKCVO (Milton Keynes Council of Voluntary Organisations) and MKCLIP (Milton Keynes Community Local Infrastructure Partnership).
- Article in the MK@work newsletter.
- Information published in the Local Strategic Partnership email bulletin.

3.8 Information sources and awareness raising included:
- The consultation was promoted on the Council’s website (with the consultation document available to view and download).
- Information packs and posters were sent to libraries (with the consultation document available to view, and a supply of comments forms available).
- Information packs were set out to Parish Councils along with posters for parish notice boards.
A letter and poster were sent to CIL (Centre for Integrated Living).

Information packs were available at the Milton Keynes Community Safety Partnership roadshow events.

A display was held in the CentreMK shopping centre.

Posters displayed at the Council’s Listening Day.

Information sent to the Information Centre for Community Action (InCCA) through MKCVO.

Big Red Bus tours (guided bus tours of Milton Keynes, with a focus on areas of change and the expansion areas)

3.9 In order to satisfy the requirements of Regulation 30(1)(d) of the 2004 Regulations (as amended) a list of the bodies and individuals that were invited to make representations at Regulation 25 (Issues and Options) is included at Appendix A2. The ‘specific consultation bodies’ and parish councils were each sent a copy of the Core Strategy: Issues and Options document, with the comments form shown here in Appendix A1. To the remaining consultees on the list (including General Consultation Bodies and Other Consultees, as described in the SCI page 26), a letter was sent making them aware of the consultation and where documents were available to view and download, with hard copies available from the Council. Samples of these letters are shown in Appendices A3 (specific consultation bodies) and A4 (general and other consultation bodies).

3.10 One of the matters raised in the SCI extract above is the use of an Equalities Audit to consider appropriate consultation methods for hard to reach groups. A copy of the Equalities Audit is included in Appendix A5.

3.11 A summary of the responses received to the Issues and Options consultation is included in Appendix A6, which formed a report to the Local Development Framework Advisory Group on 20th June 2007. The layout of the report follows the format that was used in the Core Strategy: Preferred Options document, and it is clear from this how the responses to the Issues and Options consultation were used in the development of that document.
4 CORE STRATEGY: PREFERRED OPTIONS STAGE

4.1 The Core Strategy: Preferred Options consultation stage ran for a six week period between 27th September and 8th November 2007. The purpose of this stage is to provide a formal opportunity for local communities and stakeholders to comment on the Council’s suggested policy directions. The Core Strategy: Preferred Options document did not state the precise wording of policies: instead it set the strategic direction the Council is taking on various issues that would be shaped into the final policy wording for the Core Strategy: Pre-Submission Version.

4.2 The consultation at the Preferred Options stage was undertaken in accordance with Regulation 26 of the 2004 Regulations. The extract from those regulations is set out below. Under the 2008 amendment to those regulations (the Town and Country Planning (Local Development)(England) (Amendment) Regulations 2008), the ‘preferred options’ stage was in effect combined with Regulation 25 to cover all public participation in the preparation of a development plan document prior to the publication stage. Future development plan documents will therefore be prepared in accordance with the amended regulations.

“Pre-submission public participation
26. Before a local planning authority prepare and submit a DPD to the Secretary of State they must-
(a) make copies of the pre-submission proposals documents and a statement of the proposals matters available for inspection during normal office hours-
(i) at their principal office, and
(ii) at such other places within their area as the authority consider appropriate;
(b) publish on their website-
(i) the pre-submission proposals documents,
(ii) the proposals matters,
(iii) a statement of the fact that the pre-submission proposals documents are available for inspection and the places and times at which they can be inspected;
(c) send to the DPD bodies-
(i) the authority’s proposals for a DPD,
(ii) such supporting documents as being relevant to the body to which the documents are being sent,
(iii) notice of the proposals matters,
(iv) the statement in paragraph (b)(iii); and
(d) give notice by local advertisement of-
(i) the proposals matters,
(ii) the fact that the pre-submission proposals documents are available for inspection and the places and times at which they can be inspected.”

Extract from the Town and Country Planning (Local Development)(England) Regulations 2004

4.3 These regulations were interpreted in the Statement of Community Involvement through the table below, setting out the Government requirements and any additional methods that may be employed.
Government requirements for consultation: what we must do | What we may do on top of what is required
---|---
Preferred Options Stage | – Make the preferred options document and the formal Sustainability Appraisal report available for inspection in the Council’s Offices and other appropriate places.  
– Publish document on council website  
– Send document to the consultees from the previous stage  
– Place an advertisement in local newspaper telling people that the document is available and they have 6 weeks to send in their comments | – Notify and invite comments from all people commenting at the earlier stages of plan preparation.  
– Consider appropriate consultation methods for hard to reach groups

Extract from p13 of the Milton Keynes Adopted Statement of Community Involvement, December 2006

4.4 The previous stages of consultation (as part of the MK2031 work and the Core Strategy: Issues and Options stage) were held for 12 week periods. However, under Regulation 27 (of the 2004 Regulations), this stage of consultation was restricted to a period of 6 weeks (as set out below):

“Representations on proposals for a development plan document

27. (1) Any person may make representations about a local planning authority’s proposals for a DPD.
(2) Any such representations must be-
(a) made within a period of 6 weeks starting on the day the local planning authority comply with regulation 26(a), and
(b) sent to the address and, where appropriate, the person specified in pursuant to regulation 26(b) to (d).
(3) A local planning authority shall not prepare and submit the DPD to the Secretary of State until they have considered any representations made in accordance with paragraph (2).”

Extract from the Town and Country Planning (Local Development)(England) Regulations 2004

4.5 Over the 6 week consultation period (27th September to 8th November 2007), the public and stakeholder engagement methods listed below were used to encourage interested parties to comment on the Core Strategy: Preferred Options document, plus the Sustainability Appraisal report which accompanied it. The Statement of Matters in Appendix B1 formed the statutory notice advertising the dates of the consultation period and where documents were available to view.

4.6 Presentations were given at the following meetings and events, as part of the Preferred Options consultation:  
Internal/Council Meetings  
– Corporate Leadership Team  
– Environment Department Management Team  
– Internal Officer Group  
– Local Development Framework Advisory Group  
– Lunchtime Growth Info session  
External Meetings  
– Aspley Guise Parish Council meeting (following an offer from MKC officers to attend parish council meetings in Aylesbury Vale and Mid Bedfordshire)  
– Bradville Play and Community Project – drop in sessions at Bradville Community Centre  
– Core Strategy discussion panel  
– Exhibition stand at the Safety Awareness Day at the Lakes Estate Community Centre
- GrowMK information session
- Joint consultation events with the Community Strategy
- Local Strategic Partnership ‘State of the Borough’ event
- LSP Planning Task Group
- Milton Keynes Forum ‘Setting a Sound Foundation for Growth – Local and Regional Core Strategies’ meeting
- MKCVO drop-in session
- MKELP Officer Group and Board
- Parish Assemblies
- Strategic Partnership Lead Officer Group
- Week-long display in the CentreMK shopping centre

4.7 Consultation documents and further information was made available in the following places:
- Documents made available at the Civic Offices and at all libraries
- Documents were published on the council website and for consultation through Limehouse

4.8 Additional and other forms of awareness raising included:
- Press release published in the Citizen
- All those registered on Limehouse were sent an automatic email notification when the consultation started
- Copies of consultation documents were sent to the relevant specific and general consultees, including neighbouring authorities, parish councils, etc.
- Letters and a CD copy of the consultation documents were sent to all Members notifying them of the consultation period
- Letters were sent to 6 MPs and 7 MEPs
- Letters were sent internally to directorate heads, heads of service, Development Control and Spatial Planning department.
- Article in LiveMK
- Information in the Town and Parish Council Newsletter
- Statutory notice and creative adverts in The Citizen every week during the consultation period
- Article included in the MKC Members’ weekly news
- Article included in the MKC internal Tuesday bulletin
- Article in Inform (newsletter for Head Teachers)
- Article/message on Facebook, Bebo and MySpace

4.9 In order to satisfy the requirements of Regulation 30(1)(d) of the 2004 Regulations (as amended\(^\text{13}\)) a list of the bodies and individuals that were invited to make representations at Regulation 26 (Preferred Options) is included at Appendix B2. As with the Issues and Options consultation, the ‘specific consultation bodies’ and parish councils were each sent a copy of the Core Strategy: Preferred Options document (on CD-ROM), with the comments form shown here in Appendix B3. To the remaining consultees on the list (including General Consultation Bodies and Other Consultees, as described in the SCI, page 26), a letter was sent making them aware of the consultation and where documents were available to view and download, with CD-ROM copies available from the Council. Sample letters are included in Appendices B4 (specific consultation bodies) and B5 (general and other consultation bodies).

4.10 The SCI extract above indicates that we would consider appropriate consultation methods for hard to reach groups. The methods used as part of the Preferred Options consultation that helped to

\(^{13}\) As amended by the 2008 amendment, but ignoring the 2009 amendment that removed the requirement to report on Regulation 26.
meet that aim include the sessions held with the Bradville Play and Community Project, the MKCVO and at the Lakes Estate. Children and young people were specifically targeted through Inform and online social networking sites.

4.11 As at the Core Strategy: Issues and Options stage, a comments form was prepared to encourage respondents to comment on the document. This is attached at Appendix B3. The consultation responses received as a result of these consultation methods were put into the Limehouse system. This system also allowed consultees to make their representations online, by inputting their responses directly into the web-based system. In total, 3,580 comments were received from 230 consultees (including individuals, groups, companies etc) over the consultation period. A quantitative analysis of those responses is attached at Appendix B6 as part of a report prepared by independent consultants, Ubiqus.

4.12 Through Limehouse, Council Officers prepared responses to each representation, and made recommendations to assist in the development of the Core Strategy: Submission Version. A summary of the main issues raised through the Core Strategy: Preferred Options consultation was published online in April 2009, and is included in Appendix B7. That summary document includes the recommendations taken forward to be considered as part of the preparation of the Core Strategy: Pre-Submission Version, in accordance with Regulation 27 (3) of the 2004 Regulations. The Officer responses to every representation can also be viewed through the Limehouse system14.

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14 [http://miltonkeynes-consult.limehouse.co.uk/portal/dev_plans/core_strategy/csso_sept07/](http://miltonkeynes-consult.limehouse.co.uk/portal/dev_plans/core_strategy/csso_sept07/)
5 CORE STRATEGY: PRE-SUBMISSION PUBLICATION STAGE

5.1 This document preparation stage for the Core Strategy incorporates comments received as part of the earlier consultation stages, along with the information gathered as part of the evidence base for the Core Strategy. The Core Strategy: Pre-Submission Version was approved for publication at the Full Council meeting on 12th January 2010. The publication stage was the opportunity for consultees to comment on the soundness and legality of the Core Strategy: Pre-Submission Version. The extract from PPS12 ‘Local Spatial Planning’ below explains the concept of soundness. Unlike in the previous stages, the publication stage is not the opportunity for consultees to make representations on the wording of the document, or the policy content etc, other than in relation to the tests of soundness and the legal process. Therefore, the approach to encouraging public and stakeholder engagement at this stage reflects those constraints.

“To be ‘sound’ a Core Strategy should be justified, effective and consistent with national policy. ‘Justified’ means that the document must be:
– founded on a robust and credible evidence base
– the most appropriate strategy when considered against the reasonable alternatives.
‘Effective’ means that the document must be:
– deliverable
– flexible
– able to be monitored.”

Extract from Planning Policy Statement 12: Local Spatial Planning (2008), p20

5.2 Regulation 27 of the Town and Country Planning (Local Development)(England) Regulations 2004 (as amended in 2008 and 2009) relates to this stage in the Core Strategy preparation process. The extract below sets out the legal requirements at the Core Strategy: Pre-Submission Publication stage.

“Publication of a development plan document
27. Before submitting a DPD to the Secretary of State under section 20, the local planning authority must-
(a) make a copy of each of the proposed submission documents and a statement of the representation procedure available for inspection during normal office hours-
(i) at their principal office, and
(ii) at such other places within their area as they consider appropriate;
(b) publish on their website-
(i) the proposed submission documents,
(ii) a statement of the representations procedure, and
(iii) a statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected;
(c) send to each of the specific consultation bodies invited to make representations under regulation 25(1) for the purposes of the DPD-
(i) a copy of each of the proposed submission documents, and
(ii) a statement of the representations procedure;
(d) send to each of the general consultation bodies invited to make representations under regulation 25(1) for the purposes of the DPD-
(i) a statement of the representations procedure, and
(ii) a statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected; and
(e) give by local advertisement notice which sets out-
5.3 As the regulations for this stage have changed since the adoption of the Statement of Community Involvement, the guidance in that document has been superseded by the 2004 Regulations (as amended).

5.4 To fulfil the requirements in the regulations, the following consultation proposals were undertaken:
- Pre-submission publication stage ran for 6 weeks (Wednesday 17th February to Wednesday 31st March 2010).
- Consultation was hosted online through the Limehouse system, at http://miltonkeynes-consult.limehouse.co.uk/portal/. Consultees were encouraged to make comments online.
- A statutory advert was placed in The Citizen and MK News local newspapers at the start of the consultation period fulfilling the requirements in Regulation 27(e).
- All submission documents (see 5.7 below) were made available at the Council Offices and all libraries within Milton Keynes, as well as on the Council and Limehouse websites.
- Letters were written to all specific consultation bodies and Town and Parish Councils (in and adjoining Milton Keynes Borough) (see Appendix C4), with a CD containing submission documents, a paper copy (where requested) of the Core Strategy: Pre-Submission Version, the statement of representations procedure (Appendix C1), statement of arrangements, Representation Form and Guidance Note for Respondents, and the summary leaflet.
- Letters or emails were sent to each of the general consultation bodies and other organisations and individuals (Appendix C5), including the statement of representation procedures, statement of arrangements, Representation Form and Guidance Note for Respondents, and the summary leaflet.
- A press release was issued to raise awareness of the publication period.
- Posters were displayed in Council offices and the CentreMK, and made available to Town and Parish Councils and the libraries to display where appropriate.
- A shorter summary leaflet was prepared and circulated amongst consultees and made available in libraries, Council offices and to Town and Parish Councils to help raise awareness (Appendix C3).
- Meetings were held with any Town and Parish Councils, and other stakeholder groups where requested, to discuss the document.
- Articles appeared in local and parish newsletters, including LiveMK, Members’ Weekly News, Growing MK e-update, MKCVO newsletter

5.5 Throughout the publication period, it was stressed that representations made at this stage must relate to soundness and legality.

5.6 The list of submission documents that were made available at this publication stage is extensive, as it includes any relevant supporting documents. The documents that must be submitted alongside the Core Strategy, and therefore should be made available at the pre-submission publication stage (where they already exist, i.e. not those referred to in points (e) and (f)) are set out in Regulation 30(1) below. The bracketed references to Regulation 26 in the extract below was removed as part of the 2009 amendment to the regulations, however they are included here for clarity as this statement (to which 30(1)(d) refers) does include information regarding the consultation undertaken at Regulation 26, Core Strategy: Preferred Options.
“30. (1) The documents prescribed for the purposes of section 20(2) are-
(a) the sustainability report for the DPD;
(b) a submission proposals map if the adoption of the DPD would result in changes to the adopted proposals map;
(d) a statement setting out-
   (i) which bodies and persons the local planning authority invited to make representations under regulation 25 [or regulation 26],
   (ii) how those bodies and persons were invited to make representations under regulation 25 [or regulation 26],
   (v) a summary of the main issues raised by the representations made pursuant to regulation 25 [or regulation 26],
   (vi) how any representations made pursuant to regulation 25 [or regulation 26] have been taken into account;
(e) a statement setting out-
   (i) if representations were made in accordance with regulation 28(2), the number of representations made and a summary of the main issues raised in those representations, or
   (ii) that no such representations were made;
(f) copies of any representations made in accordance with regulation 28(2); and
(g) such supporting documents as in the opinion of the authority are relevant to the preparation of the DPD.”

Extract from the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended)

5.7 The full list of documents included on the CD circulated to specific consultation bodies and Town and Parish Councils, made available on our website, and available to view (on the CD) at the libraries is shown at Appendix C6.

5.8 In total, 620 responses were received to the consultation, from 140 different individuals or organisations. Following the Pre-Submission Publication stage all comments received were collated and the key points summarised, in accordance with Regulation 30(1)(e). The summary of those representations is included at Appendix C7.
6.1 Since the February 2010 publication stage, the new coalition government has made some far-reaching changes to the planning system, notably the revocation of the Regional Spatial Strategies and the return of local planning and plan making powers to local councils. The revocation of the RSS (in our case, this was the South East Plan), led to a review of the Core Strategy. In August 2010, the Members of the Local Development Framework Advisory Group outlined changes to the Core Strategy that they wanted to see made in light of the removal of the South East Plan housing figures. The changes were signed off by Full Council on 14 September 2010.

6.2 The publication and consultation on this revised document was carried out in accordance with the same regulations set out above for the February 2010 version.

6.3 To fulfil the requirements in the regulations, the following consultation arrangements were in place for the Revised Proposed Submission stage:

- Revised Proposed Submission publication consultation stage ran for 6 weeks (Wednesday 6th October to Wednesday 17th November 2010).
- Consultation was hosted online through the Limehouse system, at http://miltonkeynes-consult.limehouse.co.uk/portal/. Consultees were encouraged to make comments online to help make processing more efficient.
- A statutory advert was placed in The Citizen and MK News local newspapers at the start of the consultation period fulfilling the requirements in Regulation 27(e).
- All submission documents were made available at the Council Offices and all libraries within Milton Keynes, as well as on the Council and Limehouse websites.
- Letters were written to all specific consultation bodies and Town and Parish Councils (in and adjoining Milton Keynes Borough) (see Appendix D3), with a CD containing submission documents, a paper copy (where requested) of the Core Strategy: Revised Proposed Submission Version, the statement of representations procedure (Appendix D1), statement of arrangements, Representation Form and Guidance Note for Respondents and a short information note (Appendix D5).
- Letters or emails were sent to each of the general consultation bodies and other organisations and individuals (Appendix D4), with web-links to all the consultation information, and information on where it can be viewed in paper copies.
- All consultees (individuals and organisations) were also sent a Consultation Database Update form to ensure we have the correct information for them.
- A press release was issued to raise awareness of the publication period.
- Posters were displayed in Council offices and the CentreMK, and made available to Town and Parish Councils and the libraries to display where appropriate.
- Articles appeared in local newsletters, including LiveMK, Members’ Weekly News, Growing MK e-update, MKCVO newsletter.

6.4 In total, 498 responses were received to the consultation, from 83 different individuals or organisations.

6.5 Following the consultation period, all comments received were collated and the key points summarised (see Appendix D6). In accordance with Regulation 30(1)(f), these consultation responses will be submitted to the Secretary of State along with the other submission documents, in preparation for an Examination in Public into the soundness of the Core Strategy. The responses received through the February 2010 Pre-Submission Publication will also be submitted to the Secretary of State at this time.
APPENDIX A  CORE STRATEGY: ISSUES AND OPTIONS STAGE

A1  COPY OF CORE STRATEGY: ISSUES AND OPTIONS COMMENTS FORM

The Core Strategy: Issues and Options paper to which this comments form relates can be viewed at http://www.miltonkeynes.gov.uk/planning-policy/documents/issues_and_options.pdf
Your views on the Options

Part 9 of the Issues and Options Discussion Paper sets out a number of options for moving forward to the next stage of the production of the Core Strategy. In the table below we have set out the policy themes for all of the options and we would like your views on them.

Here are a few questions to guide you:

- Looking at the Options in Part 9 of the Paper, which do you agree with?
- Are there other Options we should consider? If so, what are they?
- Do you have any other comments on the Issues and Options Discussion Paper?

Notes:
- You can use extra sheets of paper if you need to. Please attach them to this form.
- You do not need to comment on every policy theme.
- You will need to refer to the full table of Options in Part 9 of the Discussion Paper.

When you have completed the form, please send it to:
Spatial Planning Division, Milton Keynes Council, Civic Offices, PO Box 112, 1 Saxon Gate East, Central Milton Keynes, MK9 3HQ

For more information please ring the Development Plans team on 01908 252590
Or email us at: development.plans@milton-keynes.gov.uk

Please try to get your comments to us by 8th March 2007.
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Chiltern District Council
Chiltern Env Ltd
Chiltern Hundreds
Chiltern Railways
Church Commissioners
Churches Together Bletchley
Citizens Advice Bureau
City & St James Property Ltd
City Discovery Centre
Clarke Energy
Cleanaway
Wicken Parish Council*
Clr P Seymour
Cluttons LLP
CMK Campbell Park Sub Group
CMK Marketing Sub Group
CMK Town Centre Management Sub Group
CN & Y Davies
Colliers CRE
Commission for Architecture & Built Environment
Commission for Racial Equality
Commission for Rural Communities
Community and Regional Planning Services
Compact Power
Compass Land and Planning
Connell Land & Planning
Conniburrow Community Association
Connolly Homes plc
Conrad Ritblat Erdman
Conservative Party MEP Office
Corran (Wakefield) Ltd
Cory Environmental
Cosgrove Parish Council*
Council for the Protection of Rural England
Council for Voluntary Organisations
Councillor Janet Irons
Councillor Jessica Holroyd
Country Land and Business Association
Countryside Agency*
Countryside Planning & Management Ltd
CPM
Cranfield PC
Crown Estate Office
Cutts Brothers
CWS Property & Development
Cycling Organisations and Groups in S Beds
Cyclists’ Touring Club
David Lock Associates
David Swanston
David Walker
David Wilson Estates
Davies Associates
Deanshanger Parish Council*
DEFRA
Dennis Bray & Associates
Denton Wilde Sapte
Department for Communities and Local Government
Department for Culture and Sport
Department for Education and Skills
Department for Transport
Department of Health
Department of Trade and Industry
Derek Lovejoy Partnerships
Derek Smith Associates LTD
Development Land and Planning
Development Plan UK
Development Planning & Design Services
Development Planning Partnership
Dhosti Lunch Club
Dialogue
Disability Rights Commission
Disabled Persons Transport Advisory Committee
Disabled Representative on LSP
DK Symes Associates
Douglas Duff
Downs Barn Residents Association
DPDS Consulting Group
Dr Wright
Dr & Dr D & P Atkinson and Sharpe
Dr K Mashford
Dr L Dorn
Dr P Obara-Okeyo
Dr S H Cousins
Dr S Subramanian
Drake Partners
Drakelow Press
DREH Resources
Drivers Jonas
DTZ Peida Consulting
Dunlin Land Ltd
E.M.R. Ltd
Eagle Homes Ltd & Old Road Securities
Eaglestone Residents Association
East Midlands Development Agency*
East Midlands Electricity
East Midlands Regional, Local Government Association
East of England Development Agency*
East of England Regional Assembly*
East of England RTAB
East Sussex County Council
Easton Maudit Parish Meeting
EDAW Ltd
Edmund Nuttal Ltd
Elsworth Sykes Planning
Emberton Parish Council*
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English Heritage*
English Nature*
English Partnerships
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EQ Waste Management Ltd
F&R Cawley Ltd
Fairview New Homes Ltd
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Fenny Stratford Residents Association
Firbank Recycling Ltd
First City Limited
Fishermead and Oldbrook Residents Association
Fishermead Residents Action Group
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Focus Housing Association
FOR A
Forestry Authority, Thames/Chiltern Conservancy  
Forestry Commission  
FPD Savills  
Frances Fry  
Freight Transport Association  
Friends of the Earth  
Friends of the Mill Fields  
Frosts Garden Centre  
Fuller Peiser  
Fullers Slade Action Group  
G & A Planning  
G E Williams  
G L Hearn  
G R Planning  
G W Deeley Ltd  
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Gayhurst Parish Meeting  
Gazeley UK Limited  
GDA  
GEMK  
General Aviation Awareness Council  
Genesis Holdings Ltd  
Genesis Land Ltd  
George Wimpey  
Gerald Eve  
Gill Pawson Planning  
Gladedale Homes  
Gleeson Homes  
Global Renewables  
GMA Planning  
Gough Planning Services  
Government Office for East Midlands*  
Government Office for the South East*  
Grafton Regis Parish Meeting*  
Great Brickhill PC*  
Green Composting Services Limited  
Green Party MEP Office  
Greenfinch  
Greenlands Company Planning Limited  
Greenleys Residents Association  
Greenwood Development Planning  
Gregory Gray Associates  
Grundon Waste Management Ltd  
GTS  
GVA Grimley  
Gypsy Traveller Action Forum  
H E Nisbet  
Hackleton Parish Council*  
Hallam Land Management  
Hampshire County Council  
Hampshire Developments Ltd  
Hankinson Duckett Associates  
Hanson Aggregates  
Harrold PC*  
Hartigan Trading Ltd  
Hartwell Parish Council  
Health & Safety Executive  
Heath & Reach Parish  
Help the Aged  
Henry H Bletsoe & Son  
Hepher Dixon  
Herbert Smith  
Herhof Environmental Ltd  
Highways Agency*  
Hives Partnership  
HM Prison Service Headquarters  
Hodge Lea Residents Association  
Holley Blake  
Holmes Antill  
Home Office  
Horizon Development Designs  
Hot Rot  
House Builders Federation  
Housing Aid Centre  
Housing Corporation  
Howard Watson Smith & Co  
Howkins & Harrison  
HSL Properties  
Hulcote and Salford*  
Hutchinson 3G UK Ltd  
Hutchinsons  
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Jones Lang Lasalle  
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Kempton Rural*  
Kent County Council  
Kilkenny House Residents Association  
Kilvington Associates  
King Sturge  
Kings Oak  
Kirkby and Diamond  
L Ritchie  
Labour Party MEP Office  
Lafarge Aggregates Limited  
Lafarge Redland Aggregates  
Lambert Smith Hampton  
Land Network Boxon Ltd  
Land Securities Properties Ltd  
Landscape Design Associates  
Lathbury Parish Council*  
Leaseholders Action Group  
Leeds and Bradford Boiler Company Ltd  
Leighton Buzzard and District Preservation Society  
Lend Lease Europe Ltd  
Leon Residents Association  
Lesbian and Gay Link  
Level  
Liberal Democratic Party MEP Office  
Lighthouse  
Linde KCA Dresden GmbH  
Littman Robeson  
Living Archive  
Lloyds TSB  
London & Associated Properties plc
London RTAB
Lord Denham
Loughton Residents Association
Lucas Land and Planning
Luton Borough Council
M Goss & Sons
MacIntyre Housing Association
Madcap Theatre
Malcolm Scott Consultants Ltd
Marion Hill
Marks & Spencer
Mason Richards Planning
Material Change Ltd
Materials Recovery Ltd
Matthews & Son
May Gurney Limited
McCann Homes
McCarthy & Stone Ltd
Meads Close Residents Association
Medway Council
Mellish Court Residents Association
Mentmoor Homes Ltd
Messers Robinson & Hall
Messrs J S R Northern
Messrs G M & L Stacey
Messrs P & N Brock
Messrs T M Paton & Sons
Mid Bedfordshire District Council*
Mid Beds Planning Consortium
Midsummer Housing Association
Mill Road Residents Association
Milton Keynes Asian Women's Network
Milton Keynes Association of Local Councils
Milton Keynes Association of Urban Councils
Milton Keynes Astronomical Society
Milton Keynes Christian Council
Milton Keynes Christian Foundation
Milton Keynes Churches Council
Milton Keynes Community Foundation
Milton Keynes Community Health Council
Milton Keynes Community NHS Trust
Milton Keynes Covenant Fellowship
Milton Keynes Cycle Users Group
Milton Keynes Cycling Association
Milton Keynes East African Community Association
Milton Keynes Forum
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Milton Keynes Green Party
Milton Keynes Heritage Association
Milton Keynes Hindu Association
Milton Keynes Local Strategic Partnership
Milton Keynes Mencap
Milton Keynes Natural History Society
Milton Keynes Parks Trust
Milton Keynes Partnership Committee
Milton Keynes Pensioners Society
Milton Keynes Racial Equality Council
Milton Keynes Shopping Centre Association
Milton Keynes Theatre & Gallery Company
Milton Keynes Transport 2000
Milton Keynes Women and Work Group
Ministry of Defence
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Miss J Barrett
Miss J Beeby
Miss J McAuley
Miss/Mr Redbart/Cheshire Mission Partnership
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MK & District Reform Synagogue
MK & District Sports Council
MK & North Bucks Chamber of Commerce
MK Buddhist Temple
MK Centre for Integrated Living
MK Council for Disabled People
MK Council for Voluntary Organisations
MK Economy and Learning Partnership
MK Energy Agency
MK Forum
MK Global Centre Project
MK Metro
MK NHS Primary Care Trust*
MK TAG
MK Transport 2000
MK Women's Aid
MK Women's Forum
MK World Development Education Centre
MKC Community, Economy & Culture Service
MKC Neighbourhood Services
MK Social Inclusion & Health Inequalities
MKP*
Mobile Operators Association
Montague Evans
Mr Ashbourne
Mr Brooks
Mr Clarke
Mr Henshaw
Mr Hold
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Mr Horbury
Mr J Harrison
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Mr Knight
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Mrs McCarthy  
Mum & Co Playgroup, Olney Youth Centre  
Orbit Housing Association  

Mrs V Bradbury  
N E Devenish  
Oxford Diocesan Board of Education  

Mrs & Miss JM & BJ Briggs  
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PALS  

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PBA  

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Netto  
Peter Bennie Limited  

Mrs M Selwyn  
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Peter Finlayson Associates  

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New Earth Solutions  
Peter Martin and Co-Development & Planning Surveyors  

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New Force Developments Ltd  
Phillips Planning Services Limited  

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Pinecrest Properties  

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Planning Aid (South)  

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Planning Design  

Mrs S Cross  
Newton Longville Parish Council*  
Planning Development  

Mrs S Kirby  
NHS Estates  
Planning Perspectives  

Mrs S Malleson  
Norfolk Environmental Waste Services Ltd  
Planningissues  

Mrs S Miller  
North British Housing Association  
Pollards  

Mrs S Russell  
North Bucks Road Club  
Post Office Property Holdings  

Mrs Siobhan Turney  
Northampton Borough Council  
Potsgrove Meeting  

Ms Leake  
Northamptonshire County Council*  
Preserve Bow Brickhill  

Ms & Mr Barber & Patel  
Nuttall Hynes  
Prison Service Agency  

Ms & Mr I & M Page and Harrison  
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Property Intelligence plc  

Ms B Thompson  
O2  
Prowting Homes  

Ms D Clarke  
Oakdene Hollins Ltd  
Prudential Assurance Company / BTPS  

Ms J Bugg  
Oaktech Environmental Ltd  
Q:space  

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R D Gibbs  

Ms J Mears  
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R P S Chapman Warren  

Ms K Burrows  
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Racial Equality Council  

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Oliver Liggins ACR  
Radcliffe School  

Ms K Shipp  
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Railtrack Property, Railtrack Plc  

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Ramblers Association  

Ms L Norwood-Grundy  
Onyx Environmental Group plc  
Rapleys  

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Open University Library  

Ms M Peddel  
Orange PCS  

Ms P Peddel  

Ms S Croft  

Ms S H Willis  

Ms S Paulger  

Ms S Webb  

MTH Fullers Slade Family Resource Centre  

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Ray Merrington Chartered Architect
Realmoak Developments Ltd
REASON
Redrow Homes
Revd T Norwood
RMC Aggregates
Road Haulage Association
Robert Shaw and Partners
Robert Turley Associates
Robinson & Hall
Rodney Melville and Partners
Roger Bullworthy Associates
Roger Tyms & Partners
Royal Town Planning Insitutue
RPG for the East Midlands*
RPS Planning
SEEDA*
SEERAWP
Serco Gulf Engineering Limited
Shanks Waste Services Ltd
Shared Owners Forum
Shelter Housing Aid Centre
Shenley Brook End & Tattenhoe Parish Council*
Sherington Parish Council*
Silverlink Train Services Ltd
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Stamford Homes
Stereicycle
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Stony Stratford Business Association
Stony Stratford Community Association
Stony Stratford Partnership
Stony Stratford Town Council*
Stony Stratford Tree Warden
Strategic Land Partnerships
Surrey County Council
T Mobile
T Taylor
T V Beesley
Tanner & Tilley
Taylor New Homes
Taylor Woodrow Developments Ltd
Team Keyne-Trek
TechTrade Gmbh/ Wastegen (UK) Ltd
Terence O'Rourke
Terra Eco Systems
Tesco
TGR Williams & Son
Thames Valley Police
The Auto-Cycle Union Ltd
The Bell Cornwell Partnership
The Berkeley Group Ltd
The Castles Residents Association
The Composting Company
The Conservative Party
The Development Planning Partnership
The Fairfield Partnership
The Green Party
The House Builders Federation
The Inland Waterways Association
The John Phillips Planning Consultancy
The Labour Party
The Lakes Residents Association
The Landowners
The Liberal Democrat Party
The Mosque
The Newport Pagnell Partnership
The Open University
The Planning Bureau Ltd
The Planning Inspectorate
The Planning Practice
The Radcliffe School
The Rail Freight Group
The Showmen’s Guild of Great Britain
The Theatres Trust
The Well at Willen
The Wilkinson Partnership
The Wolverton Partnership
THERMSAVE ENGINEERING (UK) Ltd
Thomas & Company
Thomas Beazley & Sons Ltd
Three Valleys Water PLC*
Timberbase
Tinkers Bridge Residents Association
Town End, Stoke Goldington
Town Planning Consultancy
TPK
TR & BA Eastaff
TRANSCO*
Travellers Forum
Turley Associates (Britel Fund Trustees Ltd)
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UK Independence Party MEP Office
Universitat-GH Essen
University of Manchester
Vanbrugh Land
VCU Europa
Verdant Group Plc
Vincent and Gorbing
Virgin Rail Group Ltd
Viridor Waste Management Ltd
VKW Anlagenbau Und Umwelttechnik GmbH
Vodafone
W M Morrison Supermarkets PLC
W Needham & Sons
W R Davidge Planning Practice
Wakefield Farms Ltd
Wakefield Lodge Estate
Ward Councillor for Furzton, Parish Councillor for Kents Hill & Monkston PC*
Wardell Armstrong
Warmingtons
Warren Bank Residents Association
Waste Recycling Group
Water Eaton Residents Association
Weatherall Green & Smith
Weathercock Developments Ltd
WebbPaton
Wellman Recycling
West Bletchley Community Association
West Bletchley Council*
West End Methodist Church
West Northamptonshire Development Corporation
West Sussex County Council
Westbury Homes (Holdings) Ltd
Westcroft Health Centre
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White Young Green
Wilbraham Associates
Wilcon Homes Ltd
Wilkinson
William Davis Ltd
William Sutton Trust
Williams & Company
Wilson Bowden Developments
Woburn Parish*
Woburn Sands and District Society
Weathercock Developments Ltd
Woburn Sands Business & Community Association
Wolverton & District Senior Citizens Trust
Wolverton and District Archaeological & Historical Society
Wolverton Business Association
Wolverton District Archaeological Society
Wolverton Partnership
Wolverton Society for Arts & Heritage
Wolverton Unlimited
Women At Work
Wood Frampton
Woods Hardwick Planning Ltd
Wootton PC*
Workspace Group Plc
WRAP
WRG
WSP Development
Wycombe District Council
Wyn Thomas Gordon Lewis
Wyvern Waste
Yardley Gobion Parish Council*
Yardley Hastings Parish Council*
YMCA
Young Persons MP
Youth Housing Network
YRM Architects

* = Specific Consultation Bodies (see Statement of Community Involvement, p26) plus Parish Councils
Dear Consultee

MILTON KEYNES LOCAL DEVELOPMENT FRAMEWORK:
CORE STRATEGY ISSUES AND OPTIONS DISCUSSION PAPER

Why we are writing: If you’re interested in what’s happening about the growth of Milton Keynes over the next 10-20 years then the Core Strategy is one of the most important documents in the council’s Local Development Framework. When it is finished the Core Strategy will set the vision, objectives and strategy for the spatial development of the Borough. It will form the basis of all new planning policies the council will apply in the future. Key issues and the options for what the Core Strategy could say have been gathered together for people to consider in our ‘Issues and Options’ Paper.

Links with: The Core Strategy will continue the work that’s already been started on where housing will go, what facilities will be needed and what sort of jobs we want. In particular the enclosed paper feeds back on some of the key issues that people raised during the MK2026 growth strategy consultation over summer 2006. This consultation is important to the Core Strategy and the development strategy for the growth of Milton Keynes. However it is only part of what the Core Strategy is about and so the Issues and Options Paper looks at other things that need to be explored.

Consultation details: We’re looking for comments through to 8 March 2007. The paper is also available on CD or on the web: http://www.mkweb.co.uk/local_plan_review/home.asp. Reply to FREEPOST NATE 294, Planning, LUTS, Civic Offices, 1 Saxon Gate East, Milton Keynes, MK9 3BR or e-mail to the address above.

Note: The enclosed paper is not a draft Core Strategy and its format is not particularly important. It is just there to stimulate thoughts and debate.

And finally: Do you want to be part of a group that debates the Core Strategy? We are looking to put together a panel of people who are interested in working with us through the whole process of putting the Core Strategy together. On the other hand, if you don’t want us to write any more, then call the number above.

Regards

The Development Plans Team
Enc
A4 SAMPLE LETTER – GENERAL AND OTHER CONSULTATION BODIES

Brian Sandom
Corporate Director Environment

David Hackforth
Head of Planning and Transport

Our Ref: LDF/12
Reply To: Development Plans
Direct Line: (01908) 252599
E-Mail: Development.Plans@milton-keynes.gov.uk

7 December 2006

Dear Consultee

MILTON KEYNES LOCAL DEVELOPMENT FRAMEWORK: CORE STRATEGY ISSUES AND OPTIONS DISCUSSION PAPER

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Regards

The Development Plans Team
A5 EQUALITIES AUDIT

Equalities Audit for the consultation on the Core Strategy Issues and Options Discussion Paper

In line with Milton Keynes Council’s Statement of Community Involvement, an Equalities Audit has to be undertaken for each Local Development Document that is produced. This is to ensure that the consultation methodology adopted for each particular document is suitable and that any marginalized or hard to reach groups within the community are given an opportunity to participate. The Core Strategy will affect the whole Borough area and so this Audit looks at the general Borough profile.

1.0 Borough Profile

An analysis of key data relating to the borough of Milton Keynes will allow a baseline of the current borough profile to be created. This will enable us to identify appropriate methods of consultation based on the needs of different groups.

1.1 Age

The borough of Milton Keynes has both a significant proportion of young and old residents. In total 25.7% of the population is under the age of 18 (Census, 2001). There are also 10.3% of the population that are aged over 65 (Census 2001).

The chart to the right shows the age profile of Milton Keynes compared to that of the UK. It is noticeable that Milton Keynes appears to have greater numbers of people in the age groups from 0 to 54 years. This may reflect the number of families moving to the area.

1.2 Ethnicity

The highest proportion of ethnic minorities in the borough is Asian or Asian British (3.7%, Census 2001). Although this is significant for Milton Keynes, it falls below the national average of 4.6%.

There are also significant levels of Black or Black British (2.4%) and Mixed (1.8%) residents in the Borough

Although not making up a large proportion of the borough population, the Chinese population of Milton Keynes is almost twice the English average at 0.9%.

Looking at the statistics further, it is possible to see that 14.5% of all under 24 year olds in the borough are from BME groups, making them a significant proportion of the young population.

It is also notable that different ethnic groups are focused on different areas of the borough, such as the Pakistani community in Wolverton and the Bangladeshi population in Bletchley and Water Eaton.
2.0 Previous Consultation

The Core Strategy Issues and Options Discussion Paper is the first stage in the production of the Council’s Core Strategy. It is, however, worth considering the findings of an earlier questionnaire survey and Issues and Options consultation for the Waste DPD.

2.1 SCI questionnaire survey - In June 2005, a questionnaire was distributed to some 2,500 individuals and organisations who had contacted the Council in the past about the Local Plan. The questionnaire was also made available to fill in on-line on the Council’s website. The questionnaire provided a list of the consultation methods that had been used in the past to involve people in the preparation of the Milton Keynes Local Plan and to inform people about planning applications in their area.

Respondents were required to indicate which methods of involvement they had responded to in the past and would respond to in the future, and to provide any suggestions for improvement. A total of 183 responses were received (174 via freepost, 9 on-line). Nearly two thirds of the respondents (64%) were aged 51 and over. The smallest respondent group (only 9 responses, or 5%) was the 18-30 age group.

In terms of planning policy the results show that in the past people have generally responded well to public meetings and exhibitions, direct mail shots, items in parish council newsletter, and announcements in the newspaper. These also remained the most popular ways in which people wanted to be consulted in the future.

1.3 Housing Tenure

The Milton Keynes housing stock is changing all the time. At the last count, the 2001 Census, Milton Keynes had a high level of terraced homes (30.4%). There are also an above average proportion of detached homes (29.2%) and a significant level of semi-detached (28.5%).

In 2001 the borough had a low proportion of flats and apartments (11.9%), however over the last 5 years this figure may have gone up as the number of new homes being built increases.

1.4 Overall considerations

From this audit of the borough it is possible to draw out some conclusions that will help shape the consultation arrangements. Firstly, the age profile seems to suggest that there is high number of young families living in the borough. This means that the dissemination of information through schools could work successfully.

In terms of the ethnic population, the level is broadly in line with the national figure. However, in Milton Keynes the significant level of Asian/Asian British residents should be taken into account. It should also be noted that different areas of the borough have different ethnic make-ups and therefore different consultation requirements.

The type of dwellings is important as it makes certain types of consultation more practical than others. The fact that there appears to be a relatively low level of flats in the borough means that distribution of leaflets or newspapers is more likely to be successful (as delivery to flats can sometimes be problematic).
2.2 Waste Development Plan Document Issues and Options consultation

As with the SCI questionnaire survey there was a noticeable under representation of the under-25 age group in this consultation. Only 4.6% of the total responses were from this age group.

In general, the age groups over 46 years of age were over-represented in comparison to the level of population in the borough. This maybe linked to the fact that older residents, who have lived in the borough longer, were more likely to respond than newer residents of the borough.

The results from both the SCI survey and the Waster DPD consultation suggest that more work needs to be done to target the younger population of Milton Keynes. During the Issues and Options consultation on the Waste DPD, contact was made with 6th form students at Milton Keynes College, schools were written to and the YMCA and Youth Development Workers forum consulted. This approach appeared to have had limited success, so alternative techniques to engage with this age group should be sought.

These may include encouraging views through the Milk ‘n’ Beans website, as highlighted in the SCI. Other alternatives suggested by the SCI include utilising Community Mobilisers, who work in certain schools, and the Council’s ‘Inform’ newsletter.

3.0 Specific Issues for the Core Strategy Issues and Options consultation

In terms of consultation at this stage, the Government requirements are for us to consult with the specific and general consultation bodies as identified in the SCI. The SCI suggests that at this stage we should use the Equalities Audit to identify appropriate consultation methods for hard to reach groups. We should also try to give up to 12 weeks time for comment and let respondents know where responses can be seen and what the next stages will be.

The aim of the Issues and Options stage is to raise awareness of the Core Strategy and to encourage people to start to get involved in its preparation.

The document is a collection of thoughts and ideas of the issues that will affect the borough over the coming years. There are no policies or detailed site allocations to comment on at this stage instead we are trying to ascertain whether the issues and options raised are the right ones and whether there are others that should be considered.

The consultation should therefore aim to reach as wide an audience as possible. There are no site specific issues that would require the consultation strategy to target particular grid squares or residents. The consultation approach is using a mixture of:

- presentations to organisations – the LSP, Parish Assembly, MKC officers
- articles in a wide range of Council and external publications – such as the Housing Tenants’ newsletter, Inform to parents of school children, MKC Weekly News; Live MK; Sound News; minutes for the GTAF group meeting.
- advertising - posters and material in all libraries and at INCCA; posters and material on the displays in the centre:mk and in the housing area offices.
- direct mailing – to a wide range of businesses, interested groups and individuals on our database and also to all people who responded to the recent MK2026 growth strategy consultation.
4.0 Conclusion

Given the general and non-site specific nature of the current consultation a consultation approach has been adopted that aims to spread the word about the document as widely as possible.

As the Core Strategy proceeds through the stages of preparation and options and policies start to be firmed up, then the consultation approach will need to adjust in order to ensure that any area specific proposals are reflected in the Equality Audit and the consultation arrangements. People completing a comments form at this stage are being asked to complete an equalities monitoring questionnaire and the responses from this will be analysed and used to refine future consultation arrangements.
Milton Keynes Core Strategy Issues and Options Consultation - Summary of main issues raised

This summary has been prepared to provide an overview of the main issues raised during the 3-month consultation period on the Core Strategy Issues and options Discussion Paper. The summary does not make reference to every response made during the consultation but reflects the main concerns, ideas and viewpoints that respondents feel need to be addressed in the Preferred Options Document.

The overview is broken down into the sections that will make up the structure of the Preferred Options document to show where in the document particular concerns raised will be addressed.

Section 1 - The Strategy

A) Vision
Comments suggested that the primary focus should be on reflecting the key requirements of the regional Spatial Strategy (RSS) and the MK and South Midlands Sub-Regional Strategy (SRS).

There was much support for the visions in existing documents, such as the Community Strategy, the Local Plan, the Growth Strategy and the Economic Vision. It was felt by some that another Vision would cause confusion and that this approach would provide consistency.

Particular subjects or areas respondents felt needed to be included in the vision included: sport and recreation, rural areas, the natural environment, dynamic economy, climate change, public transport, protection of local character (inc. grid roads), retail role and hierarchy, regeneration, sustainable facilities and faith community requirements.

It was felt that there needed to be more emphasis in the Vision on the rural area: current visions appeared to focus primarily on the city area and new parts of the city rather than the whole borough.

It was acknowledged that the vision should be focused and deliverable and not be based on vague notions of ideals.

It was also noted that the Vision should be informed by a robust evidence base.

B) Strategy end date
There was considerable support for an end date of 2026 in line with the end of the RSS. In was noted that to go beyond this date would pre-empt any future review of that document.

2031 was also widely suggested as an appropriate end date, due to the need to fully implement the SRS. It was also suggested that 2031 would allow greater certainty for infrastructure providers planning investments.

However, it was noted that a later end date would mean make it difficult to rely on evidence to justify policies as it would be speculative in nature.

C) Spatial Strategy
It was acknowledged that the requirements of the SRS set fairly tight constraints on the spatial strategy and that more needed to be stated on the Council’s position regarding preferred broad directions of growth.
There was general support for a strategy that would see growth to the south east and west of the city. Other areas suggested for growth (not included in the MKP Growth Strategy) included the northern edge of the city, limited growth east of the M1 and increased development within several smaller settlements.

There was support from developers with interests in the rural areas for limited development in existing settlements, including Newport Pagnell, Sherington, Lavendon and Bow Brickhill. This was backed up by comments from residents associations and Parish Council’s of certain villages who felt that some development may be appropriate to support rural services, and provide affordable housing, as long as it is in keeping with the existing village. It was suggested that this approach would provide certainty for rural communities, rather than relying on speculative applications.

To a lesser degree, the alternate view to this was also expressed, with some respondents stating that rural development should be avoided as it would detract from village character and the villages could not cope with increased demands placed upon them.

There was some criticism of the role of the Growth Strategy, primarily as it is viewed as failing to fully consider all the spatial options for growth, including limited development east of the M1 and a full range of spatial options alongside differing urban capacity assumptions. One response suggested that more explanation needed to be given to justify why certain options were not viable, such as the perceived infrastructure costs of linking development east of the M1. It was also felt to be important that the role of the Growth Strategy be clarified in the Core Strategy document.

There was recognition that development in the existing urban area is important, but also that greenfield development would be inevitable due to the nature of the city. It was noted that when looking at a spatial strategy based on urban potential, consideration should be given to the fact that in some cases urban sites have greater biodiversity value than greenfield sites, with suggestions that in these cases greenfield growth would be preferable.

Responses acknowledged the need for growth to be built around promoting sustainable travel, with sites close to existing routes promoted, along with those that support east/west rail and that provide opportunities to support public transport interchanges, particularly close to the M1. It was suggested that a spatial strategy that prioritised development which helped to deliver public transport improvements could be favourable. This is particularly pertinent given comment from the Highways Agency and the ‘severe consequences’ that would face MK if a modal shift is not achieved.

The need to acknowledge the requirement for joint working was raised as an important aspect of delivering the spatial strategy, including the need to identify the number of homes expected outside the borough and how these will be linked to the existing city.

It was noted that flexibility and realism about potential to deliver needs to be built into the strategy. Some concerns were raised over the potential to overly restrict sites with potential for short term delivery by linking them to wider areas of long term potential. It was felt that this could have negative consequences for achieving the required rate of supply, and as such, a strategy that enables flexible delivery was highlighted as vital.

Green infrastructure was seen as integral to the spatial development of the city- it has a role to play in protecting existing settlements as well as providing space for wildlife and recreation, both important elements of the existing city that respondents felt should continue.

Other important points raised included the need to set out a spatial strategy that supports the continued success of CMK, delivers appropriate employment opportunities and allows for the regeneration of the existing city.
Comments suggested the Core Strategy should avoid too much detail—this should be for later documents, such as Area Action Plans.

D) Strategic Objectives
As with the Vision, there was much support for including all of the objectives of the various Milton Keynes strategies—although it was acknowledged that there will be some overlap between them already. The existing Local Plan aims in particular were seen as an appropriate list of objectives for the borough. The need to reflect the 6 objectives of the SRS was also noted.

It was felt important that the objectives seek to support and protect existing residents, as well as manage the impact of new development. It was particularly felt that an objective of the Core Strategy should be to protect rural communities.

It was also felt that it was important to reflect the objectives of other service providers and strategies to help co-ordinate delivery.

The need for deliverable and measurable objectives was noted, as was the need to retain a focus on the strategic nature of the plan.

The need to tackle climate change was seen as a key objective, with acknowledgement that it is a cross cutting issue, with several areas of the plan likely to include reference to it. This was also the case with wildlife conservation and transport use, which have the potential to be influenced by various parts of the plan.

Other issues specifically suggested for the Core Strategy objectives included—protecting attractive landscapes/greenspaces and protected habitats, supporting a successful local economy, supporting the principles of sustainable development, increasing participation in cultural activities, supporting existing communities, supporting the role of CMK, delivering a step change in housing completions and ensuring high quality design.

Section 2 - the Core Policies

1. Managing our impact

A) Climate Change
There was considerable support for Milton Keynes to be seen as an exemplar in terms of tackling climate change and promoting energy efficiency. It was acknowledged that the siting of development has an important role to play in influencing travel and associated emissions, and that working towards carbon neutral development should be a target. It was also noted that energy efficient development should be encouraged through policy on appropriate design.

However, it was also noted that tackling climate change should not overly restrict delivery through over stringent requirements—responses suggested that there is a need to achieve a balance and to allow flexibility to accommodate differing site characteristics, allowing the different opportunities presented by sites to be exploited. In particular, it was noted that the scale of urban extensions would provide opportunities that would not be appropriate for smaller sites.

B) Waste and Minerals
There was limited response on waste related issues. The potential to create increased opportunities for recycling was the one major issue raised that the Core Strategy could address.

The potential for worked minerals sites to be restored for biodiversity and wildlife benefits was acknowledged in responses. It was also noted that restoration provides an opportunity to contribute to
local Biodiversity Action Plan targets, through the development of the target habitats of particular areas. There was some concern that continued mineral extraction would be detrimental to the local area and that more should be done to encourage recycling of aggregates.

C) Impact of the car
Transport and movement is an issue which cuts across many parts of the plan. In relation to managing the impact of the car it was acknowledged that the allocation of specific sites should take into account accessibility to public transport, to encourage a modal shift, reducing dependence on the car. The importance of improving access by public transport to key facilities, such as shops and health facilities was also acknowledged. There was some support for a strategy which prioritises development in the most accessible areas and that helped to deliver key transport improvements.

In relation to this, it was recognised that development in certain locations provides the opportunity to support enhanced public transport routes, major transport interchanges or even other mass transit alternatives.

Responses from village representatives highlighted the need to consider the impact of increased development on rural areas, with villages such as Bow Brickhill and Castlethorpe suffering due to increased levels of traffic. However, the view was also put forward that increased development in villages could help make rural public transport more viable.

It was felt that the quality of public transport- the routes and the facilities- had to improve to realistically provide an attractive alternative to the car. Also, the importance of design and its influence on movement patterns was acknowledged. Respondents felt that the Core Strategy, through effective spatial planning, could reduce the need to travel, and through good design could also encourage people to walk and cycle rather than rely on the car for short journeys.

The role of rail on reducing the impact of the car was, by the majority of respondents, seen as important- this included support for east/west rail, as well as building on existing stations, such as CMK, Woburn Sands and potentially Ridgemont. There was some support for public transport interchanges, where the possibility of providing for transfer between rail, bus and the car at strategic locations was mooted. However, there was some concern on basing a strategy around reliance on delivery of rail improvements given the lack of funding and method of implementation.

There was some support for the ‘hard line’ on car users, including increased parking costs and reduced parking provision, however it was also recognised that as Milton Keynes is built on the car, any change could be detrimental to the attractiveness and functioning of the city in the future, particularly with the current public transport system.

Respondents also recognised that the impact of transport activities on homes near major routes could be an issue in the future. It was suggested that air quality and noise near the M1, A5 and rail routes could harm the quality of life for residents living close to them.

D) Water efficiency
Responses reinforced the need to locate new development away from flood risk areas and continue to implement the appropriate flood mitigation methods successfully developed in Milton Keynes. This was seen as important, particularly in light of the potential implications of climate change, to limit the impact on local water cycles.

There was general support for future proofing of new development and for encouraging the use of alternative approaches to water conservation, such as grey water retention as well as SUDs. As with energy efficiency, it was recognised that there should be flexibility to ensure that any imposed requirements don’t restrict delivery.
E) Healthy lifestyles
Development has the potential to impact on everyday life. Responses recognised that there was a need to encourage design that facilitates activity, with access to open space, key facilities and play space seen as important.

2. Serving Existing Communities

A) Regeneration
It was recognised that growth of Milton Keynes should contribute to the regeneration of the existing urban area to make growth acceptable- although it was acknowledged that due to the nature of the city, substantial greenfield development would still be needed.

Responses identified the role of sites in existing towns such as Newport Pagnell, as being important in supporting sustainable communities and that vacant and under utilised employment sites should be seen as suitable locations for housing growth.

The need to protect the integrity and liveability of urban areas was seen as important, with all green spaces on inner city estates not to be seen as potential development sites and overdevelopment of sites to be avoided. Added to this, as was mentioned previously, it was noted that some brownfield sites will have established biodiversity, which could make them more ecologically important than greenfield sites.

It was felt that there is a need for a long-term co-ordinated approach to regeneration across Milton Keynes, establishing priorities and helping to provide a framework for wider investment. It was also acknowledged that community consultation should be integral to all development in the existing urban area to ensure existing communities are involved in ‘managing’ regeneration at a local level.

The need to establish the capacity of the urban area was noted as was the need to adopt an approach to development of brownfield sites that encourages wider benefits, such as increasing the viability of public transport and providing affordable housing. It was also noted that regeneration provides an opportunity to address identified needs- this includes future need that could be established by looking at demographic trends and market information.

It was recognised that standards of design should be adopted that respect and enhance existing urban areas, with particular attention given to the requirements of enhancing conservation areas. This includes developing opportunities for improvements in energy efficiency and promoting development that, through good urban design, will support a reduction crime.

B) Rural centres
There were a range of responses on how rural settlements should be treated. A number of sites within settlements were put forward for development on the premise that they were able be developed in the context of the existing settlements, would support existing rural facilities and provide needed affordable housing. To this end, there was support for identifying settlements where additional development would be acceptable, and for identifying the specific number of dwellings that will be accommodated in rural parts of the borough. It was noted that this approach would be vital to continue to make rural centres viable as the urban area grows. It was also noted that the continuation of rural services was integral to protecting the character of settlements where local shops and facilities are often key elements of a settlements history.

However, the alternative view was also expressed that any development in rural centres would put increased pressure on local facilities and infrastructure, rendering it unviable. There was also concern that new development would be out of keeping with the existing character of rural areas. It was felt that if rural development were to occur, there would be a need to control style and density, as well as ensuring that limited development would not lead to further ‘sprawl’ in the future.
C) Reducing inequalities

It was recognised that there are areas in Milton Keynes where work needs to be done to support the local population, particularly in terms of affordable housing, access to key facilities and social cohesion.

The need to consider the changing demographics of the population was also recognised, with responses indicating an approach that adequately integrates the aging population into communities is required, along with a response to the increasing number of single person ‘households’.

The increasing ethnic diversity of Milton Keynes was acknowledged by some respondents. It was felt that more needed to be done to effectively integrate communities and that the cultural differences needed to be acknowledged, such as the desire of some ethnic populations to live within groups rather than as individuals, due to the support provided. It was noted that the needs of other specific groups, such as travellers and show people also needs to be addressed in the strategy.

The important role that schools play within communities was acknowledged in responses, with the idea of co-location of facilities raised. It was also felt that more needs to be done to provide links between education and jobs, though increased support for adult services and more vocational training, helping to provide appropriate skills to enter the work place and reduce inequalities.

As has been previously mentioned, the issue of the link between deprivation and health was raised. It was felt important that within any development proposals, access to quality open space and leisure facilities be maintained, ensuring opportunities for activity remain.

D) Enhancing facilities

Responses highlighted various different facilities that it was felt should be tackled through the Core Strategy. These included provision for community and faith facilities, open space (both formal and informal), health, education, retail and cultural/tourist facilities. The main thrust of responses was that the Core Strategy should support the effective delivery of the various strategies specifically prepared for individual topics, in particular ensuring that areas of growth give full consideration to the range of facilities that will be needed to support the increased population- ensuring existing residents do not suffer.

There was an acknowledgement that the support for local centres should be continued, ensuring they remain viable and attractive. In particular comments referred to the need for centres outside CMK to offer complimentary, day to day facilities, rather than provide competition for CMK. It was noted that by providing for niche markets that cannot be effectively accommodated in CMK (due to cost etc...), retail could aid the regeneration effort in Bletchley and Wolverton.

3. Growing new communities

A) Strategic expansion areas

As was mentioned in the Spatial Strategy section, responses indicated that the Core Strategy will need to give a clear indication of the Council’s preferred directions of growth. These comments were summarised in the earlier section. It was widely accepted that there would need to be greenfield expansion and that this expansion should be achieved in a sustainable manner.

With regard to the content and functioning of expansion areas, comments highlighted the importance of enabling the requirements of the market to be met, rather than being over prescriptive, which could hamper delivery. This includes ensuring that policies which address issues, such as energy and water efficiency, renewable energy and housing size, allow flexibility for developers of individual sites to make the most of individual site characteristics.
Responses highlighted the need to ensure strategic growth areas functioned effectively as part of the wider city area, with the potential for growth areas to support enhanced public transport seen as being particularly important, along with the potential for growth to aid the viability of centres such as Bletchley and Newport Pagnell. There was also support for successful elements of the existing city to be carried forward through expansion, including the linear park system. It was noted, however that it should not be the role of the Core Strategy to set out details of this- it should simply provide a strategic overview.

B) Housing numbers
It was widely accepted by respondents that the number of homes to be delivered will be determined by the outcome of the SEP EiP. Many responses focused on how best to deliver the required number of houses.

It was felt that an approach which allows flexibility will be important, to ensure that the rate of delivery was able to keep up with the required pace. Other responses related to delivery suggested-

- Prioritising development sites in the most accessible locations;
- Developing sites having regard to existing expansion areas, rather than as part of large new expansion areas, which could slow delivery;
- Increasing the level of rural housing;
- Having additional housing sites to be released to cope with any revisions in the RSS;
- Having a trigger policy to allow early development of the Strategic Reserve sites, if development of the expansion areas is delayed; and
- Increasing the number of dwellings to be delivered in areas where there are the least barriers to delivery (i.e. environmental constraints)

There was support for identifying numbers of dwellings to be delivered in the urban and rural areas, with a recognition that an assessment needs to be carried out of the capacity of individual settlements and the city area to establish numbers in more detail.

There were a limited number of responses that felt Milton Keynes had already grown to its limits and was the wrong location for growth.

C) Community facilities
There were no responses that suggested a fundamental change in the way that community facilities are delivered will be needed. There was support for the existing principle of locating all development within 500 metres of a local centre- although it was questioned whether this approach enables the development of viable centres, given their relatively small size?

As mentioned in a previous section, there are various facilities that respondents felt were essential to the functioning of the city and which should be reflected in the Core Strategy. The need to consider the timing of delivery was raised, with it being felt that to prevent impacting on existing facilities and to ensure new areas function as intended, the early delivery of key facilities will be needed.

It was also noted that there are new ways of delivering some essential services, such as healthcare and educational facilities, which the Core Strategy will play a key role in ensuring delivery of.

4. Supporting the City’s Economy and Sub-Regional Role

A) Employment land
It was acknowledged that there is little point in retaining land designated for employment use if it is no longer fit for purpose or if it can be shown there is no employment demand for it. There was support for utilising such sites, where appropriate, to deliver the required housing numbers.
There were varying responses with regard to the approach the Core Strategy should take to providing for employment land in the future. The objective of the Economic Vision to move towards a knowledge based economy was noted, as was the need to continue to adequately provide large footprint logistics developments, successful in Milton Keynes due to its high quality road connections. The importance of having a spread of employment types was recognised, with the local economy not having to rely on the continued success of one particular industry.

The ability to attract high quality jobs to the area was seen as important, with an acknowledgement that some firms seek specialist locations- such as the Technopole development, which is starting to see an increased focus of activity. It was felt important that the Core Strategy support this type of development.

In terms of location of employment land, the need for it to be readily accessible was the primary response. There was support for encouraging businesses to grow on their existing sites and for providing employment sites as part of strategic growth areas located near to the A421 and the M1.

B) University and education
The provision of enhanced training and education opportunities was highlighted by respondents as being fundamental to the future success of Milton Keynes. The desire for a university in the city was broadly supported, with suggestions that utilising the existing universities at Cranfield and the Open University could be good option. The need for a university was seen as of particular importance if a move towards a knowledge based economy was to be supported.

Also noted was the need to increase opportunities for the local population to improve their skill levels to help drive the economy forward and ensure that local residents benefit from the opportunities provided by growth.

C) Major cultural and sporting facilities
There was limited response regarding the approach to major cultural and sporting facilities. What responses there were felt that the Core Strategy should recognise Milton Keynes' cultural assets and improve accessibility to them. It was also acknowledged that there needs to be sufficient provision of facilities to support an increase in population.

The retail role of CMK, which is discussed more fully below in relation to CMK, could be seen as one of Milton Keynes' major cultural facilities. Responses recognised that CMK is key to the continuation of Milton Keynes as a regional centre, and that to continue to be successful there is a need for the centre to diversify its offer to continue to be attractive to visitors and tourists.

D) CMK
The importance of CMK in establishing Milton Keynes' retail role was highlighted through the consultation. Responses in particular acknowledged the significance of supporting the centres retail role, which is seen as the centres main attribute. However, it was also felt important that the right balance was struck between supporting CMK and maintaining the viability of other centres further down the retail hierarchy.

The requirement for an accepted retail capacity study was noted, as was the fact that later in the strategy period, there would be a need to revisit capacity estimates to gain an up-to-date picture of retailing in the city.

The supporting role played by other facilities in improving the attractiveness of CMK was noted. It was felt that encouraging the diversification of CMK's offer, and supporting the establishment of a critical mass of activity, could help improve the centre as a visitor destination.
The role of underused sites in CMK (including ground level parking) in supporting the centres improvement was picked up in responses. It was also noted that an improved community spirit in the centre and a more innovative approach to design would aid CMK’s attractiveness.

5. Managing our assets

A) Landscape Character

There were mixed responses in terms of the approach taken to addressing landscape character. Some responses supported the complete protection of all areas of attractive landscape (AAL) others felt that development within the open countryside was acceptable, as long as it was carried out in a sensitive manner. The importance of a Landscape Character Assessment in informing any decisions made was highlighted as important by many respondents.

It was noted that the general growth of Milton Keynes has the ability to erode landscape character, with the required infrastructure and other permitted development, such as masts, lowering the quality of the landscape.

The role of surrounding landscape in protecting the character of rural settlements was highlighted, as was its importance as a valuable and free recreation space for Milton Keynes.

The identification of permanent defensible boundaries to the city received some support, with links to the protection of rural identify highlighted. Suggested boundaries included the Ouse to the north of the city and the Bletchley to Bedford railway line to the east.

B) Open space (urban and rural)

In both urban and rural areas, the importance of open space in defining character and contributing to the day-to-day lives of residents was acknowledged. It was widely accepted that a comprehensive plan for the approach to open space and green infrastructure, needs to be included in the Core Strategy.

In the urban area, the importance of the grid road corridors, as a source of open space for wildlife movement and in terms of defining the character of Milton Keynes, was highlighted. The linear park structure received support, with it’s continuation into expansion areas advocated. Its potential role in linking rural areas to the city as well as providing a green buffer to areas such as Bow Brickhill was seen as important to supporting the vitality and attractiveness of the rural areas. It was noted, however, that the Core Strategy should avoid being prescriptive in the location of any such designations, as this was for later documents.

As was highlighted in an earlier section, the biological importance of green spaces can sometimes outweigh that of greenfield sites. Responses also highlighted that development of useful urban green spaces should be resisted as they are important to maintaining the quality of life for residents. It was felt that development of urban open spaces should only occur on unused or marginal areas, where development has the potential to improve the quality of the environment and achieve a net gain in biodiversity. Open areas that make a contribution to day-to-day living or that have help define the character of an area, should be protected.

C) Built heritage

The importance of protecting the historic environment of Milton Keynes was recognised in the consultation. There was an acknowledgement that this could include some of the more modern aspects of the city, such as the Point and the shopping centre building, as they are unique for their time.

It was noted that the location of development from the outset could protect areas of importance or that design policies could be used to actively mitigate potential conflicts, such as density. Given the level of development in Milton Keynes, the recording and monitoring of information relating to the historic
environment was seen as being important, to ensure the history of Milton Keynes is not lost and also to ensure decisions are properly informed with regards to their potential impacts on the historic environment.

D) Wildlife assets
The consultation highlighted the importance of ensuring that the need to protect important habitats and species is integral to the Core Strategy. Issues that were seen as particularly important in the context of growth and development included the potential fragmentation of habitats, buffering of vulnerable habitats and the creation of appropriate new habitat areas to support biodiversity. As mentioned above, the grid road corridors were noted as being of particular importance for wildlife movement. It was felt that any development of these areas could be detrimental to the green network that supports Milton Keynes’ biodiversity.

The cross cutting nature of the open space and biodiversity was noted, with links to recreation and human health important. Also, the need to consider the importance of open spaces in the urban area in supporting local wildlife, was highlighted as being an integral to the selection of development sites.

The need for the Core Strategy to consider how the Council meets the requirements placed on it by various Acts, such as the Countryside and rights of Way Act 2000, was also raised.
APPENDIX B  CORE STRATEGY: PREFERRED OPTIONS STAGE

B1  STATEMENT OF MATTERS
STATUTORY NOTICE IN NEWSPAPER

STATUTORY NOTICE

MILTON KEYNES LOCAL DEVELOPMENT FRAMEWORK, CORE STRATEGY- PREFERRED OPTIONS (SEPTEMBER 2007).

Planning and Compulsory Purchase Act 2004
The Town and Country Planning (Local Development) (England) Regulations 2004
Regulation 26 - Pre-Submission Public Participation

Milton Keynes Council has published its Core Strategy Preferred Options document for a six-week period of public consultation from Thursday 27 September to Thursday 8 November 2007.

The Core Strategy is an important Local Development Document, which forms part of the Council’s Local Development Framework (LDF). When adopted by the Council, it will set out the vision, objectives and strategy for the development of the whole Milton Keynes Council area to 2026. The Core Strategy will form the basis of all new planning policies that the Council will apply in future.

You will be able to view the Core Strategy Preferred Options document and make and view comments online, using our new consultation system, Limehouse at: http://consultation.limehouse.co.uk/milton-keynes/drafts/8/index.html

Alternatively you can fill in a Comments Form. This will ensure that the Council has all the information needed to process any representation you wish to make. Copies of the Comments Form are available from all libraries in the borough or by contacting the Development Plans Team.

Completed Comments Forms should be returned to the Development Plans Team, using our freepost address (no stamp needed): Development Plans Team, Milton Keynes Council, FREEPOST NATE 294, Planning, LUTS, Civic Offices, 1 Saxon Gate East, Central Milton Keynes, MK9 3HQ.

Receipt of all comments will be acknowledged.

All comments on the Core Strategy Preferred Options must be received by the Development Plans Team no later than 5.30pm on Thursday 8 November 2007.

Reference copies of the Core Strategy, Sustainability Appraisal and other supporting documentation are also available to view at the Council’s Civic Offices, 1 Saxon Gate East, Central Milton Keynes, MK9 3HQ during normal office hours (9.00 am to 5.15 pm, Monday to Friday).

All libraries within the Borough (opening times vary) will also hold reference copies of the Core Strategy Preferred Options document and Sustainability Appraisal. The location and opening times of your nearest library can be found on the Council’s website at: http://www.milton-keynes.gov.uk/library%5Fservices/DisplayArticle.asp?ID=28715

You can also request a free CD-ROM. This includes a copy of the Core Strategy, Sustainability Appraisal, Comments Form and Monitoring Information Form. If you would like a copy, please contact the Development Plans Team on 01908-252599 or by email at: development.plans@milton-keynes.gov.uk
Following consideration of any duly made comments received on the Core Strategy Preferred Options document the Council will be preparing a final version of this document for submission to the Government in early 2008.

Any representation made to the Council may be accompanied by a request that you wish to be notified at a specified address that the Core Strategy DPD document has been submitted to the Secretary of State for independent examination and the document has been adopted by the Council.

If you need further information or assistance please contact the Council’s Development Plans Team on 01908-252599 or by email at: development.plans@milton-keynes.gov.uk
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Countryside Planning & Management Ltd
Cranfield Parish Council*
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David Swanston
David Walker
Davies Associates
Deanshanger Parish Council*
Defra
Department for Communities and Local Government
Department for Culture and Sport
Department for Education and Skills
Department of Trade and Industry
Derek Lovejoy Partnerships
Derek Smith Associates LTD
Development Land & Planning Consultants
Development Plan UK
Development Planning Partnership
Disability Rights Commission
Disabled Persons Transport Advisory Committee
DK Symes Associates
Downs Barn Residents Association
Drivers Jonas
DTZ Peida Consulting
Dunstable Waste Group Ltd
E.M.R. Ltd
Eaglestone Residents Association
East Midlands Development Agency*
East Midlands Regional Assembly*
East of England Development Agency*
East of England Regional Assembly*
Easton Maudit Parish Meeting
Emberton Parish Council*
English Heritage
Environment Agency*
Environmental Services Association
Epcad
EQ Waste Management Ltd
F&R Cawley Ltd

Fairview New Homes plc
Faulkners
Fenny Stratford Residents Association
Filgrave and Tyningham Parish Meeting*
First City Limited
Fishermead and Oldbrook Residents Association
Fishermead Residents Action Group

Hodge Lea Residents Association
Home Office
Horizon Development Designs
Hot Rot
Housing Corporation
Howard Watson Smith & Co
HSL Properties
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Hutchinsons
Ian Smith Construction
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IET Energy
Inventures
ISKA GmbH
J Garrard & Allen
J W Cook & Son
Januarys Chartered

Surveyors
JB Planning Associates
Jephson Housing Association
JW & D S Adams
JW Cook & Son
Kempston Rural*

Kents Hill & Monkston Parish Council*
Kilkenny House Residents Association
Kilvington Associates
King Sturge
Kings Oak
Kirkby & Diamond
Lafarge Aggregates Limited
Lambert Smith Hampton
Lathbury Parish Council*
Lavendon Parish Council*
LBBC Technologies
Leaseholders Action Group
Legal & General Ltd
Leighton-Linslade Town Council

Leon Residents Association
Level
Lighthouse
Little Brickhill Parish Council*
Lloyds TSB
London & Associated Properties plc
London RTAB
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Mr G Foll               Mr P Saunders               Mrs J Markham
Mr G Lowery              Mr P T Snook              Mrs J S Woods
Mr G Moinet              Mr P Taylor                Mrs L Rooney
Mr G O Randall           Mr P Willis                Mrs M Antalopoulos
Mr G Quigley             Mr P Zanna                Mrs M S Kidd
Mr G Ringer              Mr R Ashdown               Mrs M Selwyn
Mr G Simonds             Mr R Ashdown               Mrs M Skinner
Mr G W Nicholls          Mr R Blyth                 Mrs P Kurtz
Mr G Webber              Mr R D Parker              Mrs P S Martin
Mr H Bonner              Mr R H Durrant             Mrs P Thomson
Mr H Gilbert             Mr R Harrison              Mrs R Meardon
Mr H Winfield            Mr R Merrington           Mrs S Cross
Mr I Seddon              Mr R Morter                Mrs S Kirby
Mr J A Coulson           Mr R Sawbridge             Mrs S Malleson
Mr J A Kitchener         Mr R Taylor                Mrs S Miller
Mr J Baker               Mr R White                 Mrs S Russell
Mr J Drury               Mr Richard Greenwood        Mrs Siobhan Turney
Mr J Kottler             Mr Richard Kay              Ms Leake
Mr J Lay                 Mr Roger Rose              Ms & Mr Barber & Patel
Mr J M Middleton         Mr S Bellaby               Ms & Mr I & M Page and Harrison
Mr J M Williams          Mr S Coles                 Ms B Thompson
Mr J Mitchell            Mr S D Murray              Ms D Clarke
Mr J Payne               Mr S Flick                 Ms J Bugg
Mr J Pennells            Mr S J Shaw                Ms J Henderson
Mr J R Martini           Mr S P Heathfield           Ms J Mears
Mr J R Wales             Mr Stephen Bowley          Ms K Burrows
Mr John Martin           Mr T Jones                 Ms K Dunmore
Mr K Causebrooke         Mr T Moss                  Ms K Shipp
Mr K Mayes               Mr V M Doherty            Ms L Norman
Mr K Woodward            Mr V Roberts               Ms L Norwood-Grundy
Mr L Stacey              Mr W H Sargeant           Ms M Butler
Mr M A Willinger         Mr W Sawbridge             Ms M Peddel
Mr M de Andrade          Mr/Mrs P D Davidson         Ms P Gifford
Mr M H Jackman           Mr/Ms A B & J M Jenner       Ms S Croft
Mr M H Lloyd             Mr/Ms P & M Hodgkins          Ms S H Willis
Mr M Haddock             Mr/Ms P A Lousada           Ms S Paulger
Mr M J Duff              Mrs Bland                  Ms S Webb
Mr M McHugh              Mrs Everitt                 MTH Fullers Slade Family Resource Centre
Mr M Moutrie             Mrs Fletcher               Nash Parish Council*
Mr M P Beesley           Mrs Lavarack                Nathaniel Lichfield
Mr M Tamkin              Mrs McCarthy               National Air Traffic Services
Mr Michael Kemp          Mrs V Bradbury             National Farmers Union
Mr N Arthur              Mrs & Miss JM & BJ Briggs         National Grid*
Mr N Fuller              Mrs C Baxter               National Playing Fields Association
Mr N Munro               Mrs D Hobbs                National Power plc
Mr P Cooper              Mrs E A Jackson           Natural England*
Mr P Emery               Mrs E Gifford              Netherfield Residents Association
Mr P H Davies            Mrs E M E Price            Netto
Mr P Harrison            Mrs H Jones                 Network Rail*
Mr P J Gamble            Mrs H Smedley              
Mr P Jynott              Mrs J Hudson                
Mr P Jones               Mrs J J Miller              
Mr P Menday              Mrs J Lampert              

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New Bradwell Parish Council*
New Force Developments Ltd
Newport Pagnell Business Association
Newport Pagnell Partnership
Newport Pagnell Town Council*
Newton Longville Parish Council*
NHS Executive
Nipponzan Myohoji
Norfolk Environmental Waste Services Ltd
North Bucks Road Club
North Crawley Parish Council
Northampton Borough Council
Northamptonshire County Council*
Nuttall Hynes
O & H Properties Ltd
O2
Old Stratford Parish Council*
Old Wolverton Residents Association
Old Wolverton Residents Association
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Olney Chamber of Trade
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Olney Town Council*
Onyx Environmental Group
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Orange PCS
Oxford Diocesan Board of Finance
Oxfordshire County Council
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PALS
Patient and Public Involvement Forums
PBA
PDD Architects
People First
Persimmon Homes
Peter Bennie Limited
Peter Finlayson Associates
Phillips Planning Services Ltd
Pinecrest Properties
Places for People Homes
Planning Co-ordinator
Planning Design Development
Planningissues
Post Office Property Holdings
Potsgrove Parish Meeting*
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Property Intelligence plc
Racial Equality Council
Rambler's Association
Ravenstone Parish Council*
Redrow Homes
RMC
RMC Aggregates (UK) Limited
Road Haulage Association
Robinson and Hall
Rodney Melville and Partners
Roger Bullworthy Associates
Royal Town Planning Insitutue
RPS Planning Transport and Environment
Rupiya Finance Ltd
Samuel Rose
Scott Wilson
SEEDA*
SEERAWP
Shelter Housing Aid Centre
Shenley Brook End & Tattenhoe Parish Council*
Shenley Church End Parish Council*
Sherington Parish Council*
Silverlink Train Services Ltd
Simpson Parish Council*
SITA UK
Smith Stuart Reynolds
Soulbury Parish Council*
South Bedfordshire District Council*
South Bucks District Council
South East England Regional Assembly*
South Northamptonshire Council*
Southern Gas Networks
Specialist Groundwork Services Construction Ltd
Sport England
Stagecoach East
Stagsden Parish Council*
Stamford Homes
Stantonbury Parish Council*
Star Planning and Development Limited
Station News
Stewartsby Parish Council*
Stoke Goldington Parish Council*
Stoke Hammond Parish Council*
Stony Stratford Business Association
Stony Stratford Community Association
Stony Stratford Partnership
Stony Stratford Town Council*
Strategic Land Partnerships
T Mobile
Tanner & Tilley
Taylor Woodrow Developments Ltd
Taylors New Homes
TechTrade Gmbh/ Wastegen (UK) Ltd
Terence O'Rourke
Tesco
Thames Valley Police HQ
The Berkeley Group Ltd
The Castles Residents Association
The Conservative Party
The Development Planning Partnership
The Fairfield Partnership
The Green Party
The House of Commons
The Labour Party
The Lakes Residents Association
The Mosque
The National Energy Foundation
The Open University
The Planning Bureau
The Rail Freight Group
The Well at Willen
Thecentre:mk
Thomas & Company
Tinkers Bridge Residents Association
Town Planning Consultancy
Turvey Parish Council
University of Manchester
Virgin Rail Group Ltd
Viridor Waste Management Ltd
Wakefield Lodge Estate
Walton Parish Council*
Warrington Parish Meeting*
Waste Recycling Group
Water Eaton Residents Association
Wavendon Parish Meeting*
Wellman Recycling
West Bletchley Council*
West End Methodist Church
Westcroft Health Centre
Weston Underwood Parish Council*
Whaddon Parish Council*
White Young Green
Wicken Parish Council*
Wilbraham Associates
Wilcon Homes Ltd
William Davis Ltd
William Sutton Trust
Williams & Company
Wilson Bowden Developments
Woburn Parish Council*
Woburn Sands & District Society
Woburn Sands Town Council*
Wolverton & District Archaeological & Historical Society
Wolverton & District Senior Citizens Trust
Wolverton and Greenleys Town Council*
Wolverton Business Association
Wolverton District Archaeological Society
Wolverton Society for Arts & Heritage
Wolverton Unlimited
Wood Frampton
Woughton Parish Council*
WRAP
WRG
WSP Development
Wycombe District Council
Wyn Thomas Gordon Lewis
Yardley Gobion Parish Council*
Yardley Hastings Parish Council*
YMCA

* = Specific Consultation Bodies (see Statement of Community Involvement, p26) plus Parish Councils
HOW TO FILL IN THIS FORM

So that we have all the information we need to consider your views, you should use this form if you wish to comment on writing on the Core Strategy Preferred Options document. These notes are intended to help you fill in this form.

- Please complete the form in black ink or type as other colours do not photocopy well.
- Any comments should be clear and legible.
- All comments on the document will be available for anyone to see: we cannot treat your comments as confidential.
- For each question or policy direction please tick only one box.

PART 1
Your details
- Please fill in your name, address and other contact details as appropriate. It is important that we have your house number, street name, town and postcode to ensure that we can contact you regarding your comments.

PART 2
Agent details
- If you have an agent who is representing you - e.g. a planning consultant, surveyor or solicitor - they should fill out this form so please pass it on to them. All further letters will then be sent to your agent.
- If you are an agent, please fill in all parts of the form appropriately. Remember to give details of those you are representing.
- You do not need to use an agent to comment on the document. If you don’t have an agent, then leave this section of the form blank.

PARTS 3 & 4
- For each question or policy direction please tick only one box.
- If you need more space, please continue on a separate sheet with your name and organisation (as appropriate) clearly shown on the front page. For each comment please provide either the question number or policy direction reference.

Additional comments forms can be requested from the Development Plans Team and will be available from any library in the Borough and on the CD-ROM.

Please remember to sign and date the form and return it to us before the closing date. Proof of posting will not be taken as proof of receipt.
CONTACT INFORMATION

Please complete this form in black ink or type, using BLOCK CAPITALS.

PART 1: YOUR DETAILS
Mr/Mrs/Miss/Other: ……… Initial(s): ……… Surname:
Organisation: ……………………………………………………………………………………………………………………………
Address: ………………………………………………………………………………………………………………………………………
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………………………………………………………………………………………………………………………………………………
Telephone (daytime): ……… Fac. ……… E-mail: ……………………………………………………………………………………………
Did you comment on the previous Core Strategy, Issues and Options document? Yes/No (delete as appropriate)
If yes, please quote your respondent number (if known) …………………………………………………………………………

PART 2: AGENT’S DETAILS (WHERE APPROPRIATE)
Mr/Mrs/Miss/Other: ……… Initial(s): ……… Surname:
Organisation: ………………………………………………………………………………………………………………………………………
Address: …………………………………………………………………………………………………………………………………………………
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Town/City: …………………………………………………………………………………………………………………………………………………
Postcode: ……… Fax: ……… E-mail address: …………………………………………………………………………………………………………………

Signature: …………………………………………………………………………………………………………………………………………………
Date: …………………………………………………………………………………………………………………………………………………

The Data Protection Act, 1998 requires Milton Keynes Council to notify you that the information that you have given on this form, including personal information, will be held on a third party database. We cannot treat your comments on the Core Strategy Preferred Options document as confidential - all comments will be available for anyone to see at the Civic Offices or online through our new consultation system (Limehouse).

CUSTOMER FEEDBACK QUESTIONNAIRE

Core Strategy Background

The overall objective of the Core Strategy is for it to be a strategic document that provides a robust framework for guiding the development of Milton Keynes over the next 20 years. A wide range of issues is presented in the preferred options document. Some of these issues will be dealt with in other Development Plan Documents.

PART 3

Question 1 (Relates to the whole document)
Do you feel that the presented level of information is too detailed for the strategic document?

<table>
<thead>
<tr>
<th>Strongly Agree</th>
<th>Agree</th>
<th>No opinion</th>
<th>Disagree</th>
<th>Disagree Strongly</th>
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Comments: …………………………………………………………………………………………………………………………………………………

Question 2 (Relates to the whole document)
Do you feel that the Core Strategy should be a short document with a limited amount of policies?

<table>
<thead>
<tr>
<th>Strongly Agree</th>
<th>Agree</th>
<th>No opinion</th>
<th>Disagree</th>
<th>Disagree Strongly</th>
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Comments: …………………………………………………………………………………………………………………………………………………

Question 3 (Relates to the whole document)
Do you feel that the document is easy to read and clearly explains what will be happening in Milton Keynes?

<table>
<thead>
<tr>
<th>Strongly Agree</th>
<th>Agree</th>
<th>No opinion</th>
<th>Disagree</th>
<th>Disagree Strongly</th>
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Comments: …………………………………………………………………………………………………………………………………………………
Question 4 (See Page 9)
Do you agree that the Key Diagram shows the right amount of detail?

<table>
<thead>
<tr>
<th>Strongly Agree</th>
<th>Agree</th>
<th>No opinion</th>
<th>Disagree</th>
<th>Disagree Strongly</th>
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Comments: ............................................................................................................

Question 5 (See Page 22)
Do you agree with the vision?

<table>
<thead>
<tr>
<th>Strongly Agree</th>
<th>Agree</th>
<th>No opinion</th>
<th>Disagree</th>
<th>Disagree Strongly</th>
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Comments: ............................................................................................................

Question 6 (See Pages 26 – 27)
(Other questions provide the opportunity to comment on the specific policy directions for each of the preferred options objectives)
Do you agree with the objectives of the preferred options?

<table>
<thead>
<tr>
<th>Strongly Agree</th>
<th>Agree</th>
<th>No opinion</th>
<th>Disagree</th>
<th>Disagree Strongly</th>
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Comments: ............................................................................................................

Question 7 (See Page 32)
Are the reasons for setting the end of the Core Strategy period at 2026 right?

<table>
<thead>
<tr>
<th>Strongly Agree</th>
<th>Agree</th>
<th>No opinion</th>
<th>Disagree</th>
<th>Disagree Strongly</th>
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Comments: ............................................................................................................

Question 8 (See Page 32)
Are strategic reserves a good way of identifying potential development sites for the period after, and possibly before, 2026 if they are needed?

<table>
<thead>
<tr>
<th>Strongly Agree</th>
<th>Agree</th>
<th>No opinion</th>
<th>Disagree</th>
<th>Disagree Strongly</th>
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Comments: ............................................................................................................

Question 9 (See Page 36)
Does the document provide a clear picture of where change will happen and how it will occur?

<table>
<thead>
<tr>
<th>Strongly Agree</th>
<th>Agree</th>
<th>No opinion</th>
<th>Disagree</th>
<th>Disagree Strongly</th>
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Comments: ............................................................................................................

Question 10 (See Page 36)
Has the right balance been struck between growth within existing areas and in extensions to existing areas?

<table>
<thead>
<tr>
<th>Strongly Agree</th>
<th>Agree</th>
<th>No opinion</th>
<th>Disagree</th>
<th>Disagree Strongly</th>
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Comments: ............................................................................................................

Question 11 (See Page 36)
Are the broad areas identified for the urban extensions right?

<table>
<thead>
<tr>
<th>Strongly Agree</th>
<th>Agree</th>
<th>No opinion</th>
<th>Disagree</th>
<th>Disagree Strongly</th>
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Comments: ............................................................................................................

Page 58 of 222
Question 12 (See Page 38)
Is the delivery approach correct for the large number of dwellings required?

<table>
<thead>
<tr>
<th>Strongly Agree</th>
<th>Agree</th>
<th>No opinion</th>
<th>Disagree</th>
<th>Disagree Strongly</th>
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Comments

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Question 13 (See Pages 38 – 41)
Are the risks to the delivery of the housing and the solutions identified to overcome them right?

<table>
<thead>
<tr>
<th>Strongly Agree</th>
<th>Agree</th>
<th>No opinion</th>
<th>Disagree</th>
<th>Disagree Strongly</th>
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Comments

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Question 14 (See Page 43)
Is the amount of development proposed for the rural towns correct?

<table>
<thead>
<tr>
<th>Strongly Agree</th>
<th>Agree</th>
<th>No opinion</th>
<th>Disagree</th>
<th>Disagree Strongly</th>
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</table>

Comments

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Question 15 (See Page 45)
Are these the correct locations for the Strategic Reserve Areas?

<table>
<thead>
<tr>
<th>Strongly Agree</th>
<th>Agree</th>
<th>No opinion</th>
<th>Disagree</th>
<th>Disagree Strongly</th>
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</table>

Comments

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Question 16 (See Pages 138 - 140)
Are the suggested ways of identifying and delivering key pieces of infrastructure a good way to move forward?

<table>
<thead>
<tr>
<th>Strongly Agree</th>
<th>Agree</th>
<th>No opinion</th>
<th>Disagree</th>
<th>Disagree Strongly</th>
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</table>

Comments

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Question 17 (See Pages 141 – 151)
Are the specific projects identified in the schedule correct?

<table>
<thead>
<tr>
<th>Strongly Agree</th>
<th>Agree</th>
<th>No opinion</th>
<th>Disagree</th>
<th>Disagree Strongly</th>
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Comments

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Don't forget:

- For each question make sure you have ticked only one box.
- If you need more space for comments, please continue on a separate sheet with your name and organisation (as appropriate) clearly shown on the front page. The question number should be provided for each comment you make.
PART 4: Preferred Policy Directions

Please let us know if you agree or disagree with the Preferred Policy Directions of the Core Strategy below by placing a tick in the relevant box. Only one box should be ticked for each Preferred Policy Direction:

<table>
<thead>
<tr>
<th>Preferred Policy Direction</th>
<th>Strongly Agree</th>
<th>Agree</th>
<th>No opinion</th>
<th>Disagree</th>
<th>Disagree Strongly</th>
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<tbody>
<tr>
<td>MI 1 Creating carbon zero communities - Managing environmental impacts through the location of development</td>
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<tr>
<td>MI 2 Creating carbon zero communities - Managing environmental impacts through energy efficient design / zero carbon development</td>
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<td>MI 3 Creating carbon zero communities - Managing environmental impact through renewable energy provision</td>
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<td>MI 4 Managing our impact on local water resources</td>
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<td>MI 5 Efficient management of water - Managing demand for water</td>
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<td>MI 6 Reducing waste, landfilling and use of mineral resources</td>
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<td>MI 7 Reducing reliance on the car and encouraging travel by bus, cycle and on foot</td>
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<td>MI 8 Encouraging healthy lifestyles</td>
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<td>MOA 1 Protect and enhance the historical and cultural assets of the borough's historic assets</td>
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<td>MOA 2 Maintain and enhance green infrastructure and open spaces</td>
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<td>MOA 3 Protect and enhance the borough’s rural landscape</td>
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<td>MOA 4 Protect and enhance the biodiversity and geological resource of the borough</td>
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<td>ESRR 1 Create a knowledge based economy</td>
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<td>ESRR 2 Create a learning city and skilled workforce working in Milton Keynes</td>
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<td>ESRR 3 Support small and creative industries</td>
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<tr>
<td>Preferred Policy Direction</td>
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<tr>
<th>Preferred Policy Direction</th>
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Comments

Please use the space provided on the next page to make comments on any of the Preferred Policy Directions. The relevant Preferred Policy Direction code should be stated (as provided above). If you need additional space, you can photocopy the next page. Please ensure your name and organisation (as appropriate) is clearly shown on the front page.
<table>
<thead>
<tr>
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**Preferred Policy Direction Code:**

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**Preferred Policy Direction Code:**

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**Preferred Policy Direction Code:**

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<th>Description</th>
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Thank you for completing this questionnaire. Analysis of the questionnaire will be published and placed on our website, shortly after the end of the consultation period.

When you have completed the form, please send it to us using our FREEPOST address (NO STAMP NEEDED):

Development Plans Team, Milton Keynes Council, FREEPOST NATE 264, Planning, LUTS, Civic Offices, 1 Saxon Gate East, Central Milton Keynes, MK9 3HQ

Your form must arrive no later than 5.30 pm on Thursday, 8 November 2007

For more information please contact the Development Plans Team on 01908 252599 or by email: development.plans@milton-keynes.gov.uk
Dear Sir/Madam

MILTON KEYNES CORE STRATEGY, PREFERRED OPTIONS, SEPTEMBER 2007

Milton Keynes Council has published its Core Strategy document for a six-week period of public consultation from Thursday 27 September to Thursday 8 November 2007.

The Core Strategy is an important document, which forms part of the Council’s Local Development Framework (LDF). When adopted by the Council, it will set out the vision, objectives and strategy for the development of the borough up to 2026. The Core Strategy will form the basis of all new planning policies that the Council will apply in future.

Please find a CD-ROM enclosed with this letter. The CD-ROM contains a copy of the Core Strategy Preferred Options document, Sustainability Appraisal, Comments Form and Monitoring Information Form.

You will be able to view the Core Strategy Preferred Options document and make and view comments online, using our new consultation system, Limehouse at: http://consultation.limehouse.co.uk/milton-keynes/drafts/8/index.html.

Comments made will be automatically acknowledged through email (if a valid email address has been provided) or alternatively in writing.

Reference copies of the Core Strategy, Sustainability Appraisal and other supporting documentation are available to view at the Council’s Civic Offices, 1 Saxon Gate East, Central Milton Keynes, MK9 3HQ during normal office hours (9.00 am to 5.15 pm, Monday to Friday).

All libraries within the borough (opening times vary) will also hold reference copies of the Core Strategy Preferred Options document and Sustainability Appraisal. The location and opening times of your nearest library can be found on our website at: http://www.milton-keynes.gov.uk/library%5Fservices/DisplayArticle.asp?ID=28715

If you prefer to comment in writing, you will need to fill in a Comments Form. This will ensure that the Council has all the information needed to process any representation you wish to make. Copies of the Comments Form are available from all libraries within the borough or by contacting the Development Plans Team

25 September 2007
Completed Comments Forms should be returned to the Development Plans Team, using our freepost address (no stamp needed): Development Plans Team, Milton Keynes Council, FREEPOST NATE 294, Planning, LUTS, Civic Offices, 1 Saxon Gate East, Central Milton Keynes, MK9 3HQ. Receipt of comments made in writing will be acknowledged.

All comments on the Core Strategy Preferred Options must be received by the Development Plans Team no later than 5.30pm on Thursday 8 November 2007.

Following consideration of any duly made comments received on the Core Strategy Preferred Options document and the Sustainability Appraisal, the Council will be preparing a final version of these documents for submission to the Government in early 2008.

If you have any questions on this letter, please do not hesitate to contact the Development Plans Team.

Yours faithfully

Michael Moore
Senior Planning Officer, Development Plans

Enc
B4  SAMPLE LETTER – GENERAL AND OTHER CONSULTATION BODIES

Brian Sandom  
Corporate Director Environment

David Hackforth  
Head of Planning and Transport

Our Ref: LDF/12  
Reply To: Development Plans  
Direct Line: (01908) 252599  
E-Mail: Development.Plans@milton-keynes.gov.uk

25 September 2007

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If you have any questions on this letter, please do not hesitate to contact the Development Plans Team.

Yours faithfully

Michael Moore
Senior Planning Officer, Development Plans
Background

I. Consultation Process

1. Public Engagement

Milton Keynes Council (MKC) recently sought opinion on the development strategy to 2026 for Milton Keynes. This was laid out in the Core Strategy – Preferred Options (CS-PO) paper, the key document to the Milton Keynes Local Development Framework (LDF). Following the approval of both the MKC Cabinet and South East Plan (SEP) Panel, the CS-PO was sent to stakeholders for comment.

A total of 230 parties submitted 3,575 responses, of which, 221 respondents made 1,520 detailed literal responses about the strategy. Respondents could comment, by means of an online or paper form, on the document in its entirety, or individual sections relating to specific Council directions called Preferred Policy Directions (PPDs). In addition, there were 17 questions posed throughout the CS-PO relating to the content of the policy directions for each of the Preferred Options and the level of detail provided in the CS-PO as a whole.

The Council required an independent review of the submissions, discounting the 2,055 multiple choice responses, which was carried out by Ubiquus.
2. **Ubiquis’ Role**

Ubiquis is an independent, private communications company with no affiliation, either formal or informal, to MKC or any related department, body or representative. Ubiquis has no connection with any of the respondents to the consultation.

II. **Analysis Overview**

1. **Consultation Documents**

The CS-PO was intended specifically for public consultation, the outcome of which will feed into the Submission version along with the modifications necessitated by the Secretary of State for Communities and Local Government. This document detailed the spatial strategy between 2011 and 2026 for the Milton Keynes area, including proposed directions of growth, quantity of housing, infrastructure development, community sustainability and the impact of the changing urban and rural landscapes on Milton Keynes’ residents.

The document stressed that its purpose was to provide direction and objectives for spatial planning, but not a plan. The level of detail in the document was a point on which feedback was sought and this is broadly outlined at the start of the analysis, in the Full Document section of this analysis.

2. **Questioning**

In addition to allowing participants to submit open-ended remarks, questions were contained within the CS-PO to guide respondents’ comments. The chapters *Managing Our Impacts*, *Managing Our Assets*, *Supporting the City’s Economy and Sub-Regional Role*, *Serving Existing Communities* and *Growing New Communities* contained no questions; however, they outlined the PPDs, delivery mechanisms, risks to delivery, and targets and indicators, which formed the basis of the questions in the final section on *Implementation, Delivery & Risk*. Respondents were asked the following:

**Full Document – General Questions**

- Question 1: Do you feel that the presented level of information is too detailed for the strategic document?
- Question 2: Do you feel that the Core Strategy should be a short document with a limited number of policies?
- Question 3: Do you feel the document is easy to read and clearly explains what will be happening in Milton Keynes?

**Full Document – Key Diagram**

- Question 4: Do you agree that the Key Diagram shows the right amount of detail?

**Chapter 2 – Spatial Vision**

- Question 5: Do you agree with the vision?

**Chapter 3 – Spatial Objectives**

- Question 6: Do you agree with the objectives of the Preferred Options?

**Chapter 4 – Determining Our Growth**

- Question 7: Are the reasons for setting the end of the Core Strategy period at 2026 right?
- Question 8: Are Strategic Reserves a good way of identifying potential development sites for the period after, and possibly before, 2026 if they are needed?
- Question 9: Does the document provide a clear picture of where change will happen and how it will occur?
Question 10: Has the right balance been struck between growth within existing areas and in extensions to existing areas?

Question 11: Are the broad areas identified for the urban extensions right?

Question 12: Is the delivery approach correct for the large numbers of dwellings required?

Question 13: Are the risks to the delivery of the housing and the solutions identified to overcome them right?

Question 14: Is the amount of development proposed for the rural towns correct?

Question 15: Are these the correct locations for the Strategic Reserve areas?

Chapter 10 – Implementation, Delivery & Risk

Question 16: Are the suggested ways of identifying and delivering key pieces of infrastructure a good way to move forward?

Question 17: Are the specific projects identified in the schedule correct?

3. Ubiquus’ Methodology

Ubiquus’ analysis team read each literal response logged by MKC and categorised the responses according to the key theme(s) and sub-theme(s) arising from each response, in order to draw general conclusions. These key themes are identified below in the Key Themes section. The majority of responses related to more than one theme or sub-theme and all relevant topics were registered. A further measurement of the literal responses was made by considering the comment as more or less in favour of the section to which it referred. For example, a response agreeing to the principle of a section and mentioning areas of concern or improvement would be designated ‘Support’ and the appropriate points mentioned would be noted under the theme or sub-theme. Where the respondent did not indicate ‘Support’ or raise an ‘Objection’, the comment was described as requiring ‘More Information’ or simply ‘No Comment’ depending on the content of the answer.

4. Document Structure and Conventions

The analysis followed the structure of the CS-PO in that comments were grouped together for the full document, for each of the 10 chapters and their PPDs, and for each of the 17 questions. The literal responses for the questions will be discussed in this document under the chapter in which they appeared in the CS-PO. Only Chapters 4-9 contain PPDs.

This document looks at the results in both qualitative and quantitative terms. It also uses quotations from the literal responses to illustrate certain points and opinions. Quotations will only be attributed where they were submitted by organisations, and not by private individuals.

Where data is given in percentages, it has been rounded to the nearest 0.1%.

Outline of Responses

I. Respondent Overview

It should be noted that respondents were not a controlled sample. A variety of stakeholders submitted their views and these were grouped by MKC according to the institution type. There were seven such groups: executive agencies, non-departmental public bodies and public corporations; landowners and developers; local, national and regional government; private sector organisations; service providers; voluntary sector, not-for-profit organisations and pressure groups; private individuals. Responses did not come in equal number from these groups; indeed, the opinions cannot necessarily be deemed representative of the population as a whole, given the sample size and the fact that many respondents that had been invited to comment would have done so from having a particular interest.
II. Respondent Breakdown and Type

Landowners and developers represented the highest proportion of literal responses in terms of respondent type, with 36.6% of the 1520 responses coming from this group. However, in this category, there were 48 responding parties; the high number of literal responses, 556 in total, resulted from the fact that the same respondents chose to comment on a number of areas of the document or answer several questions. In addition, for this respondent type in particular, some literal responses were duplicated on different parts of the form and the same response was registered for more than one chapter or question. The next most well-represented respondent groups were private individuals, followed by local, national and regional government, and then voluntary, not-for-profit organisations and pressure groups, with 301 (19.8%), 281 (18.5%) and 210 (13.8%) literal responses respectively.

The final three categories made up the remaining 11.3% of literal responses, private sector organisations having submitted four responses (0.3%), service providers giving a total of 77 responses (5.1%) and executive agencies, non-departmental public bodies and public corporations providing 91 literal responses (5.9%).

The below chart shows the numbers of responses given by each category of respondent:
III. Questions Answered  

Not every respondent provided a comment on every section of the CS-PO. The following table shows the number and percentage of respondents who provided views on each section, including the questions that fall into each chapter, in descending order:

<table>
<thead>
<tr>
<th>Section</th>
<th>Number of responses submitted</th>
<th>Percentage of responses (of the total received)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Full Document (includes General Questions 1-3 and Key Diagram Question 4)</td>
<td>200</td>
<td>13.60%</td>
</tr>
<tr>
<td>Chapter 1 – Introduction</td>
<td>12</td>
<td>0.79%</td>
</tr>
<tr>
<td>Chapter 2 – Spatial Vision (includes Question 5)</td>
<td>57</td>
<td>3.75%</td>
</tr>
<tr>
<td>Chapter 3 – Spatial Objectives (includes Question 6)</td>
<td>47</td>
<td>3.09%</td>
</tr>
<tr>
<td>Chapter 4 – Determining Our Growth (includes Questions 7-15)</td>
<td>518</td>
<td>34.08%</td>
</tr>
<tr>
<td>Chapter 5 – Managing Our Impacts</td>
<td>151</td>
<td>9.93%</td>
</tr>
<tr>
<td>Chapter 6 – Managing Our Assets</td>
<td>117</td>
<td>7.70%</td>
</tr>
<tr>
<td>Chapter 7 – Supporting the City’s Economy and Sub-Regional Role</td>
<td>98</td>
<td>6.45%</td>
</tr>
<tr>
<td>Chapter 8 – Serving Existing Communities</td>
<td>112</td>
<td>7.37%</td>
</tr>
<tr>
<td>Chapter 9 – Growing New Communities</td>
<td>148</td>
<td>9.74%</td>
</tr>
<tr>
<td>Chapter 10 – Implementation, Delivery &amp; Risk (includes Questions 16-17)</td>
<td>60</td>
<td>3.95%</td>
</tr>
</tbody>
</table>
IV. Weighting of Objection versus Support

For the entire consultation, objection and support are fairly evenly weighted, with 49.2% of responses raising an objection compared to 48.5% declaring support. However, this is not representative of opinion in each section, certain PPDs and questions having a more definite outcome. By way of example, the below graph shows the questions that were more evenly split, and those which drew an explicit conclusion. The bars labelled ‘No’ and ‘More’ relate to the answers ‘No Comment’ and ‘More Information’.

Another example of the difference in weighting of various parts of the strategy comes from comparing Chapters 5-9. These are the chapters containing responses on the whole chapter, the policy directions and the Delivery Strategies, Risks, and Targets and Indicators. When these elements are added together, the overall support versus objection can be viewed by chapter. The table below compares this data. It should be borne in mind that some responses given were recorded as ‘No Comment’ or ‘More Information’. For this reason, the below percentages do not necessarily combine to represent 100% of respondents from each group and should only be considered in comparing declarations of agreement or disagreement with the chapter content:

<table>
<thead>
<tr>
<th>Section</th>
<th>Support (as a percentage of all responses)</th>
<th>Objection (as a percentage of all responses)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chapter 5 – Managing Our Impacts</td>
<td>59%</td>
<td>41%</td>
</tr>
<tr>
<td>Chapter 6 – Managing Our Assets</td>
<td>66.7%</td>
<td>33.3%</td>
</tr>
<tr>
<td>Chapter 7 – Supporting the City’s Economy and Sub-Regional Role</td>
<td>42%</td>
<td>58%</td>
</tr>
<tr>
<td>Chapter 8 – Serving Existing Communities</td>
<td>64%</td>
<td>36%</td>
</tr>
<tr>
<td>Chapter 9 – Growing New Communities</td>
<td>73.6%</td>
<td>25%</td>
</tr>
</tbody>
</table>

Additionally, certain respondent groups were more receptive to the consultation document and its parts than others. This was shown by the proportions of each group raising concerns versus the quantity voicing support. For example, 78.4% of private individuals had some form of objection contained within the 301 literal responses, and 18.9% supported the area of the consultation document on which they were commenting. On the other hand, 75.3% of service providers supported the CS-PO and 18.2% made comments against elements of the document; many of the comments lending support were suggestions of ways to improve the strategy and requests to engage when MKC begins the implementation stage. The following graphs show the weighting of support versus objection for all respondent groups:
Key Themes

The following key themes and sub-themes were used in the quantitative analysis:

**Development Location/Direction:**
- South-west development
- South-east development
- North development
- Central Milton Keynes development
- Monitoring and balanced growth
- Strategic Reserves
- Cross-boundary development issues
- Newton Longville objection
- Other

**Housing:**
- Quantity too high
- Quantity too low
- Greenfield objection
- Density
- Delivery
- Affordable housing
- Design
- Other

**Infrastructure:**
- Timing
- Cost
- Spatial planning & green infrastructure
- Education
- Health
- Utilities
- Retail
- Leisure
- Community facilities
- Waste facility
- Pedestrian & cycling routes
- Heritage & character
- Other

**Transport:**
- Roads
- Congestion
- Public transport
- East-West Rail project
- Other

**Environment:**
- Countryside
- Biodiversity
- Landscape designations
- Sustainable Development
- Brownfield
- Other

**Social Cohesion and Community:**
- Coalescence
- Quality of life
- Other

**Economic Development:**
- Employment
- Job creation
- Business involvement & land use
- Other

**Consultation:**
- Timing
- Documentation
- Other

**Other:**
- Villages
- Rural development
- Milton Keynes growth potential
- Regional policy
- Policy content
- Evidence
- Wording
Key Themes Breakdown

I. Key Themes and Sub-Themes by Chapter

For each chapter, the key areas of comment will be discussed. Key themes and sub-themes can be drawn out from these and observations on which themes came through for the strategy as a whole are contained in the Cross-Cutting Themes section. Certain questions received a sufficient level of responses that thematic analysis can be carried out on these; despite Questions 1-17 being closed questions and gaining many responses that only accepted or rejected the area of strategy, with a high enough number of answers, themes came through more convincingly. The questions with breakdown by sub-theme are Questions 5, 11 and 14.

II. Key Theme and Sub-Theme by Respondent Type

Different topics came out as important for certain stakeholders. The most frequently occurring key themes and sub-themes have been broken down by respondent group below.

The key theme that was declared most often for each stakeholder type was: Transport for respondent group Executive Agencies; Transport for Individuals; Other for Landowners; Infrastructure for Government; Infrastructure for Service Providers; Infrastructure for Voluntary Sector Organisations; Infrastructure for Private Sector Organisations.

The most frequently mentioned sub-theme for each respondent group was: Public Transport for Executive Agencies; Roads for Individuals; Evidence for Landowners; Public Transport for Government; Other (Infrastructure) for Service Providers; Policy Content for Voluntary Sector Organisations; Sustainable Development for Private Sector Organisations.

III. Executive Agencies, Non-Departmental Public Bodies and Public Corporations

For Executive Agencies, Transport gained 31 responses (34.1% of the comments for this group referring to this sub-theme), followed by Other, for which there were 26 responses (28.5%) and then Infrastructure with 24 responses (26.4%). Within the key theme of Transport, Roads and Public Transport were referred to the most. The sub-themes Policy Content and Evidence were addressed eight times each as well, under the category Other.

IV. Individuals

The predominant key theme coming out of the responses given by the Individuals category was Transport, with 52 responses. This equates to 17.3% of all responses in the Individuals respondent group. Other had 49 responses (16.3%). Location of Growth was the third most pressing concern for this group, 37 comments referring to these issues (12.3%). This was closely followed by Infrastructure, Environment and Housing themes, with 35 (11.6%), 33 (11%) and 30 (10%) responses respectively.

Despite Transport receiving the highest number of comments in total, sub-themes in other key theme categories received more responses than the Transport sub-themes, other than Roads, for which there
were 16 responses (5.3%). For example, 13 responses (4.3%) referred to Sustainable Development within Environment, while 12 people (4%) thought Policy Content within Other was important. Employment under Economic Development was another sub-theme deemed critical by 13 respondents (4.3%).

V. Landowners and Developers

Other was the key theme referred to most by the Landowners and Developers category. 119 responses (21.4%) referred to a sub-theme under this key theme, with 39 responses (7% of all Landowners’ and Developers’ responses) referring to the sub-theme Evidence. Infrastructure was the second most common key theme, 95 responses (17%) having brought up a matter of infrastructure. Transport was mentioned 78 times (by 14% of responses) and the key theme Housing was referred to on 76 occasions (13.7%). The sub-themes in Transport, Public Transport and the East-West Rail Project gained 25 and 26 remarks respectively.
VI. Local, National and Regional Government

Within this category of respondents, the highest number of comments referred to Infrastructure; 27% of responses referred to Infrastructure, with Spatial Planning and Community Facilities receiving 13 responses each (4.6%).

In the key theme Other, Villages (12 responses), Policy Content (11), Evidence (10) and Wording (10) were the major sub-themes arising.

Transport was the third most mentioned key theme, with over 19.6% of responses pertaining to these issues; Roads, Congestion, Public Transport and East-West Rail Project all scored highly.

\[ 	ext{Infrastructure Responses} \]

<table>
<thead>
<tr>
<th>Theme</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Timing</td>
<td>3</td>
</tr>
<tr>
<td>Cost</td>
<td>6</td>
</tr>
<tr>
<td>Heath</td>
<td>4</td>
</tr>
<tr>
<td>Education</td>
<td>11</td>
</tr>
<tr>
<td>Utilities</td>
<td>3</td>
</tr>
<tr>
<td>Heritage &amp; Character</td>
<td>7</td>
</tr>
<tr>
<td>Retail</td>
<td>3</td>
</tr>
<tr>
<td>Leisure</td>
<td>4</td>
</tr>
<tr>
<td>Community Facilities</td>
<td>13</td>
</tr>
<tr>
<td>Waste Facility</td>
<td>1</td>
</tr>
<tr>
<td>Pedestrian routes &amp; Redway</td>
<td>3</td>
</tr>
<tr>
<td>Planning &amp; green infrastructure</td>
<td>13</td>
</tr>
<tr>
<td>Other</td>
<td>5</td>
</tr>
</tbody>
</table>

VII. Service Providers

Again, Infrastructure came out as the main key theme for the Service Provider section, comments mainly falling under Other, as they related to consultation on safety for infrastructure. Almost 36.4% of comments received from service providers were on this subject. Social Cohesion received 13 responses (16.9%). Transport and Environment did not come up in the responses for this respondent group.

VIII. Voluntary, Not-For-Profit Organisation or Pressure Group

Infrastructure gained 68 responses and was the most frequently occurring key theme; 32.4% of the Voluntary Sector’s responses referred to this key theme. Education, and Spatial Planning and Green Infrastructure were the two sub-themes within Infrastructure that came up most often in this category.

Policy Content, Evidence and Wording were the sub-themes within Other that received the most attention, with 20, 19 and 16 responses respectively. This shows that the Voluntary, Not-For-Profit Organisation and Pressure Group category was more concerned with the background to the consultation document and the evidence base and consultation on which it had been formed, as opposed to the content itself.

With 42 responses (20%) remarking on Economic Development, it was the third most common key theme to feature. More than 5.2% of responses remarked on elements of employment and skills. Employment received 19 comments (9%).

\[ 	ext{Economic Development Responses} \]

<table>
<thead>
<tr>
<th>Theme</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Employment (General)</td>
<td>19</td>
</tr>
<tr>
<td>Job creation</td>
<td>4</td>
</tr>
<tr>
<td>Business involvement &amp; Land use</td>
<td>8</td>
</tr>
<tr>
<td>Other</td>
<td>11</td>
</tr>
</tbody>
</table>

\[ 	ext{Other Responses} \]

<table>
<thead>
<tr>
<th>Theme</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Villages</td>
<td>1</td>
</tr>
<tr>
<td>Rural development</td>
<td>5</td>
</tr>
<tr>
<td>Policy content</td>
<td>20</td>
</tr>
<tr>
<td>Evidence</td>
<td>19</td>
</tr>
<tr>
<td>Wording</td>
<td>36</td>
</tr>
<tr>
<td>Milton Keynes growth potential</td>
<td>2</td>
</tr>
<tr>
<td>Regional policy</td>
<td>2</td>
</tr>
</tbody>
</table>
IX. Private Sector Organisations

Very few themes were addressed by these organisations, in comparison to the other respondent groups, as only four literal responses were received on behalf of three bodies.

Full Document

I. Overview

58 people (3.8% of responses) chose to comment generally on the entire CS-PO. This was an opportunity for consultation participants to give their views on the level of detail contained in the strategy document, the depth of the strategy, whether anything had been omitted or too much included, the clarity of the document and the role of MKC in the strategy. Opinion was slightly more objectionable than favourable, with 32 of the 58 responses (55.2%) putting forward objection. Nine of these objections (28%) were raised by developers and landowners and 10 were raised by individuals (31.3%).

II. Key Areas of Comment

1. Nature of Responses

Since the respondents were commenting on the document as a whole, there was no one key theme that stood out, and almost every aspect of the strategy was addressed by respondents. Respondents also chose to not focus on the way the document was written, instead commenting globally on what the MKC was proposing to do and encompassing many of the key themes into their lengthier answers.

2. Main Issues Raised by Objectors to the Document

Objectors pointed to contradictions in the strategy, as well as flaws in how it encompasses related national and regional strategy for growth, such as that outlined in the SEP. Buckinghamshire County Council, for instance, was ‘extremely disappointed that the Core Strategy –Preferred Options document has been drafted in the context of Milton Keynes Council’s submission to the South East Plan Examination in Public (EIP), and does not reflect the significant changes that the panel has recommended in its report to Government’.

While there were some concerns raised about the lack of Council ambition and the fact the strategy would fall short of the vision in terms of providing adequate housing, others argued that such a level of growth would destroy the character of Milton Keynes. By way of example, it was highlighted that ‘Building all these homes suggested within the city boundary would destroy the successful character of Milton Keynes, and would lead to a break-up of the grid system.’ Those in favour of expansion, however, thought that the strategy did not go far enough in promoting growth for Milton Keynes.

Finally, there were objections raised over the likelihood of delivery and implementation: ‘We will not be able to meet targets … unless we address the issue of additional human resources’. The South East England Development Agency (SEEDA) contributed several major concerns on ‘the problems in delivery of allocated housing numbers’, while supporting the CS-PO document overall.

3. Main Issues Raised by Supporters of the Document

Particularly welcomed were the notions of increasing the amount of green space within Milton Keynes, ‘high standards of urban design’, improved transport infrastructure, community building and sustainable development. On the latter, the East Midlands Regional Assembly indicated, ‘There is a clear emphasis on sustainable development, which accords with the 10 core objectives set out in Policy 1, and the design criteria in Policy 3, of the draft Regional Spatial Strategy (RSS)’.
It should be noted that only one private individual made predominantly positive comments about the full
document and many of the respondents were organisations such as developers and service providers
requesting involvement at the time of implementation.

III. General Questions

Question 1

34 parties responded to the question ‘do you feel that the presented level of information is too detailed
for the strategic document?’ 18 responses (52.9%) suggested the level of information was either too
detailed or insufficient, 13 people (38.2%) thought that MKC had the balance right between enough detail
and clarity, and three parties answered the question but wished to express no strong view either in favour
or against the level of detail in the strategy. It was deemed important to have detail ‘to guide the
formation of other documents’ and plans. However, there were calls for a more accessible and succinct
version, because the CS-PO as it is currently written ‘requires a prior knowledge of current strategies’. In
this regard, the Executive Summary section was complimented.

Conversely, there were several suggestions to include wider information on the evidence base and one
individual wished for the strategy to take account of feedback from prior consultations.

Policy content, Wording and Evidence were the predominant sub-themes in this question, with 17, 6 and 6
literal responses respectively.

Question 2

In reply to the question ‘do you feel that the Core Strategy should be a short document with a limited
number of policies?’ there were 32 responses. There were 18 indications of support (56.2%) and 14
objections (43.8%) to the Core Strategy having a limited number of policies. It was agreed by both the
objectors and supporters that the strategy needed an appropriate number of policies; it must ‘be of
sufficient length … and covering all the important issues; its length and number of policies are a function
of this, rather than an arbitrary judgement about length and number of policies.’

Question 3

Question 3 asked: ‘Do you feel the document is easy to read and clearly explains what will be happening in
Milton Keynes?’ Almost twice as many respondents (63%) did not find the document readable or
explained what would take place in Milton Keynes, than supported the claim that it was easy to read
(33%). Criticisms included that the document is ‘fragmented’, ‘not easily read’ and ‘rather misleading and
unclear in context’. There was mention that further planning definitions should be included in the
Glossary, notably, ‘spatial vision’ and ‘green infrastructure’.

IV. Key Diagram

Question 4

69.5% of the 46 literal responses to Question 4 denied that the Key Diagram contained the appropriate
amount of detail. Among others, omissions cited in the replies were: the strategic road network; green
spaces and the linear park extension; the proper extent of the south-east growth area; proposed stations
on the East-West rail link.

Those who agreed that the Key Diagram was sufficient (28%) mainly did so in the context of the broad
spatial strategy and noted that more detail would be required as it becomes available. Several of these
responses recognised that the Key Diagram was illustrative only.

There was one More Information response requesting that more geographical locations, and certainly all
those referenced in the CS-PO, were added. This is consistent with points made by some of the objecting
respondents, who identified specific locations for inclusion on the spatial response.
Chapter 1: 
Introduction

I. Overview
This section was commented upon the least. There were six literal responses on Chapter 1 and six section-specific responses relating to this section of the strategy. Five of the six general comments supported the content of the Introduction and mainly addressed the key themes Consultation and Other. Likewise, five of the six section-specific comments were favourable, although four of the comments in this section came from one single service provider.

II. Key Areas of Comment
Respondents took the opportunity to raise individual concerns. Responses welcomed the definition of spatial planning, ‘effective community engagement’ and the references that the Introduction made to the growth potential of Milton Keynes. 33.3% of responses (two responses) referred to the sub-theme Milton Keynes Growth Potential, and a different 33.3% of responses focussed on the overall Policy Content and how the strategy had been put together.
Again, there was note that the strategy had to join up and avoid conflict with various other strategic documents the: Local Plan; Mid-Bedfordshire Preferred Option-Core Strategy; SEP and its EIP Panel Report; Milton Keynes and South Midlands Sub-Regional Strategy (MKSM SRS); Local Area Agreements (LAA); emerging RSS; Sustainable Community Strategy (SCS) as used by service providers.

Chapter 2: 
Spatial Vision

I. Overview
There were no general comments on Chapter 2, which described MKC’s view of the future development of Milton Keynes. However, respondents were asked for their opinions on the spatial vision specifically, which is incorporated into Question 5.

II. Questions

Question 5
a. Responses on the Spatial Vision
Of the 57 replies to the question regarding MKC’s vision for the city, 27 disagreed (47%) and 30 agreed (53%).
Of those objecting, six were individuals (10.5%), seven landowners or developers (12.3%), eight were local, regional or national government (14%) and six were voluntary organisations, not-for profit and pressure groups (10.5%). Half of the respondents agreeing were landowners or developers, and only two individuals supported the Council’s Spatial Vision.

b. Support
Several positive references were made to the Council’s impression of Milton Keynes as an ‘iconic city’, noting the aspiration of Milton Keynes that appeared ‘to envisage a more significant role for elected town and parish councils than is currently the case’. It was stressed that Milton Keynes’ individuality and dynamism must be preserved by three respondents (5.3%).
Service provider respondents also wished to highlight the critical need to include safety in the Vision as ‘safety is one of the prerequisites for an excellent quality of life.’
Supporters wished to reference other elements in the Vision, particularly: ‘opportunities for the arts and cultural sector to grow’; ‘provision and maintaining of green and open spaces and management of the countryside and rural areas’; ‘attainment of high levels of energy and resource efficiency’; ‘creating a safe environment’; development being located within and adjacent to the city of Milton Keynes as a means of minimising travel distances’; the SEP.

It can be seen from this that stakeholders’ interests were diverse, reflecting the mix of respondent types for this question, although it is noted that four supporters (7% of responses) made mention that the development should focus on the edge of the city and that this should be incorporated in the Spatial Vision.

c. Objection

Seven responses (12.3%) rejected the description of Milton Keynes as a city, or region, stating that it is a new town and MKC should not lose sight of this. It was thought that while Milton Keynes may aspire to be ‘...a city ... an area, a region...’, as yet it was none of these things. Three responses further highlighted that the vision for the market towns and rural areas was ‘uninspiring’ and had been overlooked, while the city had been given priority on the wording: ‘This is principally a Vision for Milton Keynes City.’ One respondent specified Newport Pagnell as a location that had been overlooked.

Further concerns were highlighted around the sustainable development and the environment by five participants (8.8%), notably that there was doubt that the modal shift from car to public transport, as mentioned later in the consultation document, would be viable and therefore the claim that ‘spatial planning will contribute to reducing our carbon emissions’ was questioned, as was the likelihood of Milton Keynes being a green city.

d. Key themes

While there appeared to be much variety in the interests of participants of the consultation, there were key themes that came out of the answers to this question due to the number of responses, Question 5 being the third most answered question.

The table below shows the number of times each key theme was recorded in the responses to this question:

<table>
<thead>
<tr>
<th>Key theme</th>
<th>Responses</th>
<th>Percentage of all responses referring to theme</th>
</tr>
</thead>
<tbody>
<tr>
<td>Development Location/Direction</td>
<td>14</td>
<td>24.6%</td>
</tr>
<tr>
<td>Housing</td>
<td>14</td>
<td>24.6%</td>
</tr>
<tr>
<td>Infrastructure</td>
<td>35</td>
<td>61.4%</td>
</tr>
<tr>
<td>Transport</td>
<td>13</td>
<td>22.8%</td>
</tr>
<tr>
<td>Environment</td>
<td>8</td>
<td>14%</td>
</tr>
<tr>
<td>Social Cohesion and Community</td>
<td>6</td>
<td>10.5%</td>
</tr>
<tr>
<td>Economic Development</td>
<td>6</td>
<td>10.5%</td>
</tr>
<tr>
<td>Consultation</td>
<td>0</td>
<td>0%</td>
</tr>
<tr>
<td>Other</td>
<td>23</td>
<td>40.4%</td>
</tr>
</tbody>
</table>

This clearly shows that the major concern for the question on MKC’s Spatial Vision was Infrastructure. Other, Housing, Transport and the Direction and Location of Development followed. Within these key themes, some narrower issues were addressed. The numbers of comments for these sub-themes are shown on the graphs below:
Chapter 3:
Spatial Objectives

I. Overview

There were no general comments on Chapter 3, which gives a more concrete list of priorities for developing Milton Keynes by outlining the objectives for the Preferred Options that appear in the following six chapters. Respondents were asked if they agreed with the objectives, and told that they would have the opportunity to comment on individual PPDs for each objective at the applicable point in the document. Respondents’ agreement or disagreement is detailed below.

II. Questions

Question 6

a. Responses on the Spatial Objectives

The development objectives relating to each of Chapters 4-10 were laid out in tabular form. More detail was given in the chapters themselves along with the policy directions of how to achieve them. The objectives were:
Determining Our Growth: set the timescale for the Core Strategy; identify broad directions of Growth; identify a strategy for the rural area; monitoring housing delivery and Strategic Reserve Areas.

Managing Our Impact: create carbon zero communities; efficient management of water; reduce waste, land-filling and use of mineral resources; reduce reliance on the car by encouraging travel by bus, cycle and on foot; encouraging healthy lifestyles.

Managing Our Assets: protect and enhance the historical and cultural assets of the New Town and the towns, villages and countryside beyond; maintain and enhance green infrastructure and open spaces; protect and enhance the borough’s rural landscape; protect and enhance the biodiversity and wildlife resource.

Supporting the City’s Economy and Sub-Regional Role: create a knowledge-based economy; create a learning city and a skilled workforce working in Milton Keynes; support small and creative industries; create new sporting facilities of national significance; enhance central Milton Keynes as a major office, retail and cultural location; increase access to services locally; increase housing delivery for market homes, affordable housing, and housing for minority and ethnic groups; enhance existing areas where there are regeneration opportunities that are supported by local people; reduce health inequalities and deprivation in the worst-ranked areas; ensure balanced growth of the city; balance growth of the city with the delivery of key infrastructure.

Serving Existing Communities: ensure balanced growth; create a safe environment; create flexible and supportive living space; increase housing delivery for market homes, affordable housing, and housing for minority and ethnic groups; balance growth of the city and existing areas and pressures; balance growth of the city and necessary infrastructure.

Growing New Communities: ensure that the Core Strategy co-ordinates and integrates policies for the development and use of land with other policies and programmes; ensure that infrastructure provision keeps up with the delivery of planned growth; provide the framework to align investment decisions made by a range of organisations in Milton Keynes.

As the objectives were varied, most people commenting chose to refer to one or two specific areas of the objectives. Overall, support was lent to the spatial objectives by 70.2% of the 47 parties responding to this question, and 29.8% were against them.

b. Support

Particularly, the objectives in the table for Managing Our Assets drew considerable support, being mentioned in many supporters’ responses as ‘essential’ and ‘welcome’ because they address environmental criteria. One response said that the objectives under this section should encompass ‘managing our highway and transport assets’. In fact, transport was a strong theme throughout the responses in this section.

Under support, mention was also made of communities, both existing and new. While the inclusion of communities in the objectives was supported in general, there were three specific comments suggesting that these objectives fell short of what is required.

Supporters also recognised that resources would be an issue for maintaining current infrastructure. Furthermore, two people thought it important to highlight that development should be balanced across the Milton Keynes area.

c. Objection

On the objection side, transport was also central to debate, as seven of the 14 objections referred to transport at least once. The grid system and roads, as well as public transport, were key areas of concern. Referring to the ‘ambiguity over direction of transport policy’, the Highways Agency suggested additional objectives in this respect, but did not give an indication of where they would fit.
Chapter 4: Determining Our Growth

I. Overview

Chapter 4 received the largest proportion of comments on the strategy document. There were 518 responses in all, made up of five for the Chapter and 513 for Questions 7-15. The question with the highest number of responses was Question 11: ‘Are the broad areas identified for the urban extensions right?’ The fact that this received the most replies indicates that participants in the consultation believed the direction of growth to be a serious issue. This question received 130 replies. Following this, Question 14 received the second highest proportion of answers, with 96 responses. Respondents clearly saw the amount of development proposed for the rural towns as a major point of contention.

The remaining questions drew fewer responses: 39 people answered Question 7; 35 for Question 8; 37 for Question 9; 57 for Question 10; 41 for Question 12; 38 for Question 13 and 40 for Question 15. All questions related to the Preferred Options as opposed to PPDs, which were broader in defining the strategy than the chapters following it, where there is focus on specific policy areas.

II. Key Areas of Comment

1. Nature of Responses

Literal responses received on the chapter were broad comments on growth giving background and context to this part of the policy. Answers to the questions posed were more varied in that some respondents fully described the contention, backing up their response with examples, and others simply replied whether they were for or against.

2. Main Issues Raised by Objectors to the Chapter

Four of the five respondents on the chapter lent support and one objected. However, the one objector put forward a strong view that ‘allocations for development sites should not be based on the core strategy spatial principle.’

3. Main Issues Raised by Supporters of the Chapter

Supporters offered suggestions on further improvement to Determining Our Growth, in that it should be more informed by the SEP, guidance provided at the Sub-Regional and Regional levels, the MK Growth Strategy and the Issues and Options Discussion Paper. In addition, joint-working with neighbouring authorities was supported.

III. Questions

Question 7

a. Responses on the Core Strategy period to 2026

Of the 39 responses to the question ‘are the reasons for setting the end of the Core Strategy period at 2026 right?’ there were 27 people in favour (69.2% of responses for this question) and 12 in opposition (30.8%). For both supporters and opponents of the determination of the strategy length, the most prominent sub-themes were Milton Keynes Growth Potential and Regional Policy.

b. Support

It was widely acknowledged that the same timescale as used for the SEP is appropriate, i.e. 2026 being the ‘sensible’ and ‘logical’ timescale. However, certain respondents only gave their support of the time span with the caveat that it is periodically reviewed and allowed flexibility. Seven supporters (17.9%) of
respondents to Question 7) acknowledged the need to go beyond 2026, despite thinking 15 years was ‘sufficient’.

c. Objection

While the supporters gave indication that the period could be extended, objectors took this as grounds to reject the way that 2026 had been selected. 15.4% of the respondents on this question stated that it the strategy must go to 2031 for housing and infrastructure. It was noted that national and regional guidance already allowed for planning to extend this far: ‘given the likelihood of continued future growth and sustainable expansion of Milton Keynes beyond 2026, and within the context of the sound principles and directions for growth established by the MK2031 Growth Strategy, it will be important for the Core Strategy to provide a clear and robust foundation for future growth beyond 2026 and even beyond 2031.’ Conversely, on the basis of better monitoring, the period 2026 was deemed too long, because circumstances may change and adaptations could be required.

Question 8

a. Responses on the viability of Strategic Reserve Areas

Out of 35 respondents to this question, 22 considered Strategic Reserves, if needed, to be a good way of identifying potential development sites, representing 62.9% of all responses for Question 8. However, this question was answered by the fewest people in comparison to the other questions in Determining Our Growth. People were far more interested in the location of the urban extension areas, as shown by the feedback on Question 11, than the basis for deciding how development should be determined post-2026. The strength of support on this question could indicate that it was not a controversial matter; indeed, the language of the opinions given below in Support and Objection underline that the matter is not particularly contentious.

b. Support

Supporters agreed with the overall policy content and the evidence base, these being the two prominent sub-themes to come out of the analysis. It was deemed ‘appropriate’, ‘helpful’ and even ‘essential’ to identify areas and directions for future development beyond the time limit of the strategy to 2026.

c. Objection

One party strongly disagreed with the identification of growth areas at this stage, and many more mildly disagreed. Reasons for objecting included the fact that setting aside land for future development could restrict its shorter-term use, that there are unforeseen needs in the period to 2026 and at this time the infrastructure and transport situation could look very different, and that developers could pre-empt development in those locations. Two respondents used this question as an opportunity to object to the locations of growth, although this is fully addressed in later questions. They stated that they agreed to the principle of Strategic Growth Areas, but contented the actual potential sites as shown on the Key Diagram and policy directions.

Question 9

a. Responses on the document’s clarity on change

There were 37 responses to the question asking whether the document provided clarity on where change would happen and how it would occur in Milton Keynes. Five of these (13.5%) expressed the requirement for more information to be provided, which represents a significant proportion in comparison to other questions where the response ‘More Information’ was recorded. Beyond this, 21 participants (56.8%) opposed the claim that the document provided a clear picture of where and how change would occur, and 11 people (29.7%) supported it. Once again, this question did not draw a great deal of responses compared to other questions in Chapter 4.
b. **Support**

Supporters predominantly favoured developing to the south-east and south-west. For each of the sub-themes Develop to South-East and Develop to South-West gained two specific comments (5.4% of overall responses for this question) regarding these directions, whereas developing northwards and centrally had no mention. The fact that respondents referred to the location in their answers, rather than the quality of the document as the question asks, infers that respondents’ priorities are more directed towards the concern of where growth will lead, rather than how it is described. It should be recognised that those addressing the question lent broad support and offered little in the way of improvement. There were two references to the necessity for the policy to be deliverable, consistent and adequately manage change.

c. **Objection**

The picture of where and how change will take place is too general, according to objectors, and there is an ‘absence of specific information’.

Some of the comments focused on a lack of specificity on where growth would occur: ‘clearer guidance on locations for growth’ should be provided, since the document only ‘hinted’ at where growth would be concentrated. An individual found the Strategic Reserves to be under-utilised in the strategy, stating that these ought to be set out in the CS-PO. In addition, a landowner or developer singled out cross-boundary collaboration as a preventative factor, in that the strategy was unable to categorically state what would occur in the locations that fell under the jurisdiction of neighbouring authorities. Two objections outlined that it would be useful to develop the urban fringes, such as Bletchley and Stony Stratford. Another cited the sustainability of a site at Newport Pagnell as appropriate for development.

Other responses found that there was clarity on where growth would occur, but the matter of how it would take place was more pressing. One response mentioned that a table of key dates would be useful to further clarify how development would move forward. The main issue was that there should be more detail, especially around housing numbers and development in the south-west direction.

Once more, respondents felt it necessary to voice location concerns at this stage, and proposed suitable development areas, i.e. they stipulated the detail they believed necessary for ‘where change will happen’ suggesting that they did not think there was clarity around this as the strategy currently stands.

Finally, eight respondents (21.6%) found the wording to be problematic. In particular, the terminology ‘supporting urban renaissance’ was criticised twice for being too emotive and ‘overblown’. It was suggested that such language should be avoided and replaced with more descriptive terminology.

**Question 10**

a. **Responses on striking the right balance of growth**

Responses for the question ‘Has the right balance been struck between growth within existing areas and in extensions to existing areas?’ numbered 57, of which 42 (73.7%) were objecting and 14 (24.6%) were supporting. One person requested more detail before drawing a conclusion.

b. **Support**

Supporters welcomed the ‘considerable consultation and debate’ that has gone on around the balance of growth and found this to be a good basis for the Council’s decision. A respondent wished to highlight the need to avoid a two-speed economy. Other supporters wished the consultation to take into consideration flexibility to attract businesses, feedback from existing communities, the inclusion of an appropriate level of infrastructure, the inclusion of the East-West Rail Project and revision of housing targets in determining the directions of growth.

One supporting respondent stated that ‘growth to the East of the M1 does not represent an appropriate or sustainable option in accordance with the findings of the draft SE Plan Panel Report’, while supporting the other elements included in the considerations of balanced development.
c. Objection

Objectors identified oversights in the direction in which Milton Keynes should grow; specifically, a site at Woodley’s Farm drew several references (five responses, 8.8% for this question) all from private individuals. Northern expansion was also supported with regard to Linford Lakes and Newport Pagnell. As well as objection to distribution, six responses (10.5%) indicated discontent with the quantity of housing believing it is too high. The quantity of housing caused much debate, in fact, since two participants found the quantity too low and several comments alluded to the idea that the overall quantity was correct but the proportions were not right in respect of the locations. To this end, many respondents, mainly landowners and developers, proposed their own strategies, numbers and distributions for housing; these were all different and respondents’ specific calculations for housing quantities and distribution do not show general trends in opinion.

Question 11

a. Responses on the broad areas for the urban extensions

There were 130 replies to Question 11: ‘Are the broad areas identified for the urban extensions right?’ This is the highest number of respondents for any of the 17 questions. As well as attracting the greatest response, it had a low level of support. 68.5% of responses (89 comments) denied that the broad areas for the urban extensions were correctly identified; 30% agreed with them and 1.5% were neither in favour nor against the Council’s identification.

b. Support

23% of supporters were private individuals, 56.4% were landowners and 5.1% were voluntary organisations, 7.7% were executive agencies and 7.7% were local, regional or national government bodies. Particular sites were recommended in line with the broad areas for the urban expansion. These received repeated comments from developers and individuals. Among those mentioned were land to south-east of the Bedford-Bletchley railway, Linford Lakes and additional expansion areas towards Stony Stratford, east of the M1 and towards Woburn Sands.

Six comments (15.4%) praised the extensive background work of the SEP in forming the basis for the decision on the urban expansion. Two respondents noted that the SEP Panel Report favoured the expansion to the south-east and south-west of Milton Keynes. In addition, the strategy appears to be in line with national planning policy, according to those in favour, although on a more local basis, conflict was identified with the strategic planning of Mid-Bedfordshire District Council (MBDC).

Three comments (7.7% of supporters) referred to the distribution of housing quantities, suggesting how this could be better apportioned.

c. Objection

Many opponents to this area of the strategy identified omissions in the areas selected for urban extension. The East-West Rail Link and Woburn Sands flyover were frequently viewed as serious omissions.

Further objections came from not having robust evidence. One parish council found infrastructure funding to be a point that required further investigation. Further to this, Wycombe District Council contradicted the comments of those who found that the strategy was in line with the SEP, stating ‘there is currently a shortfall in provision against both the South East Plan requirements and those recommended by the Panel, which will need to be addressed.’ This was backed up by four other respondents (4.5% of objectors and 3% of respondents to the Question 11).

Wycombe District Council also recognised the need for Milton Keynes ‘to consider the impacts of growth on the transport networks beyond its boundaries’.

d. Key themes

Given that 78.7% of opponents were private individuals and that wording was similar, if not identical, within the responses with regard to the suggested inclusion of Woodley’s Farm in the urban extensions,
the data could be said to have been affected. A more suitable means of identifying concerns would be to observe the key themes that came up in the question as a whole.

<table>
<thead>
<tr>
<th>Key theme</th>
<th>Responses</th>
<th>Percentage of all responses referring to theme</th>
</tr>
</thead>
<tbody>
<tr>
<td>Development Location/Direction</td>
<td>117</td>
<td>90%</td>
</tr>
<tr>
<td>Housing</td>
<td>19</td>
<td>14.6%</td>
</tr>
<tr>
<td>Infrastructure</td>
<td>5</td>
<td>3.8%</td>
</tr>
<tr>
<td>Transport</td>
<td>63</td>
<td>48.5%</td>
</tr>
<tr>
<td>Environment</td>
<td>13</td>
<td>10%</td>
</tr>
<tr>
<td>Social Cohesion and Community</td>
<td>0</td>
<td>0%</td>
</tr>
<tr>
<td>Economic Development</td>
<td>12</td>
<td>9.2%</td>
</tr>
<tr>
<td>Consultation</td>
<td>9</td>
<td>6.9%</td>
</tr>
<tr>
<td>Other</td>
<td>9</td>
<td>6.9%</td>
</tr>
</tbody>
</table>

If the references to the Development Location and Direction are disregarded as they formed the basis of the chapter, as well as the numerous comments submitted about the East-West Railway, the secondary concerns and reasoning for answering Question 11 can be discussed. 14.6% of people commented on the key theme Housing and 10% on Environment. Within these the following sub-themes were the focus of comments:
Question 12

a. Responses on the delivery approach

41 people answered the question ‘is the delivery approach correct for the large numbers of dwellings required?’ and by and large drew objection, 58.5% of respondents (24 people) having disagreed that the approach was suitable.

15 responses supported the delivery as outlined by MKC in the strategy, a proportion of 36.6%. One respondent required more information, and another did not favour or dislike the delivery approach.

b. Support

The Development Plan Documents (DPDs) and Area Action Plans (AAPs) were considered essential for ensuring the delivery by providing detail. These documents need to be ‘unambiguous’, ‘clear’ and ‘in conformity with the Core Strategy’, according to supporters; AAPs are also required to start immediately and should be made a priority.

It was also noted on three occasions (in 7.3% of all responses on Question 12) that joint-working with Aylesbury Vale District Council (AVDC) would be necessary.

c. Objection

No firm themes came out of the objections, and responses were wide-ranging in the problems they addressed. Reflected in the answers, however, was the notion that the housing numbers were unachievable based on historic performance on housing delivery. One developer warned that the delivery approach could fail because it was ‘stacked towards the latter end of the plan period’. This respondent advised that ‘front-loading’ housing provision towards the beginning of the period would be beneficial. Indeed, several parties noted that since the approach was ‘cumbersome’ it was unlikely to deliver on time; seven respondents (17.1%) noted that housing delivery would take too long.
Somewhat in agreement with one of the supporters, one objecting response regarded the relationship with MBDC and AVDC as concerning, given the lack of precedence. Another area of concern was affordability and community coalescence; three people (7.3%) mentioned that care should be taken to ensure that development and housing provision was not disproportionately distributed.

**Question 13**

*a. Responses on the risks and solutions for housing delivery*

38 people chose to answer Question 13 on whether the risks to the delivery of housing and solutions identified to overcome them had been correctly identified. Opposition came from 60.5% of these respondents, 23.7% supported the document in its identification of risks and solutions, 13.2% did not hold an outright view, and 2.6% (one participant) needed further information to form an opinion. Three respondents not offering support or objection stated that their responses to other questions had adequately covered this question.

*b. Support*

While acknowledging that the risks were ‘real’, three responses (7.9%) expressed the opinion that the south-east and south-west Strategic Growth Areas should commence simultaneously, otherwise ‘the south-east growth area 2016-2021 and south-west growth area 2021-2026 are not achieving growth “at the same time.”’ Overall, the risks were more definitely supported than the solutions.

*c. Objection*

This idea was reiterated by objecting parties: ‘while the risks to delivery of housing have been identified the solutions are not robust enough to ensure that the targets are met.’ Some ‘serious flaws’ were identified in the responses: in the strategy there are ‘no firm solutions as to how MKC anticipates ensuring that ... housing completions rate will conform’; ‘potential delays in delivering the urban extensions within adjoining authorities has been understated’; the completion rates and quantities are too ambitious and unsubstantiated; phasing and delivery of transport and infrastructure are key concerns; cross-boundary working should not be relied upon. The main sub-themes to come out were Delivery under key theme Housing, Develop to North in Direction of Growth, along with Evidence in other. Nine respondents referred to Delivery (23.7%), five people made mention of Evidence (13.2% of responses) and four brought in Develop to North (10.5%).

**Question 14**

*a. Responses on the amount of development in rural towns*

Question 14 asked ‘is the amount of development proposed for the rural towns correct?’ 96 people responded. This question received the lowest level of support of all questions. However, similarly to Question 11, the majority of respondents (54.2%) were private individuals. Many of these had local concerns and made similarly-worded comments about preferred locations.

*b. Support*

Much support was highly site-specific and respondents gave the view that certain sites would fulfil the criteria set out by MKC. Several respondents noted the rates of housing growth in the rural area, and agreed that they were acceptable and appropriate. While accepting that some rural development was necessary, the replies welcomed shortfalls of housing in the urban areas not being compensated by rural development. One respondent emphasised the need to prevent developers exceeding local plan densities. A further response related found it desirable that rural areas did not lose their character through densities that were too high.
c. Objection

Aside from the site-specific opinions, two respondents judged Newport Pagnell as suitable for classification under the urban area, rather than describing it as rural. The description of places as rural also came up in other contexts. On evidence, the method of calculating rural housing provision was thought to be ‘historical’ rather than based on an assessment of housing needs. Three respondents (4.3% of objectors and 3.1% of the total number of responses for Question 14) found this to be a flaw in the amount of rural town development. A further 10 people agreed that the quantity of housing was too low.

d. Key themes

As with Question 11, respondents with the same interests duplicated answers. The table below shows the themes that came through strongly. Though this includes the repetition of responses, secondary themes can be viewed, which gives a more realistic picture of the issues that affect this part of the strategy.

<table>
<thead>
<tr>
<th>Key theme</th>
<th>Responses</th>
<th>Percentage of all responses referring to theme</th>
</tr>
</thead>
<tbody>
<tr>
<td>Development Location/Direction</td>
<td>52</td>
<td>54.2%</td>
</tr>
<tr>
<td>Housing</td>
<td>24</td>
<td>25%</td>
</tr>
<tr>
<td>Infrastructure</td>
<td>16</td>
<td>16.7%</td>
</tr>
<tr>
<td>Transport</td>
<td>25</td>
<td>26%</td>
</tr>
<tr>
<td>Environment</td>
<td>9</td>
<td>9.4%</td>
</tr>
<tr>
<td>Social Cohesion and Community</td>
<td>0</td>
<td>0%</td>
</tr>
<tr>
<td>Economic Development</td>
<td>12</td>
<td>12.5%</td>
</tr>
<tr>
<td>Consultation</td>
<td>0</td>
<td>0%</td>
</tr>
<tr>
<td>Other</td>
<td>41</td>
<td>42.7%</td>
</tr>
</tbody>
</table>

As before, directions and locations of the growth in Milton Keynes was a large topic and the focus of many answers. 54.2% of all responses mentioned this key theme. However, Other (42.7%), Housing (25%) and Transport (26%) were also significant and the sub-themes have been drawn out below so that conclusions can be drawn about where the emphasis lies outside of site-specific debates:
Question 15

a. Responses on the Strategic Reserve Area locations

There were 40 responses to ‘are these the correct locations for the Strategic Reserve areas?’, 62.5% objecting, 37.5% supporting.

b. Support

There were seven indications of support for the Strategic Reserve Area towards the south-west. Reasons given were the position of Newton Longville relative to the proposed East-West Railway, the number of houses already planned in this direction and planned roads.
The East-West Rail Project came through as a strong sub-theme in relation to the south-west Strategic Reserve. Proposals for third options of Strategic Growth Areas were also put forward by supporters to bolster the existing strategy on direction of development post-2026. These included Newton Longville, the case for which was built by four supporters (10% of respondents), and around the urban expansion in Milton Keynes, given the development anticipated around Bletchley.

c. Objection
The feasibility of a Strategic Reserve Area towards Newton Longville was rejected by five respondents (12.5%) on the grounds of inadequate existing infrastructure. This location was the most strongly contended of all places that were specifically named. Those in disagreement that the locations were correct frequently pinpointed the area east of the M1 as suitable for development and requested its inclusion as a Strategic Reserve for future development. This explains how the category Other under the key theme Direction and Location of Growth was the highest sub-theme to arise. A total of nine respondents (22.5%) referred to this direction as preferable. Two comments (5%) were received for development westwards, and two suggestions of increasing the Strategic Reserve to the south-west were recorded.

Chapter 5: Managing Our Impacts

I. Overview
With 151 literal responses, Managing Our Impacts (MI) received the second highest proportion of responses (9.9%), 126 of which related to the PPDs contained therein (8.3%). The five comments referring to the whole of Chapter 5 all raised objections to the chapter, which dealt with the environmental issues of zero-carbon, water, waste, transport and healthy lifestyles. Overall, objection was 41% for all elements of commentary provided on this chapter and 59% supported.

II. Key Areas of Comment

1. Nature of Responses
For the most part, responses made additional suggestions to the content of this part of the strategic direction. Respondents chose to focus narrowly on examples and ideas of how to improve the way in which MKC proposed to manage impacts outlined in the CS-PO.

2. Main Issues Raised by Objectors to the Chapter
Complaints on the whole chapter stated that this part of the strategy was insufficient, unachievable and disjointed with regard to the sub-theme Sustainable Development. The British Wind Energy Association’s (BWEA) assertion that ‘generic phrases ... lack the detail and commitment necessary to ensure that such aspirations are achieved’ backs up the ideas of the Milton Keynes Forum that the PPDs should be ‘more closely related, or even fully integrated’.

3. Main Issues Raised by Supporters of the Chapter
There were no positive comments from those choosing to makes statements on the chapter as a whole.

4. Responses for MI Delivery Strategies, Risks, and Targets and Indicators
The predominant themes coming out of the responses on selected sections of the chapter were Transport and Environment. One response supported MI 1 Delivery Strategy, stating that locating mixed-use
development in urban areas ‘would minimise the impact of development on rural areas and support the existing public transport network’. One response objected to MI 1 Targets and Indicators, noting there are not enough. MI 2 Delivery Strategy received one reply in favour. Three responses raised objections to MI 3’s Delivery Strategy, Risks, and Targets and Indicators and one person supported it. The objectors all questioned the basis and achievability of the 100% target for renewable energy post-2014. There were no direct comments on MI 4 or MI 5 Delivery Strategy, Risks, or Targets and Indicators. On MI 6 Delivery Strategy, there was one offer of support. Of the 10 comments on MI 7 Delivery Strategy, Risks, and Targets and Indicators, four supported and six objected, diminishing reliance on the car being the main point of contention: ‘There has never been any intention that the car will not remain the primary transport mode’ and ‘It denies the key importance of the design of the city with grid roads and roundabouts, which make it a city renowned in urban studies for its ease of vehicular connection, supported by the Redways. Rather than taking this as the base premise, we should instead realise the reality that the car will not go away.’ Finally, with regard to MI 8 Delivery Strategy, two people supported promoting a healthy environment and appreciated the linkage ‘between a sense of community and well being’.

5. Responses for Preferred Policy Directions

a. Overall weighting

The following chart shows the objection versus support of all Managing Our Impacts PPDs:

![Chart showing objection versus support for all Managing Our Impacts PPDs]

b. MI 1 responses

There was very strong support for the PPD MI 1, with 19:1 in favour of the promotion of sustainable lifestyles. Sub-themes arising were Quality of Life under Social Cohesion, Public Transport in Transport, Sustainable Development in the Environment key theme category and Other in Housing, which frequently related to mixed-use housing and its benefits.

c. MI 2 responses

For PPD MI 2, there was a slightly higher number of objections (14) than supporting remarks (10). The 24 responses tackled a broad spectrum of themes, although Sustainable Development emerged as the major focus, as 15 respondents referred to energy and the ability to achieve the targets for creating zero-carbon housing. Evidently, Housing was also a key theme that was brought up, with the sub-themes Delivery and Design being primary concerns.

d. MI 3 responses

Respondents were evenly split on PPD MI 3: 10 supported and 10 raised objections. Criticisms of this area of policy largely indicated that targets for renewable energy provision are not in line with national policy
and ‘should be amended to make it consistent with stated national policy that all new homes should achieve zero-carbon status by 2016’.

e. MI 4 responses

Nine literal responses on PPD MI 4 were registered; six objected and three gave support. Four of the objecting parties were landowners or developers. One of the objectors believed ‘suitable mitigation could be implemented to prevent the risk of flooding’ which contradicts the policy of development areas being located away from flood risk.

f. MI 5 responses

PPD MI 5 had seven responses in support and five objecting. A prominent sub-theme was Evidence and the basis upon which the policy has been elaborated.

g. MI 6 responses

The PPD for MI 6 received nine responses; six responses supported this PPD in the way that mineral reserves should be managed. Biodiversity was the leading Environment sub-theme for supporters, with many echoing the sentiments of the Bucks, Berks and Oxon Wildlife Trust that they are ‘pleased to see that the restoration, in line with the priority habitats identified in the Bucks and Milton Keynes Biodiversity Action Plan (BAP), is identified within the Preferred Options.’

h. MI 7 responses

In MI 7, 69.5% of the 23 responses lent support to the stated PPD, which was on managing movement patterns; seven responses (30.5%) were against. The sub-themes that were most frequently commented upon were Public Transport in Transport and Pedestrian Routes and Redway under Infrastructure. Supporters encouraged ‘high-quality public transport opportunities’ and situating high-density housing near to such a network. Those objecting doubted the adequacy of the public transport strategy and also felt ‘the two most sustainable forms of transport, walking and cycling, are not adequately addressed.’

i. MI 8 responses

The final PPD in Chapter 5, MI 8, support outweighed objection by 8:1. Walking and cycling were again particularly noted in the comments, as was the PPD’s reference to open space provision; these were broadly welcomed. The only objection was a matter of inaccuracy in the formatting of the section.

Chapter 6: Managing Our Assets

I. Overview

There were 27 literal responses on the MOA Delivery Strategies, Risks, and Targets and Indicators for the chapter on Managing Our Assets (MOA) and 90 comments on the PPDs. No responses were submitted for the chapter as a whole. Overall, there were 78 supportive statements (66.7% of the 117 literal responses to this section), 11 within the Delivery Strategies, Risks, and Targets and Indicators and 67 on the PPDs.

II. Key Areas of Comment

I. Nature of Responses

Unlike Chapter 5, on the whole, respondents addressed the broad principle of the section Managing Our Assets, as opposed to adding detail on how they thought the strategy could be improved. A few responses did suggest additional points for the policy, but none were as extensive as the responses given for Managing Our Impacts. Combined with the high level of support and the lower number of responses, this
suggests that the content of the chapter is less controversial and more easily accepted than the environment and transport issues that came to the fore in the previous chapter.

2. Responses for MOA Delivery Strategies, Risks, and Targets and Indicators

Biodiversity, Green Infrastructure, and Heritage and Character were the major sub-themes to come out of the comments on the Delivery Strategies, Risks, and Targets and Indicators for the PPDs in this section. There were 14 references to Biodiversity, 10 to Green Infrastructure and Open Spaces, and 4 to Heritage and Character.

Two responses objected to the Delivery Strategy for MOA 1, one objected to the Risks and one to the Targets and Indicators; these stated that the focus was wrong. The four objecting responses came from two parties. There was one response giving support to the MOA 1 Delivery Strategy.

Four literal responses opposed MOA 2 Delivery Strategy; objections were broad and ranged from not increasing linear park space to including extra elements in developing standards for the provision of open space, such as rights of way, biodiversity and land use assessment. One supportive remark was registered for MOA 2 Delivery Strategy. On MOA 2 Targets and Indicators, two responses were favourable and one was negative.

On MOA 3, one literal response of support was noted for each of Delivery Strategy, and Targets and Indicators; there were no objections to the Delivery Strategy, Risks, or Targets and Indicators.

Finally, support to objection on the MOA 4 Delivery Strategy was 3:1 in terms of numbers of literal responses, 0:2 for Risks, and 2:3 for the Targets and Indicators. The voluntary sector contributed the majority of favourable answers, with seven responses, for instance, ‘we are very pleased to see the Council’s commitment to the development of biodiversity guidance notes’, ‘we are strongly supportive of the approach to joint-working’ and ‘[we] greatly welcome the Council’s approach to working with the Partnership in the Biodiversity Opportunity Areas and in the proposal for Biodiversity guidance notes that could be developed.’

The below chart summarises this support and objection:

![Chart summarising support and objection]

3. Responses for Preferred Policy Directions

a. Overall weighting

*Managing Our Impacts* gained a high level of support on all four PPDs as shown on the graph below:
b.  **MOA 1 responses**

On the PPD for MOA 1, 21 literal responses were received. 14 of the comments were in favour and seven objected. It was observed by two objectors that the character of the new town had been overlooked and that this in itself was part of the character of the area: ‘It is clear that local people value the layout and design of the original city, and wish to see key elements retained.’ On the positive side, responses broadly agreed that little needed to be added; English Heritage ‘welcomed the prospect of long term protection to those historic environment features’ and the ‘reference to the rich heritage in paragraph 6.1.2 and the contribution towards local distinctiveness and character.’ Additional information that supporters requested included reference to archaeology, biodiversity interest at historic sites and taking existing land use designations into consideration.

c.  **MOA 2 responses**

PPD MOA 2 drew 41 comments, 65.8% of which were supportive of enhancing green infrastructure and open space. Comments referred to the sub-theme Green Infrastructure primarily and many of the categories within key theme Environment. Specifically, extensions to the linear parks, green buffers between the urban area of Milton Keynes and rural settlements such as Aspley Guise, Woburn Sands and Newton Longville, and ‘Blue Infrastructure’ came out in supporters’ comments. Two objectors thought that there was no need for the linear park to extend to Bow Brickhill. Further, some replies indicated that a green buffer around Aspley Guise was insufficient and that only green belt would be an adequate means of preserving the nature of the rural settlement.

d.  **MOA 3 responses**

All 14 respondents for PPD MOA 3 agreed with the policy direction. Half of the responses came from landowners and developers, three were from the voluntary sector category, three came from local, regional or national government and one came from an executive agency.

e.  **MOA 4 responses**

The fourth policy direction in this section, MOA 4, also received 14 replies, weighted 12:2 for support to objection. The two objectors both found the policy to be ‘too thin’ and recommended substantial additions to make the policy more robust by emphasising quality. Green Infrastructure and Biodiversity were the major sub-themes in this section, and the major basis for support.
Chapter 7:
Supporting the City’s Economy and Sub-Regional Role

I. Overview

This chapter, Supporting the City’s Economy and Sub-Regional Role (ESRR), drew the fewest responses of all the sections in the document containing policy directions, Chapters 4-9. There were 98 responses in all, 58% objecting and 42% supporting; 57 comments viewed the section negatively. On the general chapter comments, eight people sent remarks; six of these were largely in agreement with the economic strategy and the fact that ‘the continued growth of the city should be employment-led’. On the Delivery Strategies, Risks, and Targets and Indicators, 18 responses were registered and there were 72 references to the PPDs.

II. Key Areas of Comment

1. Nature of Responses

In general, responses questioned the soundness of the data upon which the policy was based and provided lengthy commentary around the Economic Development key theme, notably the sub-themes Employment, Job Creation and Business Involvement.

2. Main Issues Raised by Objectors to the Chapter

There were two such responses raising concerns over the Supporting the City’s Economy and Sub-Regional Role section. These queried its soundness on the basis of the key themes Employment and Housing Delivery: what is the source of the statement that jobs have continued to grow at around 3,000 a year; will the CS-PO amend the boundaries for the city centre in terms of retail use; why is there no mention of residential development in central Milton Keynes or the creation of mixed-use neighbourhoods?

3. Main Issues Raised by Supporters of the Chapter

The six supporters of the chapter highlighted the need for tying housing growth to job growth. The sub-regional role within the section was also welcomed, but it was stressed that Milton Keynes’ status in the region should be included in existing policy documents such as the MKSM SRS and SEP. There was suggestion made that employment should be monitored in an MK Employment Survey.

4. Responses for ESRR Delivery, Risks, and Targets and Indicators

For ESRR 1, there were three objections to the Delivery and two supportive comments. The objectors to the Delivery believed that the spatial strategy should not form the basis of new employment sites. Three responses also objected to the identified Risks. On the Targets and Indicators for ESRR 1, there were two responses supporting and one objecting: high technology and R&D jobs were suggested as an additional target by a supporter. This was backed up by the objection, in that ‘measuring service jobs does not seem an accurate test of the knowledge-based economy’, which was stated in the CS-PO as an aim of MKC. One response supported ESRR 2 Delivery and one supported ESRR 2 Risks. There were no comments on the Deliver, Risks, or Targets and Indicators for ESRR 3. There was one objection to each of Delivery, and Targets and Indicators for ESRR 4, and one supportive comment for Risks for the same PPD. A measurable for cultural strategy would be difficult to identify in the Targets and Indicators section, it was twice noted. On ESRR 5 Delivery, two objections were observed, both from service providers.
5. Responses for Preferred Policy Directions

a. Overall weighting

Below is the spread of the 72 responses received on the policy directions ESRR 1-5, showing the amount of support compared with objection:

- **ESRR 1 responses**
  
  The first PPD received the highest number of responses and the number of objections slightly outnumbered supportive statements, 13:10. Negative comments included the notion that the policy was insufficient, with an emphasis on skills and making Milton Keynes an attractive place for business to locate: ‘We need to ensure that Milton Keynes is a credible, attractive base for business and home for employees’ and that there are ‘a wide range of skill-level needs in the local economy, to provide employment opportunities at all points on the skills spectrum.’ Further, ‘We need to raise the educational attainment of local schools at least to the national average, if children of existing residents are to have full access to future local job opportunities.’

  In fact, Education, Employment and Job Creation came out as the sub-themes for which respondents had the most concerns. Contrary to MKC’s desire to see increased high-tech employment, creative industries were mentioned several times as a key area to include and develop in the strategy. In addition, there were objections to the language around ‘knowledge-based economy’, which should be more clearly defined.

  The remarks of the supporters related to the location of new employment sites, and the ‘move away from the current warehouse- and logistics-dominated industry’ which was said to ‘create better quality jobs and result in less land taken up per job.’ Another favourable point is the minimised need to travel, if jobs, homes and public transport are aligned.

b. **ESRR 2 responses**

On PPD ESRR 2, 12 respondents (80%) objected and only three responses (20%) agreed with the new Central Milton Keynes University, a Milton Keynes Technopole and establishing long-term needs of other higher education establishments. Criticisms included the basis for having a new university, its location and its relationship with institutes such as The Open University, Cranfield University and Luton University. In addition, the sub-theme Wording came out strongly, as several people had contentions with the terminology ‘Technopole’, which is neither widely understood nor adequately described.

c. **ESRR 3 responses**

PPD ESRR 3 received five responses, 3:2 in terms of objection to support. Objectors found the creative industries to be poorly understood and explained some considerations need to be taken into account.
e. **ESRR 4 responses**

There were 19 literal responses for PPD ESRR 4. Support to objection was 10:9. Supporters of this PPD came from a range of respondent groups and the themes that came out in the answers were vast, although there was much support for balancing cultural activity across the whole area, rather than the emphasis on the ‘major cultural facilities that already exist within Central Milton Keynes’ as detailed in the PPD. While agreeing with the policy direction in principle, some supporters warned that diversity of retail provision is necessary.

f. **ESRR 5 responses**

The final PPD to be covered in this section attracted 10 responses, 70% being against the sporting facility policy on the grounds that sport is important but not a major Council priority. It was considered that ‘the aspiration to achieve new sporting facilities of national significance is worthwhile’ but culture should take precedence. Four parties indicated that careful design was necessary, with Leisure and Spatial Planning coming out strongly as important sub-themes in the Infrastructure category.

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**Chapter 8:**

**Serving Existing Communities**

I. **Overview**

On *Serving Existing Communities (SEC)*, 112 responses were submitted: two on the chapter generally; 20 on the Delivery, Risks, and Targets and Indicators; 90 on the PPDs SEC 1-6. 71 responses (64% of responses to this chapter) supported this part of the strategy; 41 objections (36%) were registered.

II. **Key Areas of Comment**

1. **Nature of Responses**

Answers on Chapter 8 were often highly specific, incorporating narrow points and detailed examples. This was not true of the 20 responses referring to the Delivery, Risks, and Targets and Indicators, which more loosely talked about the principles in the policy directions.

2. **Main Issues Raised by Objectors to the Chapter**

There was only one comment objecting to the content of this chapter. The respondent said that the document appeared ‘rushed’ and without ‘the same depth of appreciation of the issues and risks as found in other chapters’.

3. **Main Issues Raised by Supporters of the Chapter**

There was one single comment supporting Chapter 8, in which the respondent called it ‘relevant’, particularly to a one-speed approach.

4. **Responses for SEC Delivery, Risks, and Targets and Indicators**

For SEC 1 Delivery, received three supportive comments and one request for more information. For SEC 2 Targets and Indicators, there was one supportive comment, which identified the need for a good level of detail and then planning processes to guide developers in a way that benefits Milton Keynes. SEC 3 received one objection and one supportive remark in the Delivery, Risks, and Targets and Indicators sections. Of particular interest to respondents, the lack of reference to community engagement was missing from Delivery, according to the objecting respondent on Delivery. Furthermore, for SEC 3 Targets
and Indicators, the objector noted that the points were relevant to new build but not regeneration of what exists. Four parties supported SEC 4 Delivery: ‘spatial planning has a key role in providing and creating safe and sustainable environments.’ For Risks on SEC 5, there were two further supportive responses. It was agreed that growth should be monitored and balanced. On the Delivery of the sixth PPD, SEC 6, there were two respondents giving support and one objecting. The response that objected warned that care should be taken about ‘assuming faiths and ethnicity are one and the same’. The two service providers supporting the Delivery of SEC 6 stated the importance of ‘effective engagement in the early planning stages’.

5. Responses for Preferred Policy Directions

a. Overall weighting

The PPDs of Serving Existing Communities were welcomed or rejected by respondents thus:

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<th>Policy Direction</th>
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<th>Object</th>
<th>Support</th>
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</thead>
<tbody>
<tr>
<td>SEC 1</td>
<td>1</td>
<td>9</td>
<td>12</td>
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<tr>
<td>SEC 2</td>
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<td>SEC 6</td>
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The response ‘No Comment’ was received for the first four PPDs from the same respondent, who described the emerging policies as merely ‘generalised statements of intent’ on which it was ‘difficult to comment ... because they are incomplete and their implications cannot be properly assessed.’

b. SEC 1 responses

Where MKC proposed increasing locally access to services in PPD SEC 1, 12 respondents (55%) commented positively, nine objected (41%) and one party submitted the response ‘No Comment’. The Infrastructure key theme featured the most and the sub-themes Education, Retail and Community Facilities came out in several replies. Libraries, creative industries and development of existing services required attention, according to supporters. Those objecting did so for the following reasons: meeting places should be included in the policy; pubs should be omitted; health facility issues, such as dentists, should be addressed; the existing urban area should appear in SEC 1; employment in rural areas needs mention; ‘good access to services is not necessarily about co-location.’

c. SEC 2 responses

For PPD SEC 2, there were 19 responses, 63.2% of which supported the direction (12 responses) and 31.6% of which objected to it (six responses). The key issues communicating through in the literal responses submitted by those who generally supported the PPD were Affordable Housing and Delivery. Supporters had concerns that, while the principle of the PPD was sound, there could be a ‘detrimental effect’ if specified proportions of housing for mixed-use housing were stipulated. Additionally, there was doubt
around whether Houses in Multiple Occupation (HiMOs) could provide sustainability for the communities living therein, unless care was taken in their development and management.

In fact, HiMOs featured in the concerns of objectors to this PPD. They were described as ‘emotive’ and the policy dealing with them ‘ambiguous’. Social rented housing was mentioned by 50% of opponents to this PPD, 15.8% of all respondents to this section; they stated that social renting should be the focus, or at least included in the policy direction.

Finally, one objector was ‘disappointed that the needs of ethnic minority groups have been singled out for special mention’ in contrast to the majority of respondents who generally welcomed the fact that MKC has identified that the ‘policy includes provision for communities with pressing housing needs such as travellers and ethnic minority groups.’

d. SEC 3 responses

14 people chose to submit their views on SEC 3; 50% of these supported the PPD (seven responses), 42.9% objected (six responses). One person submitted an answer but chose not to come down in favour or against the policy direction.

Where objections were raised, people mainly referred to the problems in selecting areas for regeneration. Among concerns was the view that regeneration should come from within the community. In addition, three comments (21.4% for this section) highlighted that the link between physical regeneration and building communities is problematic in that one does not necessarily lead to the other: ‘There is a fundamental confusion between social regeneration and physical regeneration… Such social regeneration requires a largely different approach. Physical regeneration may simply change the character of the area and increase housing costs so that those most in need move.’

Regenerative benefits were noted as ‘key criteria’ in planning considerations by three supporters.

References to heritage-led schemes and community capacity-building were heralded as the means to achieve that regeneration.

e. SEC 4 responses

SEC 4 did not draw many responses, with only 5.5% of the responses for the PPDs in Chapter 8 commenting on it. Five comments were received: one objection (20%), three in support (60%) and one neither for nor against (20%).

Objectors were split on their reasoning. One person commented that the PPD was essential but insufficient; another stated that reducing health inequalities did not merit a separate policy direction if others were made more robust. The final opponent objected on grounds that there were no measurable outcomes.

f. SEC 5 responses

In this PPD, seven respondents (43.7%) found in favour of ensuring balanced growth of the city and nine people were against (56.3%). Sub-themes Monitoring and Strategic Growth Areas, and Wording were notable.

Few supporters elaborated on their indication of support, although one comment pointed out that this is already part of the strategy in the SEP: ‘The spatial strategy for Milton Keynes, as recommended to be modified in line with the South East Plan Panel Report, is therefore one that already takes account of achieving the correct balance of urban sites and the [Strategic] Growth Areas. The key objective for the Core Strategy is therefore to secure delivery of the strategy on a comprehensive basis.’

In opposition, the phasing strategy was felt to be ‘artificial’. More specifically, another objector observed that it is ‘preferable to begin the regeneration work in existing areas’. There was also much concern over the wording of the policy, which was described as a ‘jumble of ideas’ in its current state.

g. SEC 6 responses

On SEC 6, which focused on managing the growth of Milton Keynes, 78.6% of the 14 respondents were in favour of the policy direction. 21.4% (three respondents) objected.
The three objecting participants did not find it appropriate to include the wording ‘including the needs of faith communities’ in the PPD, for various reasons. Some supporters agreed that the community aspect needed to be broader and refer to all the diversity strands. Timing and delivery of infrastructure were two critical focuses of comments. It was deemed possible that delivery should be in line with existing mechanisms. It was suggested that the strategy should also impose ‘discipline on authorities and developers’ to ensure delivery, with forward planning necessary for Green Infrastructure to mature.

**Chapter 9:**
**Growing New Communities**

I. **Overview**

There are three elements to Chapter 9 available for comment; the whole chapter, the Delivery Strategies, Risks, and Targets and Indicators, and the PPDs 1-6. In total, there were 148 comments on this chapter: two were submitted on the chapter, 25 on the Delivery Strategies, Risks, and Targets and Indicators and 121 on the policy directions.

109 responses (73.6%) supported the chapter or part thereof, 25% of respondents objected and 1.4% refused. *Growing New Communities (NC)* therefore saw the highest amount of support out of the Chapters 5-9, which are those containing policy directions.

II. **Key Areas of Comment**

1. **Nature of Responses**

The majority of responses on this section put forward detailed commentary on targeted sections of the chapter, much as they did in Chapter 8. The exactitude of examples led to a vast amount of sub-themes being addressed as respondents referred to their own individual interests.

2. **Main Issues Raised by Objectors to the Chapter**

The only objection on the chapter as a whole was on community development work in new communities, which should be included in the policy according to the respondent, particularly given the focus on community safety.

3. **Main Issues Raised by Supporters of the Chapter**

The one comment that referred to Chapter 9 overall noted the relevance of the strategy in this section and how each of the criteria could be applied to a particular site.

4. **Responses for NC Delivery Strategies, Risks, and Targets and Indicators**

There were no opinions given on any of the Risks or Targets and Indicators sections for NC 2-6 and PPD NC 1 had no Delivery Strategy, Risks or Targets and Indicators associated with it. For Delivery under the second PPD, NC 2, five answers were submitted. Of these, three supported and two objected. The Thames Valley Police and Buckinghamshire Fire and Rescue Service provided similar positive responses stressing the need to engage with service providers. Of the three negative comments received, two referred to Infrastructure and one to Environment. The opposition on environmental grounds was against green buffers to prevent coalescence, which the objector saw as MKC’s approach. One objector indicated that green infrastructure was not a strong enough focus in this part of the strategy. The final objection related to the changing nature of communities and infrastructure and the impact of these on safety.

One person supported the Delivery of NC 3, the emphasis being placed on good quality housing design.
All seven respondents on NC 3 supported the Delivery section, six of which on the basis of housing design so that safety measures, community facilities and infrastructure can be meaningfully incorporated. Two comments referred to the MK Tariff and one made note of the importance of cross-border cooperation in relation to green infrastructure.

On NC 5 Delivery, three of the four comments supported and one objected. Again, safety was the concern of the objector, in that certain service providers had not been recognised in the section. On the positive side, consultation with the appropriate agencies was encouraged. All six of the Delivery responses for PPD NC 6 were in favour. There was recognition for the incorporation of the Police; this was a welcome inclusion.

5. Responses for Preferred Policy Directions

a. Overall weighting

The graph here gives the total number of respondents supporting and objecting to each PPD in Chapter 9:

![Graph showing number of responses]

b. NC 1 responses

28 people provided an answer on the first policy direction, which outlined the key criteria for communities. 21 respondents (75%) supported the criteria, and 7 participants (25%). No sub-theme was prominent and the issues addressed were wide. Many surrounded the subject of infrastructure, but in so many ways that common sub-themes could not be identified. Objectors found the lack of evidence base and clarity in the PPD concerning; this could lead to delivery being impeded. Other factors identified as preventing timely delivery was the potential problems foreseen in cooperation between authorities and the directions of growth being over-reliant on urban extensions. However, there was more support than objection for the criteria. Of these, 10 were landowners or developers indicating the appropriateness if certain sites. The recognition of transport links, good design, and social factors such as improving the quality of life were applauded in certain instances, but the majority of comments did not give a high level of detail or concrete suggestions, reflecting the comments that the section appeared to be a ‘vision’ and had delivery mechanisms were missing.

c. NC 2 responses

There were 24 replies for PPD NC 2, 71% having chosen to comment positively and 29% raising objections to the policy.

Of the supporters, Infrastructure and Other were identified as key themes, with Policy Content being the sub-theme in the Other category being logged the most. Specifically, comments on policy content reflected the appropriate principles.
Balance and sustainability were key issues brought in by the supporters of this policy. One person viewed the ‘demands of the local economy, principally the number of jobs created within the urban area’ as the factor that should lead expansion.

Opponents to NC 2 found that the approach and evidence for deciding that coalescence with existing settlements should be prevented were problems; two replies (8.3%) mentioned the lack of evidence, one of which referred specifically to the fact that ‘work with adjoining authorities to ensure that the future role that existing settlements will have in relation to growing communities is adequately planned for.’ There was further objection to this part of the PPD because it appeared that it was ‘in direct opposition’ with preventing coalescence; this was backed up by the fact that three respondents (12.5%) were in favour of green buffers and preventing coalescence of smaller settlements with the urban part of Milton Keynes but disagreed with this way of doing it. On the other hand, one respondent disagreed that prevention of coalescence was required: ‘There is scope for the existing settlements to be incorporated into the urban area without prejudicing their separate character and community identity.’

d. **NC 3 responses**

20 responses relating to the third PPD were received, of which, 55% supported increasing housing delivery for affordable housing, market homes and housing for minority and ethnic groups. Affordable housing and homes for minorities and ethnic groups were underestimated, it was stated by three objectors; there is a ‘need to offer much more social housing than is currently planned’ one response declared. Delivery was once again a major source of apprehension, as objecting parties found the current strategy to be ‘over-optimistic’.

Further, while the need to provide market homes was acknowledged, tenure and viability should be carefully considered in each location as the desired ‘range may not be suitable on some sites’.

Positive comments welcomed this PPD on the basis that there was ‘a great need to increase the social housing stock in Milton Keynes’ and affordable housing featured highly in supporters’ priorities in this regard.

e. **NC 4 responses**

This PPD, NC 4, gained strong support with 16 out of the 19 respondents (84.2%) agreeing with the proposed direction on creating flexible and supportive living space.

Two people against the PPD rejected the wording, one commenting that the delivery section made ‘reference to a range of services’ which ‘has become a reference to infrastructure’ and also expressing confusion over the fact that ‘the term “a relatively wide range of services” appears to be intended to cover the complete range between a very large and a very small local centre [and] is not clear’. The other objection to wording was that it is inappropriate to include ‘matter of specific detail in the policy wording’.

There was one objection on the basis of high density having a detrimental effect on health and the quality of life.

Key themes coming out of the supporters’ views surrounded Infrastructure and Housing issues. Housing densities being located close to shops, community facilities and services. Few supportive respondents gave more detail, merely stating their support of the broad principles.

f. **NC 5 responses**

Again for this PPD, the vast majority of respondents chose to support balanced growth in the city. 18 of the 20 respondents (90%) supported and only two objected.

Woburn Sands Town Council found the ‘failure to safeguard and expand grid road system’ to be a major omission. The other objector wished for provisions to be applied on a site by site basis. These were individual concerns and support was given more broadly to NC 5.

Four supporters (20% of respondents on this PPD) placed emphasis on costing and funding, while supporting the thrust of the policy direction. It was also highlighted that provision of infrastructure requires commitment from those involved to ensure delivery. On the whole, infrastructure provision to support the growth of Milton Keynes was supported.
g. NC 6 responses

50% of the 10 comments submitted for NC 6 were positive and supported the creation of safer places in the way MKC proposed. Three landowners and two government respondents agreed that this PPD was desirable, emphasising that design was a key issue in the creation of safe places. Objectors gave fuller answers on this PPD, listing the pitfalls in the policy, which mainly related to the key theme Infrastructure. While two service providers considered the policy weak and ‘should robustly state the expectation that all new development will be designed to Secured By Design (SBD) standard for external areas and buildings.’ There was further concern over the ‘erosion of the grid road system’, high density of housing and lessening of green space, which were deemed to be threats to community safety and could increase pollution.

Chapter 10: Implementation, Delivery and Risk

I. Overview

Observations on Implementation, Delivery and Risk were given by 60 people. One person chose to give their view on a specific section of Chapter 10, while 29 commented on Question 16 and 30 on Question 17. In all, there was 56.7% objection (34 responses) and 38.3% in favour (23 responses) of the chapter’s content. Three declined to comment whether they were in favour or opposed.

II. Key Areas of Comment

The sole respondent on the whole chapter accepted the importance of the content of Chapter 10 and had nothing to add.

III. Questions

Question 16

a. Responses on the methods of identifying and delivering infrastructure

As if the suggested ways of identifying and delivering key pieces of infrastructure were a good way to move forward, 15 people (51.7% of respondents) were in support, 13 responses (44.8%) submitted denied that MKC’s identified infrastructure delivery was adequate and one reply stated that there was insufficient information on the criteria for assessing other infrastructure to come down in favour or against.

b. Support

Two parties commented that the Joint Delivery Teams’ (JDT) focus should be the environment, taking into account ‘green infrastructure, carbon, water, waste, landscape and flooding’. In addition, it was declared that the JDTs should not be bureaucratic, which would impede delivery; it was deemed imperative that they were as ‘efficient and effective as possible’. Secondly, the role of the private sector in delivery was noted. Thirdly, several participants acknowledged and accepted the link between the delivery of infrastructure and the Milton Keynes Tariff arrangements.

Overall, supporters agreed broadly with the methods of identifying and delivering infrastructure, particularly if they were coordinated with the authorities AVDC and MBDC, and the SEP and all relevant agencies.

c. Objection

Responses that objected to the methods of delivering infrastructure were varied. The East-West Rail Project was of notable concern, in that the chapter does not properly address the provision of ‘one of the key infrastructure requirements’, rail services provision and the station at Newton Longville.
Opponents stressed that transport infrastructure should take priority over housing provision and should be in place in advance of housing development. In addition, there were further calls for the inclusion of environmental and community elements in delivery.

Finally, the multiplicity of stakeholders and agencies upon which responsibility for delivery rests meant that objectors had ‘serious doubts that any strategy could be successfully implemented’.

**Question 17**

*a. Responses on the schedule*

30 replies were logged for the question ‘are the specific projects identified in the schedule correct?’ 66.6% denied that the schedule identified the correct projects, 26.6% supported the schedule’s content, one respondent (3.3%) needed more information and one declined to comment for or against.

*b. Support*

The provision of rail facilities featured highly among the elements of the schedule that were supported, which reiterates the views in Question 16 that the East-West Rail infrastructure is strongly supported. Roads were a second area of support for inclusion on the schedule, namely: the dualling of the A421 from J13 of the M1; public transport improvements along the A421; Park and Ride extension and M1 junction improvement.

*c. Objection*

Identified as omissions were the following projects: ‘realignement of the A509 between Junction 14 of the M1 and the A422’, associated with the delivery of the growth area towards Newport Pagnell; ‘extension of the East-West Bus Corridor along Grid Road H6 ... and H5’; development at Linford Lakes and New Bradwell. All location-specific comments were raised by landowners or developers. Environmental concerns were highlighted once again, as the road projects identified in the schedule were seen to be encouraging rather than diminishing the use of the car. Further, one respondent felt that green infrastructure should be included in the schedule; another added that the extension of the Redway and linear parks should be included and more prominent.

**Conclusion**

I. **Overview**

A number of themes were raised on more than one chapter of the consultation document. These are summarised as cross-cutting themes. Given that support and objection for the strategy are barely separated, with 49.2% of responses objecting and 48.5% supporting the CS-PO, it is useful to focus on the areas that were repeated in respondents’ answers.

II. **Cross-Cutting Themes**

1. **Housing and Delivery of Housing and Infrastructure**

A number of responses noted that the strategy did not put forward concrete proposals of how development of Milton Keynes would be delivered. While the principles were broadly supported, there were calls for agencies that will be responsible for delivery, including developers and government authorities, to make commitments on delivery.

Timing and phasing of housing delivery in tune with infrastructure was widely regarded as necessary and respondents found it critical to ensure infrastructure was delivered in advance of expansion, or to locate high-density housing where services were already in existence.
The theme of housing was intentionally tied into employment growth in the strategy and this clearly came through in responses; the sub-themes under Economic Development, Employment and Job Creation, were regarded generally as an essential driver of decisions.

Cost and funding was another barrier to delivering housing numbers, which was a significant cross-cutting theme. Tied into this was the acknowledgement that the MK Tariff could play a part in development throughout the lifetime of the strategy to 2026.

The strategy was criticised for not providing enough detail and definition around the basis upon which delivery was determined. Proposed housing numbers featured in many concerns, the quantity being thought of as too ambitious by many. A smaller and yet substantial proportion of parties found MKC’s figures to be unambitious.

In relation to the latter point, there was conflict around the strategy being in line with other consultations, national policy and regional and local plans.

2. Document Clarity and Policy Content

Reference to co-ordinating and joining-up with other policies extended beyond housing provision. This was particularly the case where services, development of infrastructure, transport systems and green infrastructure extended beyond the boundaries of MKC. On the whole, it came across that joint-working was preferred on this cross-boundary issue. Prior to the submission version of the CS-PO being elaborated, the SEP Panel Report must be more stringently considered; this was reiterated in every part of the strategy consultation by respondents familiar with regional policy.

As well as revisiting the strategy in relation to other documents, it was suggested throughout the consultation that more clarity would be welcome. For several chapters language was deemed to not be clear, descriptive, or neutral enough. In addition, the glossary needs to be extended to include further terms and concepts that are not widely understood.

3. Direction of Growth

While the theme Development Direction and Location came through strongly in every aspect of the consultation, and in this respect could be considered a cross-cutting issue, many responses were repeated with the same agenda and arguments and did not always relate specifically to the question being posed. This has affected the analysis in that this theme could be artificially elevated in importance.

Nonetheless, direction of development, balance of growth in the urban area and Strategic Reserve Areas were a priority in many responses, given the nature of the questions

4. Transport

All four sub-themes of Transport (Roads, Congestion, Public transport and the East-West Rail Project) came through across the consultation and could be considered cross-cutting themes. Of particular relevance, public transport, and whether it could bring the desired effects and really result in a modal shift away from car use, was a key issue.

The East-West Rail project drew considerable mention. Those in favour of development that would rely on or be situated near this transport link particularly referred to this theme in substantiating their opinions on the site they supported. Other stakeholders had additional and more specific interest in this theme.

Roads was a theme that drew varied responses, not least the grid road system that exists in the town and the proposed improvements to roads in the vicinity. The theme of congestion, especially around infrastructure changes and development timescales, came through in a number of replies to the consultation as well.

5. Energy and Environment

While the chapter Managing Our Impacts focused on environmental concerns, the topic came out across the consultation. For example, on energy, serious conflict was found in striving for zero-carbon development, energy efficiency and reduced emissions, especially in relation to its achievability and
timescale in Milton Keynes. Targets were not deemed realistic on the whole, while the principle was supported generally. Environmental issues were considered inseparable from quality of life and health issues, and ideas that should be promoted according to respondents included expanding the linear parks, increasing open spaces, planning green infrastructure, and improving and extending pedestrian routes and the Redway to encourage walking and cycling. These themes were repeated in relation to different sections of the strategy document. Environment was also strongly linked in the responses to preserving the character of certain rural areas around central Milton Keynes, in that green buffers to prevent coalescence between the city and the rural settlements should be created and intense development should not compromise the character of the villages and market towns. Character was a theme that came through in this respect, although not always in relation to careful consideration of development in the rural areas; the uniqueness of Milton Keynes, its distinctive grid system and new town status represented major issues for debate and the respondents addressed the preservation of Milton Keynes’ character throughout the consultation.

6. Communities

The final cross-cutting theme was community and the need to engage and consult. Over and above the quality of life and health issues mentioned under the cross-cutting theme environment, in the consultation, respondents referred to communities in that they should determine the demand for infrastructure and requirement for safety. Communities were the primary subject of both Serving Existing Communities and Growing New Communities but the theme came out in all areas of the consultation. Respondents were mainly local to Milton Keynes and hence expressed the importance of the communities in which they were situated and the part that communities should play in determining the city’s growth.
SUMMARY OF THE KEY ISSUES RAISED IN PREFERRED OPTIONS CONSULTATION, AND OFFICER COMMENTS AND RECOMMENDATIONS PUBLISHED ON COUNCIL WEBSITE AND LIMEHOUSE, APRIL 2009

These tables act as a summary of some of the key issues raised in the Core Strategy: Preferred Options consultation, and the Council’s responses to those comments. It is not a comprehensive list of all comments received, or all opinions expressed about particular issues. For a quantitative analysis of the representations, see to the Ubiquus consultation report at [http://cmis.milton-keynes.gov.uk/CmisWebPublic/Binary.ashx?Document=24339](http://cmis.milton-keynes.gov.uk/CmisWebPublic/Binary.ashx?Document=24339).

To see the full list of representations received and officer responses, use our online consultation system, Limehouse ([http://miltonkeynes-consult.limehouse.co.uk/portal/dev_plans/core_strategy/cspo_sept07/cs_po_sept07](http://miltonkeynes-consult.limehouse.co.uk/portal/dev_plans/core_strategy/cspo_sept07/cs_po_sept07)). The officer responses were written over the last 12 months and represent the situation at the time they were written. The consequence of this is that the content of some officer responses may not be superseded; for example where reference is made to a draft document which may now have been adopted. While the officer response in Limehouse may not have been superseded, readers should be assured that the forthcoming Core Strategy: Submission version will reflect the most up to date information.

The Core Strategy: Submission version is currently being finalised in preparation for the Cabinet meeting on 2nd June 2009, prior to a twelve-week consultation period later in the year. Details of that consultation will be published in due course.

A Overall Strategy and Context

<table>
<thead>
<tr>
<th>Summary of issue raised</th>
<th>Officer Response and Outcome (Recommendations in bold)</th>
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<tbody>
<tr>
<td>Vision</td>
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<tr>
<td>− The vision is a good summary of the aspiration for Milton Keynes and incorporates much of the statement contained in the MK 2031 Growth Strategy with some additions.</td>
<td>− Noted</td>
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<tr>
<td>− The draft vision for Milton Keynes Borough is too long and is not sufficiently focussed on the area. The vision should be simplified to focus on two or three key issues rather than seek to encompass a wide range of matters. The underlying aim of the vision should be to express how much change is needed over the period up to 2026 and the outcome of the change. An important part of the vision should be delivering sustainable growth.</td>
<td>− Work on the vision and objectives will be undertaken to make them more locally specific.</td>
</tr>
<tr>
<td>− The grid system is undoubtedly one of Milton Keynes greatest assets, as well as being one of the key components that define the city’s character. It is therefore vital that the vision acknowledges the success of the grid and ensures that growth areas to the south-west and south-east are</td>
<td>- The importance of grid roads to Milton Keynes is highlighted in a Full Council resolution in October 2008 which includes resolutions to ‘promote public transport whilst maintaining ease of car movement’, and ‘not make changes to the existing grid road system’. Whilst an integral part of the character of the city, grid roads as originally developed do not provide a</td>
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<tr>
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<tr>
<td>sufficiently large to be able to provide their own grid networks that tie in with the MK grid mainframe and adopt the grid design to sustainable principles</td>
<td>sustainable network for the 21st century. The principle of extending grid roads into the Strategic Development Areas will be set out in the Vision.</td>
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<tr>
<td>Strategic Objectives</td>
<td>Need to stress the linkages and interdependence of objectives. Clearer explanation about performance measures is required and this should be more clearly linked to the Annual Monitoring Report</td>
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<tr>
<td>– As with policies, suggest the vision and objectives need to be SMART and outcome (rather than process) focussed. The emerging spatial objectives are just generalised statements of intent and do not define specific outcomes.</td>
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<tr>
<td>– Draw out the strategic objectives (that relate to the strategic outcomes the plan is meant to deliver) in such a way that, when considered alongside sustainability objectives, they will help you make the strategic decisions (and select outcomes from a range of reasonable alternatives) that together make up a coherent strategy</td>
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<tr>
<td>– Objectives should be grounded in reality; for example it should be clear that the aspiration to create a knowledge based economy will depend on improving skills and educational attainment within the resident workforce, and that the process of change will take time. Progress towards these objectives will need to be monitored</td>
<td></td>
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<tr>
<td>Delivering the Vision</td>
<td>Delivery and implementation mechanisms needed to achieve the vision and the development requirements of the Core Strategy need to be developed further in the production of the Core Strategy: Submission version.</td>
</tr>
<tr>
<td>– There is a lack of tangible policies in the Preferred Options paper to achieve some of the high aspirations, such as an international reputation as knowledge based city; growth will be balanced; a strategically planned and managed network of accessible, high quality public spaces.</td>
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<tr>
<td>– Support the spatial vision but consider that the document does not properly describe how to achieve it</td>
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<tr>
<td>Regional/Sub-regional context</td>
<td>Need to reflect in more detail the sub-regional context of Milton Keynes and the nature of surrounding growth</td>
</tr>
<tr>
<td>– The whole debate needs to be set in a sub-regional context and that is how the MK expansion plans should be evaluated</td>
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<tr>
<td>– In what respects is it intended that MK should develop as a ‘major regional centre’; what should it be a regional centre for?</td>
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<tr>
<td>South East Plan</td>
<td>As explained in the Important Note at the start of the document, the Preferred Options were prepared in the context of the draft South East</td>
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<tr>
<td>– The Core Strategy: Preferred Options document was prepared before the</td>
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</table>
### Summary of issue raised | Officer Response and Outcome (Recommendations in bold)
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Panel Report on the draft South East Plan was published. The Core Strategy should be amended to take account of relevant views and recommendations of the Panel. | Plan. The Core Strategy: Submission version will reflect the most up to date position regarding the RSS and housing numbers together with the results of further work on the SDA study etc.

### Background evidence
- MK Growth Strategy was no substitute for proper statutory plan-making processes and the difference needs to be explained, particularly how alternative options put forward were not assessed, and there is no information given about consultation responses and unanswered criticisms

### Outcomes
- The MK2031 work forms part of the background evidence base and options testing work behind the development planning process. Directions of growth were discussed and evaluated by an independent panel at the SEP Examination in Public

### B Growth Locations and Requirements

| Summary of issue raised | Officer Response and Outcome (Recommendations in bold) |
---|---|
**Urban extensions**
- Urban extensions and strategic development sites should certainly play a part in the expansion of Milton Keynes, however we should ensure that these developments are ‘suburban’; low/medium density developments and certainly not high density ghettos

| Outcomes |
---|
- The strategic development area extensions to Milton Keynes will have mixed density developments. Through developing design frameworks for the areas with input from local residents, developers and others with an interest in the area, the Council will ensure that these areas are planned and developed to a high standard.
- Agree that housing density should be appropriate to the site specific circumstances. Preferred Options encourages an adaptable approach to housing density with higher densities required in accessible locations to support an efficient public transport system and the viability of key facilities.

**Strategic Reserve Areas**
- The SEP Panel Report recommends that a detailed comparative study of the options of further development to the South West and to the east of the M1 is carried out prior to the next review of the South East Plan to ensure that informed judgements are made in determining the most sustainable strategy for Milton Keynes after 2026. It would therefore be wholly inappropriate and premature for the Core Strategy to identify any areas as Strategic Reserves in any location around MK or to propose a framework for development with far greater levels of development proposed around Newton Longville to 2026 than is recommended in the Strategic Reserve Areas

| Outcomes |
---|
- The strategic reserves shown in the Core Strategy are advance reserves for the period 2026–2031. They were identified in response to the MKSMSRS which suggests that there might be a need to accommodate a further 11,850 dwellings in the borough over that period. The suggested strategic reserves are only intended as a first area of search to meet possible but as yet undefined needs. The release of this land would only be brought forward as part of a formal review or alteration to the Core Strategy.
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<td><strong>SEP EIP Panel Report until this further work has been undertaken</strong></td>
<td>– There is a significant scale of development allocated and with planning permission in the main urban area and it is recognised that more work needs to be done to clarify the position regarding development in the urban area, which is subject to rigorous monitoring. This work is ongoing as part of the SHLAA and will help to inform the production of a robust Core Strategy. This work will have regard to the plan period of 2006 – 2026 and exclude completions in the period of 2001 – 2006. It will also look to identify and specify available, achievable and deliverable sites that could form part of the housing supply requirement over the plan period. The SHLAA will look at both urban and expansion sites, but will be constrained to the boundaries of Milton Keynes, so will only consider the housing requirements to be met within the administrative boundary. It will also look at the availability of sites within the rural area, separating land availability down into the same components as set out in the SEP. – Growth is located and distributed according to a number of constraints and opportunities including accessibility, the availability of land, environmental factors etc. New housing will be accompanied by an appropriate level of infrastructure to meet the needs of the existing and future residents</td>
</tr>
<tr>
<td><strong>Development in the urban area vs expansion sites</strong></td>
<td>– The approach is unrealistic in that it concentrates such a large amount of development within existing areas in a relatively new town that has limited opportunities for re-development. The majority of development should be concentrated at the expansion areas and smaller developments that are close to existing facilities. – Building all these homes suggested within the city boundary would destroy the successful character of Milton Keynes, and would lead to break up of the grid system. Maybe fewer homes are needed within the city boundary, and urban area growth should be treated as ‘windfall’ rather than relied upon. The risk in slow site assembly could be that we do not deliver the necessary homes in the South East Plan. – Growth should be located so that no single existing community has a disproportionate large number of housing (whatever local authority it is in)</td>
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<tr>
<td><strong>Villages and the rural area</strong></td>
<td>– Sherington is identified as a Selected Village for limited new development. The Council is currently carrying out a SHLAA which will assess the deliverability of the required level of development in the borough, including the Key Settlements of Newport Pagnell, Olney and Woburn Sands and the Selected Villages of Hanslope and Bow Brickhill. Subsequent chapters seek to ensure that any development is sustainable and will not have an adverse effect on existing settlements. – The three Key Settlements have a good level of services and facilities and are considered to offer sustainable locations for development in the rural area – Development in the rest of the Borough needs to be a balance between meeting housing needs and maintaining the rural character and the open countryside whilst ensuring that development is located in the most</td>
</tr>
<tr>
<td>– Concerns about the new building in Sherington village. Strongly oppose an estate being built if large numbers of dwellings are to be included in the development envelope as the basic infrastructure of the village possibly could not support the impact of these additional houses and people</td>
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<tr>
<td>– It is essential that only development approved by Sherington Parish Council is permitted, and that it is in line with the response submitted in December 2006, i.e. that it contributes to appropriate additions to village facilities and that the current difficulties with the village’s foul water sewage systems must be rectified as a pre-condition for any development.</td>
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<td>– The level of growth proposed for rural areas is based on historic levels.</td>
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<tr>
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| This is inappropriate and the levels should be related to specific needs of the rural areas in general and individual settlements in particular. Clearly there will be a need for some development in the rural areas in order to sustain services and meet housing needs. However, the use of historic building rates is not an acceptable means of achieving the growth required. It is more appropriate to locate development in and around the urban area and development in the rural areas limited principally to meeting local housing need. Smaller extensions to the urban area will provide better access to services and facilities than developments around rural settlements. Therefore the development of sites on the edge of the urban area should be promoted in advance of any significant allocations in rural settlements  
- The ‘evidence’ to support the housing provision for the rest of the Borough is that historically about 120 dwellings per annum have been completed. There has been no assessment of housing needs or whether this level of housing is appropriate to support local services and facilities  
- Document fails to distinguish between issues facing the genuinely rural communities, including villages, and those facing the market towns, apparently concluding that revitalising the towns is a solution to rural problems generally. It is notable that nothing is said about the maintenance or growth of employment in the (non-town) rural areas | sustainable locations. The SHMA will provide more information on housing needs.  
- More attention will be given to the rural part of the Borough in the Submission Document |
| Site specific, site promotion |  
Examples include  
Bow Brickhill, land at Paddocks Lane.  
Land at Stony Stratford  
Windmill site  
Shenley Dens  
Land at Newton Longville |  
- The Submission document will be supported by a Strategic Housing Land Availability Assessment which will look at the housing capacity of Milton Keynes. The assessment will focus on identifying sites within the urban area in order to meet the housing requirements in the South East Plan but will also highlight other locations that could possibly be suitable for housing development. The outcome of the study will help inform policies of the Core Strategy and Allocations DPD, however the identification of any site through the SHLAA does not necessarily mean that planning permission for residential use will be granted or that it will be allocated for housing in future development plans.  
- Any development in and around Newton Longville area will have to be considered by AVDC in their Local Development Framework |
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<tr>
<td><strong>Coalescence</strong></td>
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<td>− Support the need to prevent the coalescence of MK with existing settlements on its periphery. However it does not support that these settlements should play a future role for the communities for the growth areas. The two statements are in direct opposition, in particular in the aspect of rat running and other traffic and infrastructure. Consider that every action should be taken including the extension of green belt to ensure the protection of these settlements.</td>
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<td>− No measures are suggested of what a policy of non-coalescence might involve, other than that it will involve ‘green wedges’. This suggests a simplistic view that a physical landscape barrier will be a complete answer to the complex issues of identity. Nor does it address matters such as economic competition between the facilities in the town and its neighbour or, on the other hand, the potential advantages of synergy obtained in each having facilities that complement rather than compete.</td>
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<td><strong>Zero-carbon and energy efficiency etc</strong></td>
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<tr>
<td>− The risks fail to recognise those attached to proposed policy MI2 (Managing environmental impacts through energy efficient design/zero-carbon development) and its potential impact on delivery. The drive towards zero-carbon is in principle supported; however demonstration projects and impacts on housing delivery are unknown at this stage. Testing and research on the delivery of higher levels of the Code suggest that at present there are cost issues in its delivery and impacts on housing industry supply chain which are not yet fully understood</td>
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<td>− Whereas we support energy efficient designs, in order to create carbon zero communities, and in particular that the Council recognises that the delivery of renewable energy must be viable and policy should not place an undue burden on developers by unreasonable local requirements.</td>
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<tr>
<td>− Recommend that the Council avoid using generic phrases which simply seek to encourage the use of energy efficiency, renewable energy and the minimisation and management of waste and pollution, for example, as such phrases lack the detail and commitment necessary to ensure that such aspirations are achieved. Therefore, strongly recommend the</td>
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<tr>
<td>− It is the intention of the policy to protect the character and form of existing settlements. However, there will also be opportunities for these existing settlements to benefit from growth through the fact that it will provide an opportunity to improve the provision of key services, such as schools. It is not the intention that existing settlements will provide for growth areas but that where possible links that can benefit them can be explored and established.</td>
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<tr>
<td>− It is noted that more needs to be done than simply physically protect existing settlements by using green wedges. This will be reflected more clearly in the submission version of the document. There are many issues, including schooling and health provision, where new growth provide opportunities for to improve local services and facilities for existing residents. Much of this work will follow the Core Strategy when area specific plans are drawn up considering the specific needs of particular areas.</td>
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<tr>
<td>− Work is currently being undertaken to ensure that there is no conflict between the delivery of housing and PPD MI2, and to ensure the targets are viable. The report on renewable energy/energy efficiency by Impetus explains this in more detail.</td>
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<tr>
<td>− The final policy will take into account comments made on the over onerous nature of the targets and the finding of the ongoing work on energy efficiency and renewables to develop requirements that are, whilst being achievable, also meet the highest possible standards of sustainability at a given time.</td>
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<tr>
<td>− Consideration will be given in the submission version of the document to making appropriate changes to the structure of the chapter to ensure that the over-reaching sustainability requirements are effectively communicated. It was felt necessary to include the individual requirements separately in the preferred options to highlight the importance of each individual element of sustainability. This policy area will be strategic in nature, reflecting the Council’s commitment to sustainable development, with the detail to be delivered in future policy documents.</td>
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Summary of issue raised | Officer Response and Outcome (Recommendations in bold)
---|---
inclusion of an overarching climate change policy within the Core Strategy addressing the above issues, and the inclusion of discrete, pro-active policies on energy efficiency, renewable energy, sustainable design and construction, within the Development Control DPD, in order to provide detailed policy direction on each issue and ensure that such environmental measures are delivered |
| − The Council has had a requirement for housing to deliver ahead of the national standards by 25% minimum (in terms of the building regulations emissions standards) for over 2 years and the Council intends to continue to pursue the highest level of sustainability that is realistically achievable.
| − Work has been published to assess the viability of the targets set in the document. This will be reflected in the submission document. The offset fund is not a way out for developers who don’t want to provide zero carbon solutions. Policy will require that they are provided unless there is a very good reason why they cannot. The offset fund will remain in place to allow any carbon that cannot be offset through the development to be offset elsewhere. It is wrong to say that it will not support environmental sustainability, as shown by the business plan for the Carbon Offset Fund. At the present time the most effective way of achieving this is through improvements to loft and cavity wall insulation of older MK homes. This will be reviewed on a regular basis to ensure maximum environmental benefits are achieved from carbon offset contributions.
| − Ensure reference to green roofs is carried through into the Core Strategy: Submission version

C Housing

Summary of issue raised | Officer Response and Outcome (Recommendations in bold)
---|---
Housing Mix and Density |
| − Need to build more houses – not flats – that are available and affordable for local families. There also needs to be more homes available from the Council and/or Housing Associations that are made available at an affordable rent to families who do not want or can’t afford to buy – or rent, in the private sector |
| − The supply of houses is based on assessments of need across the borough. This is reviewed on a regular basis to, as far as possible, match supply and demand. This includes a mix of sizes, tenures and locations. Currently 30% of homes in all developments over 15 dwellings are required to be affordable – which means they are provided by means of some form of subsidy. MK has one of the highest completion rates of affordable homes in the region, with over 40% of homes being affordable in 2006/7.
| − It is acknowledged that HiMO’s have a role to play in catering for some housing needs and provision for HiMO housing could be made as part of the provision of market housing within the City, such provision could feature in development briefs for the new Strategic Development Areas.
| − HiMOS serve two important niches within the housing mix. These should be recognised and HiMOS to serve both niches should be built as purpose-designed buildings in the new areas. HiMOS can be affordable, meeting a key need for usually young, usually single people on low income or entirely living on benefits. Rather than leaving such provision to the
### Summary of issue raised

- Whims of private investors who may choose unsuitable locations, we could include such ‘social HiMOS’ in the development brief for relevant new communities – particularly near community amenities, bus routes etc in recognition of the low disposable income of the likely occupants. A second category exists, serving the young, professional, usually temporary residents of MK. For such people, a HiMO offers an instant network of social contacts in a place they don’t know, and a pleasant temporary home with more flexibility than purchasing or renting an entire house or flat. Clearly this group will have very different expectations and budgets for their accommodation.

- If there is a requirement to provide market housing which reflects the demand profile of all households, on all development sites, this would lead to a wide range of housing sizes in all developments. This range may not be suitable on some sites i.e. where the normal demand profile may lead to an inefficient use of land, for example in high density town centre locations. Policy NC3 should indicate that where appropriate market housing reflecting the demand profile should be provided.

- Consider that the high densities of some of the developments being planned is detrimental to the health and well being of its residents. Whilst supporting improvements to the public transport system, this should not be at the cost of health and well being of residents living in the new growth areas. We support a mix of housing provision, but we do not consider that densities should be above 40 dwellings per hectare, and we consider that far more accessible green space should form part of any design, in addition to green buffer protection from major through-roads.

### Social housing and affordability

- It is disappointing that the needs of ethnic minority groups have been singled out for special mention, over and above all other categories of special need: people with learning disabilities or physical disabilities, the elderly, those with particularly big or particularly small families, homes for multi-generation and other forms of extended families, not to mention homes for the silent, indigenous majority. Over time, the specific needs

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| Whims of private investors who may choose unsuitable locations, we could include such ‘social HiMOS’ in the development brief for relevant new communities – particularly near community amenities, bus routes etc in recognition of the low disposable income of the likely occupants. A second category exists, serving the young, professional, usually temporary residents of MK. For such people, a HiMO offers an instant network of social contacts in a place they don’t know, and a pleasant temporary home with more flexibility than purchasing or renting an entire house or flat. Clearly this group will have very different expectations and budgets for their accommodation. If there is a requirement to provide market housing which reflects the demand profile of all households, on all development sites, this would lead to a wide range of housing sizes in all developments. This range may not be suitable on some sites i.e. where the normal demand profile may lead to an inefficient use of land, for example in high density town centre locations. Policy NC3 should indicate that where appropriate market housing reflecting the demand profile should be provided. Consider that the high densities of some of the developments being planned is detrimental to the health and well being of its residents. Whilst supporting improvements to the public transport system, this should not be at the cost of health and well being of residents living in the new growth areas. We support a mix of housing provision, but we do not consider that densities should be above 40 dwellings per hectare, and we consider that far more accessible green space should form part of any design, in addition to green buffer protection from major through-roads. | Some developers build purpose built accommodation to accommodate groups such as students who also often occupy this type of accommodation. However, while there may be some advantages in a proactive approach to HiMO provision, concentrations of such housing units will still need to be carefully managed if the problems that these units generate are to be avoided. The officer/member working group on HIIMOs will address this issue in more detail. Officers from this group will inform the Core Strategy: Submission version.

- Noted. This is a continuation of an existing Local Plan policy position. There is a flexible approach taken to the policy which allows developments to positively respond to their context, such as higher density development in CMK. Final policy wording will make this clear in the Core Strategy: Submission version.

- It is noted that poorly planned, high density development can have, or appear to have a detrimental impact on health. However through good design any disbenefits of high density can be eradicated. Other areas of policy look to support the effective creation of places where people want to live and that support healthy lifestyles. This said, higher density development is not suitable for all locations. There will be circumstances where higher density is appropriate, such as CMK and other centres, and areas where it is not, such as urban fringe sites and village locations. Setting 40 dph as the maximum density would present problems in other areas- It would increase the land take needed for development, it wouldn't support public transport provision and it wouldn't allow development to respond to particular site characteristics. The need for a flexible approach to density is essential to make these things possible.

- The Council already seeks the provision of housing which meets certain priority needs housing for the elderly, supported housing and affordable housing (LP Policy H2) PPS3 on planning for housing states that "The Government’s key housing policy is to ensure that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live." It advises Local Planning Authorities in preparing strategic housing market assessments to estimate housing
and priorities will evolve, and the planning system (for both social and market housing) needs to be flexible enough to reflect this. Currently, two of the key needs for social housing are homes for large families and smaller, easy to manage homes for the impending "grey boom" of empty nesters. We need strategies to address these needs now, and to address future needs in the future. Market housing should indeed meet the demand profile of the economy and the households MK wishes to attract (noting that most new households will be people moving into the area), and it will take a new approach to planning to ensure that this happens rather than the current situation where developers create a housing mix to maximise their profit aspirations.

− Concern that there is not enough emphasis on the affordability of housing. We appreciate that this is a spatial strategy but it must take into account social factors. There must be much more emphasis on the social rented sector. That is the only truly affordable housing for many households. Shared ownership and similar types are no more affordable for many people these days than full owner occupier. Current government policies do not provide funding for the amount of affordable housing (social rent) that is required to meet the demand for it. There is thus a risk that homelessness will be made worse by these policies because insufficient social rental housing is delivered.

### Officer Response and Outcome (Recommendations in bold)

need and demand in terms of affordable and market housing and to consider future demographic trends and identify the accommodation requirement of specific groups such as homeless households Black and Minority Ethnic groups, first time buyers, disabled people, older people, Gypsies and travellers and occupational groups such as key workers, students and operational defence personnel.

− The Core Strategy will provide the strategic direction for Affordable Housing with the detail provided in a Supplementary Planning Document, which can be more readily updated when required. The Council has recently adopted its Affordable Housing SPD, which reflects the specific housing affordability needs in Milton Keynes at this time. This requires a 25 / 5% split (of the 30% required) between social rented housing and shared ownership housing respectively, which is a significant change from the previous requirements.

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<td><strong>Summary of issue raised</strong></td>
<td><strong>Officer Response and Outcome (Recommendations in bold)</strong></td>
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| **Transport context** | − The Transport Strategy for Growth has now been adopted. The Core Strategy takes account of the LTP on which the Transport Strategy for Growth is based. The strategy runs to 2016 but provides pointers in terms of transport policy and solutions beyond that point

− Introduce more detail and explanation into the Core Strategy: Submission version to explain and justify the transport strategy together with reference to the emerging Transport and related strategies under preparation in late 2008. |

− Clear need for the Core Strategy to reflect the Transport Strategy for Growth, including: East-West movements; Significant enhancement of public transport within the city to effect modal shift and help maintain capacity in the highway network; Treatment of the gateways to the City; Movement within the city as it currently exists and in terms of linking with the identified growth areas; Resolution of the approach to car parking in the city centre. |
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<tr>
<td>Consider it is imperative to understand how the future distribution of growth will impact upon the transport network and how alternative policies and strategies have been investigated to identify a prepared and deliverable transport strategy consistent with Core Strategy objectives and the wider policy context.</td>
<td>The Milton Keynes Business Plan addresses the key pieces of infrastructure identified to support the effective delivery of growth. The Joint Transport Delivery Team manages the identification and delivery of transport projects and the Business Plan already highlights how initiatives are underway to ensure a balanced and integrated approach towards the improvement of the transport system. It is recognised that this is a key area and consideration will be given as to how the transport needs of growth can be reflected in the Core Strategy: Submission version. This will include looking more specifically at work underway on issues such as parking and network management. The need to reflect more clearly some of the key projects is also agreed. Reference is made to these in the implementation section but consideration needs to be given to how these can be more effectively integrated into the core of the document.</td>
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<tr>
<td>Transport connections</td>
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<tr>
<td>Envisage this policy framework could refer to connecting MK with the surrounding area and improving connectivity within the district. We envisage this framework relating to the road network, bus services, rail, walking and cycling, smarter choices, accessibility, parking, freight and network management. We would also expect this policy framework to include key transport intersections identified as having regional significance and other strategically significant transport intersections within MK. These measures need to be capable of being delivered within the plan period and should also appear in the Key Diagram and in an achievable infrastructure/implementation plan.</td>
<td></td>
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<tr>
<td>Persuading motorists out of their cars and encouraging bus companies to provide safe, fast, cheap and attractive (old buses will not do) 24 hour city wide services are the key problems. Strong political will and the education and support of the general public will be needed.</td>
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<tr>
<td>Access to public transport network</td>
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<tr>
<td>Support the principle of shaping new developments in ways that facilitate direct routes for public transport and access to these services. However, the City as a whole needs a complete network of effective public transport services. If the planning of the location of developments is to relate to</td>
<td>The existing Quality Bus Initiative routes were identified to respond to the particular challenges and opportunities presented by these particular routes. The aspiration primarily was to improve the service provided on key routes north/south and east/west across the city. The Council has prepared a bus strategy to outline further how bus services can be</td>
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</table>
### Summary of issue raised

‘primarily the north/south and east/west Quality Bus Initiative transport corridors’ this suggests that plans are much less than a citywide quality network of buses. This would be inadequate to generate a substantial modal shift from private cars to buses. We appreciate the scale of the gap to be bridged, but the Core Strategy is a strategy for almost 20 years. If the aspiration for a significant modal shift is to be achieved, public transport will need to go through much more of a revolution than only two higher quality bus routes, with other routes operating to a lesser quality standard.

- It is considered that the text should make explicit reference to the need for development which supports and develops the East West Rail Link and the proposed stations, in addition to the Quality Bus Initiative transport corridors.
- Supportive of development of the public transport system(s) and grouping of development to encourage the use of public transport though not at the expense of the grid road system that protects residents from the noise and pollution and indeed danger of main roads. Against the City Street model and would wish to see the grid road system extended into the SW and SE urban extensions.

### Officer Response and Outcome (Recommendations in bold)

enhanced across the city, including looking at enhancing 8 core routes across the city and rationalising services on intermediate and feeder routes. There are also other individual projects identified, such as the CMK Public Transport Improvement Project, that are aimed at facilitating improvements to network. The submission version of the document will aim to give more details on future plans and how they link in with growth.

- **The need to provide more explicit support for east west rail is agreed.** Other areas of the document mention the role of east west rail in the growth of the city, showing the Council’s support for the principle. Consideration will be given to how this can be appropriately incorporated into the document, given its role in supporting sustainable movement patterns.
- The detailed design of the south east and south west growth areas is not something that will be explicitly addressed in the Core Strategy: Submission version. Broad principles may be set out. The importance of the grid road system is highlighted in a Full Council resolution from October 2008.

### Grid Roads

- The rationale given for moving away from the grid road approach is to rebalance the transport system in such a way as to remove or reduce the current tendency for the main roads to follow the most convenient routes while routes for transport on foot, bicycle or bus tend to be considerably less convenient. There must be a better way of achieving this rebalancing, probably by planning the walk, cycle and bus routes first and making the road network fit around them rather than vice versa, without creating an intentional conflict between car/lorry and walk/cycle/bus movement and between the motor vehicle and living environments on city streets. The city street concept implies such a strong dislike of car movement that it would rather hobble car movement through inconvenient interaction with other activities than prioritise the maintenance of a satisfactory living environment.
- The grid system is undoubtedly one of Milton Keynes greatest assets, as...
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<td>well as being one of the key components of that define the city's character. It is</td>
<td>The policy direction does not just focus on public</td>
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<td>therefore vital that the vision acknowledges.</td>
<td>transport, it highlights the need to create places</td>
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<tr>
<td>Other Transport Issues</td>
<td>where there are viable choices in how people travel</td>
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<td>– Sustainable transport is the goal; it may or may not be public. Create enough</td>
<td>within the city. Supporting a potentially more</td>
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<td>residential parking (even if we encourage people to use other modes for some</td>
<td>accessible public transport system is just one</td>
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<td>journeys). Plan for the sufficient delivery of Council services in new areas.</td>
<td>aspect of this. It is hoped that through adopting a</td>
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<td>comprehensive approach to the creation of sustainable</td>
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<td>communities some of the issues, including inappropriate</td>
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<td>parking provision, can be mitigated. There may be</td>
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<td>more cases where 'car-free' developments will be</td>
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<td>viable, but this will need to be in very specific</td>
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<td>circumstances and be part of a wider spatial solution</td>
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<td>that enables such developments to function</td>
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<td>successfully. Input from the Council's Transport</td>
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<td>Policy section will be key here to ensure parking</td>
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<td>solutions are appropriate for the circumstances.</td>
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<td>Changes will be considered to MI7 to relate to this.</td>
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### E Economy

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<th>Summary of issue raised</th>
<th>Officer Response and Outcome (Recommendations in bold)</th>
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<tr>
<td>Employment</td>
<td>The main thrust of policy ESRR1 is to ensure sufficient</td>
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<tr>
<td>– The intention to protect employment sites from redevelopment to other land uses</td>
<td>employment land and not to allow its redevelopment</td>
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<tr>
<td>does suggest that the supply of previously development land within the urban area</td>
<td>for other uses, including housing. The Council</td>
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<td>suitable for housing purposes may be limited.</td>
<td>considers that there is sufficient land available in</td>
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<td>– Employment should be located to minimise travel. The only sustainable forms of</td>
<td>the Urban Area to provide for the required 8,500</td>
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<tr>
<td>travel are walking and cycling. Employment should therefore be spread around the</td>
<td>housing numbers and which is dealt with in Chapter 4</td>
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<td>city to ensure that there is sufficient employment within walking or cycling</td>
<td>– The way the City has been planned means that</td>
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<td>distance of all housing to ensure that residents have the choice to use</td>
<td>employment development is dispersed across the City,</td>
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<td>sustainable methods of transport. Policy ESRR1 should support this aspiration.</td>
<td>which has a number of advantages including offering</td>
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<td>New development should provide safe, convenient and direct routes for walking and</td>
<td>employment opportunities close to where people live.</td>
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<td>cycling to all facilities including local employment. Public buildings including</td>
<td>However, the dispersed pattern means that it is</td>
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<td>places of work should have to provide proper facilities for cyclists including</td>
<td>more difficult to provide fast, frequent and viable</td>
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<tr>
<td>parking and changing rooms</td>
<td>bus services than if employment were concentrated</td>
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<td>in fewer locations. The ease with which those with</td>
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<td>cars can currently travel around the City also</td>
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<td>reduces the incentive for people to live close to</td>
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<td>where they work. MI 7 seeks to reduce reliance on the</td>
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<td>car and encourage travel by bus, cycle and on foot.</td>
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<td>It identifies locations such as CMK and other</td>
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<td>Summary of issue raised</td>
<td>Officer Response and Outcome (Recommendations in bold)</td>
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<tr>
<td>– Policy ESR1 should be amended to include a clear strategy for the attraction of sufficient inward investment to achieve the target of 48,850 (net) new jobs. It should identify the scale of promotional activity that is required and develop a clear and attractive image for selling MK as an employment location. MK should better understand the actual requirements and aspirations of business and these should be recognised within this policy</td>
<td>– town centres as the most appropriate and sustainable locations for town centre type uses which include employment uses.</td>
</tr>
<tr>
<td>– Strongly agree that Milton Keynes should be viewed as a key growth area within the South East, and that the expansion of the city should largely be led by the demands of the local economy, principally the number of jobs created within the urban area. Whilst we agree that the growth of the settlement should be managed with a view to protecting existing settlement patterns and communities, this should not ultimately compromise providing for the level of demand for both housing and associated services that exists within MK.</td>
<td>– There is a clear strategy to promote inward investment in Milton Keynes reflecting its status as a growth area. This is being undertaken by a number of agencies including &quot;Invest in Milton Keynes&quot;. Listing all the promotional activities to market Milton Keynes is inappropriate in a core strategy which is a strategic document. <strong>Make reference to &quot;Invest in Milton Keynes&quot; website.</strong> MKC is seeking to better understand the needs of business and has appointed additional staff to increase its capacity in this area.</td>
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<tr>
<td>– Development should be employment driven rather than housing driven</td>
<td>– Work is currently underway to look at how much land in the growth areas will be required to meet the housing need, when considered alongside other land uses. This includes factoring in the physical separation of existing settlements from the expanding Milton Keynes. This work should ensure that the need to protect existing settlements does not restrict the delivery of growth.</td>
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<tr>
<td>University</td>
<td>– The council should actively support the development of a new university but the concept needs to be more clearly defined. The Council should defined the aspiration better in order to be able to plan the resources and land needed</td>
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<tr>
<td>– The Council should remember that virtually every town of any size nowadays has its ‘uni’ and that this hardly results in making such places ‘knowledge based’. If MK wants to seriously ‘up’ its currently low skills base, it will have to do much better than this. In addition to investing at the tertiary level, MK also needs to invest in better educational foundations</td>
<td>– The Council is establishing a new university in Milton Keynes and the new University Centre is now open. The ‘model’ of the university will be established following discussions with the Government and other key stakeholders</td>
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<td>– The importance of improving education at pre-school and primary school level for the benefits this would bring is acknowledged, but the resource issues involved are beyond the direct scope of the Core Strategy</td>
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### Natural and Historic Environment

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| **Built and Historic Environment** | – Reference to the built environment throughout MK can be strengthened and emphasised in CMK.  
– The correct balance needs to be struck between protection of a finite resource and the ability to respond to changes in the built environment. The preparation of Area Action Plans, site specific development frameworks and other SPDs/DPDs should reflect the particular characteristics of each area and take into account constraints including cultural heritage. Protection of the historic environment and flexibility to allow economic growth and development are not mutually exclusive. |
| – An assessment of CMK (and outlying structures of significance) is required in order to establish what is special and significant in respect to MK’s built environment. Once established this can be added to the framework against which future redevelopments can be evaluated, in order to balance economic pressures against significance of the MK built environment.  
– Support the approach to protect and enhance the character, diversity and cultural significance of the Borough’s historic assets, although this should reflect the ability of New Town buildings, to adapt to changing needs in their respective use classes, i.e. leisure, retail and office uses. In addition, making greater use of conservation areas must reflect existing land use designations and committed development proposals, including the Government’s aim of achieving higher density, sustainable mixed use developments. The designation of such areas as conservation areas, and the listing if buildings therein may stifle the delivery of development, especially in Central Milton Keynes; which in turn will impact on Milton Keynes ‘regional centre’ status. | |
| **Nature conservation and biodiversity** | – Noted  
– The location of sites will be shown on the Proposals Map – they are too detailed to be shown on the Key Diagram. **The Core Strategy: Submission version will however refer to the hierarchy of nature conservation sites and will identify strategic sites including those within and close to the proposed growth areas.** |
| – Consider that policies aimed at nature conservation should be focused on those species and habitats that are of acknowledged importance. This approach will ensure that resources are focused in areas where the greatest effect can be achieved. Agree that it is important that the effects of planned development are properly mitigated, whether through avoidance, reduction or compensation  
– Strongly supportive of the approach to joint working with the Bucks and Milton Keynes Biodiversity Partnership in Biodiversity Opportunity Areas. Also pleased to see the Council’s commitment to the development of biodiversity guidance notes. Would suggest that the delivery strategy indicates where within the LDF designated sites and priority habitat areas will be mapped since they are the basis for implementation of the policy. | |
### Summary of issue raised

**Green Infrastructure**
- Of particular importance to the people of MK is the enhancement of green infrastructure and open spaces. This must be preserved with the CMK regeneration and continued within the urban extensions.
- With regard to green space in a planned settlement, it is important that the function of each such space be properly assessed. A local open space strategy should inform the policies and take account of quality and utility rather than simply quantity. In particular opportunities should be taken to create recreational facilities tailored to the needs and requirements of the local population, whilst using the land in the most efficient way.
- It is important that suitable policy protection is given to landscape buffers and other features that perform this function in the vicinity of the planned urban extensions.
- Fully supportive of the aim to maintain and enhance green infrastructure and open space, and stress the part that the Grand Union canal and its banks and towpath and the MK waterway project can play.

**Community Infrastructure**

- The contribution that green infrastructure makes to the setting of buildings and conservation areas needs to be drawn out.
- The Council’s Public Open Space planning policy (Local Plan) recognises the quality and function of open space. The Green Infrastructure Study moves the Strategic Open Space issue forward.
- The Green Infrastructure Study looks at the growth areas and how links can be made to green space and recreational routes in adjoining areas.
- The submission document will include more detail on green infrastructure to be associated with expansion areas as part of the strategic place shaping policies for those areas.
- Aware of the benefits that water can bring to the quality and value of green infrastructure due to the existing lakes within Milton Keynes and this is recognised in the emerging GI study.

### Officer Response and Outcome (Recommendations in bold)

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<td><strong>Community Safety</strong></td>
<td>- Reflect community safety issues in the Core Strategy: Submission version</td>
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<td>The Core Strategy is identified as the spatial expression of the Sustainable Community Strategy, but fails to highlight community safety among the range of policies and programmes listed. While high quality well-designed housing is mentioned, specific reference should be made to ‘safety’ and designing out crime both in property units and external areas and the public domain. The scale of development will, as acknowledged, create “significant areas of new communities”. The character of existing neighbourhoods will change, in many cases significantly, with increased building densities and hardening of some regeneration and central areas, with an increased emphasis on the night time economy. This will all have an impact on the need for police resources and infrastructure. A truly successful growing community requires a balanced approach between maintaining the character of the existing areas and the provision of new safe, secure and vibrant communities.</td>
<td>- The principle that safety and designing out crime should appear at an early stage in the design of housing and the public realm is not disputed. This is a detailed point perhaps best dealt with in development briefs for new housing and public areas. <strong>Make references to incorporate public safety and designing out crime.</strong></td>
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<td><strong>Safety</strong></td>
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<td>- The need for a balanced approach between preventing crime at source, through design that minimises opportunities for criminal activity, and putting provisions in place to manage the impacts (i.e. the appropriate provision of services) is recognised. The Core Strategy refers to the design of places and the appropriate provision of required services. The Council is committed to ensuring that all of the emergency services have an input into how new communities grow so they can deliver their services.</td>
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### Summary of issue raised

- City needs a safe environment. It needs to ensure fear of crime does not increase. It needs to be safe to attract and retain new population and new business. If community safety is not recognised and its infrastructure not provided for, then the current level of safety cannot be guaranteed going forward.
- Emphasise the need for the planning process to ensure that appropriate community safety infrastructure is provided for in the identified locations through planning obligations.

### Officer Response and Outcome (Recommendations in bold)

- Noted. The main focus of retail, office and cultural facilities will be Central Milton Keynes. Existing cultural facilities elsewhere will be maintained and enhanced, where practicable.
- The creation of new sporting facilities of national significance at the most sustainable locations in MK can help to promote the City and need not be at the expense of grass roots sport participation. Various sporting activities often complement each other and receive separate funding streams and so need not be in competition with each other. Developing national sporting facilities need not put pressure on existing green spaces, it depends on the location of the facility.
- Some funding for assisting social development (community houses) already sought by MKC as a planning obligation, but further funding for social development is primarily a budgetary issue.
- The aspiration is for policy to be introduced that seeks the development of high quality public realm that encourages people to be active in their local area, increasing the opportunities for social interaction. The role of Area Action Plans and development briefs in comprehensively planning new communities, balancing the various land use needs in growth areas, will be essential in delivering this successfully. There will be input from the Council’s Urban Design team to ensure that the design process fully considers the need for a variety of spaces and linkages making places people can use effectively. The role of the Milton Keynes Council of Voluntary Organisations will also be important in engaging and supporting new communities as they grow. Consideration will be given to reflecting this in the Core Strategy: Submission version.

### Cultural, Leisure and Community Facilities

- The amount of retail, office, housing and cultural growth needs to be held in careful balance to ensure that one dimension does not dominate CMK.
  - All dimensions will require specific infrastructure. Cultural facilities in the centre should be development but not at the expense of cultural facilities in Wolverton and Bletchley.
  - Priority needs to be given to grass roots participation (not national sports facilities), especially in walking, running and cycling. These are part of healthy lifestyles, open to all without great cost and make use of existing facilities.
  - Sport is important, but at present MK has a cultural deficit, not a sporting one.
  - There should be a wide range of services and activities within easy reach of homes to reduce car ownership and use. These include schools, shops, community centres, libraries etc which provide the places for the social and cultural interaction which binds communities together. A far greater emphasis needs to be given to social development. This should extend from providing arrival workers on new estates to starter funding community based activities.
  - Social development in the new areas is understated. It is easy to provide the physical infrastructure but a lot more planning and commitment needs to go into developing the social fabric of new communities. Many of the new estates are bland car-oriented soulless places. Places where people can meet and share mutual interests are essential.
  - The next iteration of the Core Strategy should reflect the need for a more
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<td>cohesive approach to the community and voluntary sectors in terms of policy and strategy development. This relates in particular to resources and how the Section 106 process can be enhanced to deliver a more sustainable approach to the development of community and voluntary sector facilities and activities. Specifically, we would ask that the community and voluntary sectors are involved at the earliest possible stage of the process rather than being presented by a 'fait accomplis' that cannot be delivered in any meaningful sense.</td>
<td>- It is the intention of Milton Keynes Council to involve all stakeholders, including the community and voluntary sectors, in the earliest stages of the delivery process so that sustainable communities can be delivered</td>
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<td><strong>Access to services</strong></td>
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<td>- Policy advocates increasing accessibility to local services but conflicts with the general approach to the identification of land for housing. In order to truly increase accessibility to services, it is important that existing services are fully utilised. The current strategic approach does not allow for the location of development to utilise existing services and therefore, fails to adopt the most sustainable approach to growth. The use of sites which can utilise existing services should be encouraged and therefore, allocations should be made on land other than the locations indicated</td>
<td>- Increasing accessibility to local services does not conflict with the general approach to the identification of land for housing. New development can be served from existing facilities.</td>
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<td><strong>Emergency Services</strong></td>
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<tr>
<td>- Pro-active engagement with all key service providers at an early stage. Ideally these providers should be listed somewhere and include the emergency services.</td>
<td>- Agreed</td>
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<td>- Key infrastructure should specifically include the emergency services</td>
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<td><strong>H Delivery</strong></td>
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<td><strong>Summary of issue raised</strong></td>
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<td><strong>Delivery of housing growth</strong></td>
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<tr>
<td>- A key risk to the delivery of the strategy is the need to increase housing completion rates. The risk is that the market will not be able to deliver the increased housing completion rates. The planning system is a key part of the market. However, the general economic picture, resulting market confidence and housebuilders decisions about profit margins will play the largest part and thus pose the greatest risk. The recent turbulence in the</td>
<td>- The AMR is prepared by the Council on a yearly basis and is used as a mechanism to identify changes in social, economic and population trends within the borough and the impacts these may have on the delivery of housing. The Strategic Housing Market Assessment provides information about housing need. The recent events in national and global markets will need to be referenced in the Submission Document.</td>
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<td>- The Strategic Housing Land Availability Assessment identifies a supply of</td>
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<td>financial markets is also a key factor that will affect house prices and thus construction rates</td>
<td>deliverable sites for at least the first 10 years of the plan period. It is subject to an annual review in the AMR. Furthermore, the Joint Housing Delivery Team assesses the deliverability of sales on a monthly basis.</td>
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<tr>
<td>The strategy being put forward relies on additional capacity from the Local Plan allocations in the period 2011-2016. However, it is considered that an alternative approach is needed in case these sites are not developed at sufficient rate to provide the annual completions required. It is suggested that a workable solution would be for the Core Strategy to include a trigger policy allowing one or more of the Strategic Reserve Areas in the current Local Plan to be brought forward to meet any shortfall</td>
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</tr>
<tr>
<td>The reliance on a very small number of urban extensions and also development in the urban area centred around only three locations is likely to hinder the Council’s attempts to increase housing growth. Experience shows that in specific locations it is only possible to sell a limited number of new properties each year. It is simply not possible to increase this by constructing more houses.</td>
<td></td>
</tr>
<tr>
<td>The two Growth Areas should be phased and run in parallel to help ensure that targeted annual completions are met and a ‘step change’ in housing delivery in MK is delivered</td>
<td></td>
</tr>
<tr>
<td>The proposed housing completion rates are highly ambitious and we question whether the right governance and planning structures are in place to achieve a high quality of development at such a scale and pace.</td>
<td></td>
</tr>
</tbody>
</table>

**Joint Working**

Unclear as to what the formal arrangements for joint working are. Appears to suggest that where the strategic extensions overlap the Borough boundaries, documents will be produced by the respective authorities in parallel rather than jointly. The potential delays in delivering the urban extensions within adjoining authorities have been understated. It is not acceptable to recognise that problems will occur and not to actively plan for their resolution so that there is no delay in the delivery of these sites; the early implementation of which will be crucial to the success of the Growth Area and the Government’s Sustainable Communities Plan.

<table>
<thead>
<tr>
<th>Officer Response and Outcome (Recommendations in bold)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>The approach to joint-working will be explained more clearly in the submission document</td>
<td></td>
</tr>
<tr>
<td>Joint working has commenced in regards to the SDAs in the form of a detailed study of the SE and SW growth areas. A report on the findings has been published. Further joint working will follow based on this initial work.</td>
<td></td>
</tr>
</tbody>
</table>
### Summary of issue raised

#### Long term boundaries
- While MKC may not see the need for a long term boundary around the city, it is essential that the existing settlement of Aspley Guise is protected from any further expansion of MK to avoid the sort of coalescence that has swamped other villages. The need to protect AG has long been recognised and is reflected in the MKSMSRS, the Growth Strategy and the Core Strategy. The green belt extension proposed by MBDC in their Core Strategy would be a natural way of achieving this and would help to start alleviating the anxiety that the MKCS proposals have created within AG. While the creation of a form of managed parkland may provide an alternative form of green buffer in the longer term, the green belt proposal is necessary to provide certainty and confidence in the local community in the intervening 14 or more years. If the land protected by the green belt is to become managed green space thereafter the green belt designation will not be an impediment to the growth proposed in the MKCS.

#### Infrastructure
- For the new phase of expansion to retain public support it is essential that the Core Strategy should contain clear procedures to ensure that the necessary infrastructure for each development will be put into place in advance of completion of the development; and to make clear what that infrastructure is. With so many different bodies, agencies, developers and commercial interests involved and the funding risks identified in the document, these procedures need to be robust, even at the risk of delaying housing completions. We suggest that there should be clear ‘break points’ that would enable the start of proposed housing development to be delayed in a particular area where defined infrastructure would not be provided at the appropriate times. On the other hand, the aim should be for development in each residential area to be driven at sufficient pace – once it had been started on site – to provide sufficient demand for each item of infrastructure. It would be helpful to see the term ‘infrastructure’ defined within the Core Strategy, so that there is no ambiguity about expectations. If a delay in infrastructure

### Officer Response and Outcome (Recommendations in bold)

- MKC considers that linear parks and other open space designations provide an effective way of using green infrastructure to avoid coalescence, to mitigate the impact of development on existing settlements, and to provide attractive facilities/open space accessible to both existing and new residents.

- The whole ethos of the tariff is that enables forward funding of the key infrastructure needed to ensure growth occurs in a sustainable manner. The Business Plan system and the Joint Delivery teams, made up of key stakeholders, are in place to ensure the effective identification and delivery of the required infrastructure in a timely and effective manner. Work has been carried out based on the expected pace of housing completions to ensure that it is known when each piece of infrastructure will need to be completed. The use of the term infrastructure will be tightened up in the submission version of the document so it can be seen more clearly what ‘infrastructure’ particular policies are talking about. The tariff has mechanisms to ensure delivery takes place at the required pace, and also to ensure the timely delivery of the facilities. It is expected that a similar approach will be adopted for the future growth areas. The forward funding nature of the tariff means that facilities should be provided at the right time.
### Summary of issue raised

<table>
<thead>
<tr>
<th>Office Response and Outcome (Recommendations in bold)</th>
</tr>
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<tbody>
<tr>
<td>provision might threaten delivery of housing targets, the Council must not be deflected by a concern to hit those targets. Instead it is vital to the sustainability of developments, and the longer-term credibility of the growth project, that procedures enable relevant housing developments to be slowed or frozen until the required infrastructure catches up. The Council should be determined in its pursuit of such provision, where necessary pointing out that the failures lie elsewhere.</td>
</tr>
<tr>
<td>There is no mention of having to deliver infrastructure which will have their own constraints to enable the housing to be successfully delivered</td>
</tr>
<tr>
<td>The targets for the delivery of housing at Milton Keynes are such that there is no scope to artificially restrain development. It is therefore important that infrastructure should be delivered in a timeframe that does not constrain the release of land for development. This is one of the advantages of the tariff systems, in that it secures from developers the appropriate level of funding for strategic infrastructure and, the payment having been made, allows development to proceed unimpeded. The Consortium would want this approach to continue so that the targets for residential and other forms of development are achieved.</td>
</tr>
</tbody>
</table>

### Timescales

<table>
<thead>
<tr>
<th>Officer Response and Outcome (Recommendations in bold)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2026 is in line with the South East Plan. While it is not intended to identify areas of growth beyond this, reference will be made to not prejudicing future growth through the implementation of development up to 2026</td>
</tr>
</tbody>
</table>

Object to the approach in the Core Strategy which only considers growth to 2026. In this regard, we recognise that it would be premature to set firm housing numbers for the period beyond 2026 but it is not premature to recognise the fact that Milton Keynes will need to continue growing beyond 2026. Consider that specific growth areas beyond 2026 should not be identified in the LDF but that potential areas of growth should be indicated on the Proposals Map so that due regard can be paid to the effects of LDF growth on future spatial options.
## Document Specifics

<table>
<thead>
<tr>
<th>Summary of issue raised</th>
<th>Officer Response and Outcome (Recommendations in bold)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Detail and length of document</strong></td>
<td></td>
</tr>
<tr>
<td>– The document by its nature does need to go into some depth in relation to the overarching vision, and objectives and is therefore the level of information is not too detailed for a strategic document</td>
<td>– Noted</td>
</tr>
<tr>
<td>– The level of information is too detailed.</td>
<td>– The preferred options document is not the final policy document. It was written to explain process and outline how the Council has got to the position it has. The final document will be less explanatory but will continue to explain how future plans will flow from the Core Strategy</td>
</tr>
<tr>
<td>– The document assumes a significant amount of knowledge and understanding of planning and growth. Some groups, organisations and individuals will have this knowledge. Others won’t and it might be helpful to break the Core Strategy down into bite-sized chunks</td>
<td>– It is noted that the language may be difficult to understand for all, but the nature of a planning document means that this cannot always be overcome. The Core Strategy: Submission version will use ‘plain English’ wherever possible</td>
</tr>
<tr>
<td><strong>Key Diagram</strong></td>
<td></td>
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<tr>
<td>– We do not consider that the Key Diagram is as clear as it should be.</td>
<td>– The finer detail will be given through the proposals map. The key diagram is a strategic plan which does not provide such fine grain detail, just broad areas with no defined boundaries.</td>
</tr>
<tr>
<td>– The diagram is highly misleading.</td>
<td>– Agree that some improvements should be made to the clarity of the key diagram. However, it is difficult to show too much detailed information on what is deliberately an indicative diagram showing broad areas and concepts.</td>
</tr>
<tr>
<td>– Fails to include sufficient detail, particularly in relation to the existing and proposed strategic road network, green spaces etc</td>
<td></td>
</tr>
</tbody>
</table>
APPENDIX C  CORE STRATEGY: PRE-SUBMISSION PUBLICATION STAGE

C1  STATEMENT OF REPRESENTATIONS PROCEDURE AND STATEMENT OF ARRANGEMENTS

STATEMENT OF REPRESENTATIONS PROCEDURE

MILTON KEYNES LOCAL DEVELOPMENT FRAMEWORK
CORE STRATEGY: PRE-SUBMISSION PUBLICATION

Planning and Compulsory Purchase Act 2004
Regulation 27 – ‘Publication of a development plan document’

Milton Keynes Council has published its Core Strategy: Pre-Submission Version for a six week period of pre-submission publication from Wednesday 17th February – Wednesday 31st March 2010.

As part of the Milton Keynes Local Development Framework, Milton Keynes Council plans to submit the Core Strategy Development Plan Document to the Secretary of State for Communities and Local Government. The submission documents, including the Core Strategy: Pre-Submission Version, are being published for public representations.

Title of Document: Milton Keynes Core Strategy Development Plan Document

Subject matter: The Milton Keynes Core Strategy sets out the vision for the Borough in the year 2026 and how we are going to get there. It provides the objectives and strategy for the future development of the city and identifies the major areas where growth and change will take place. All future planning policies and documents within the Local Development Framework will be in accordance with the Core Strategy and help deliver its vision and principles.

Area covered: The Core Strategy covers the whole of Milton Keynes Borough administrative area.


Address to which representations should be sent:
By post: Development Plans Team Milton Keynes Council FREEPOST NATE 294 Spatial Planning Civic Offices 1 Saxon Gate East Central Milton Keynes MK9 3BR
By email: corestrategy@milton-keynes.gov.uk
By fax: 01908 252330
Online: http://miltonkeynes-consult.limehouse.co.uk
Please note the following:

1. All responses should be made on the Representations form. Representations may be made in writing or by way of electronic communications.

2. Representations may be accompanied by a request to be notified at a specified address of any of the following:
   a. That the Milton Keynes Core Strategy has been submitted for independent examination
   b. The publication of the recommendations of any person appointed to carry out an independent examination of the Milton Keynes Core Strategy
   c. The adoption of the Milton Keynes Core Strategy.

**STATEMENT OF ARRANGEMENTS FOR INSPECTION OF THE CORE STRATEGY AND OTHER SUBMISSION DOCUMENTS**

All submission documents, including the Milton Keynes Core Strategy and other supporting documents, will be available to view and download on the Council’s website at [http://www.milton-keynes.gov.uk/core-strategy-publication](http://www.milton-keynes.gov.uk/core-strategy-publication).

In addition, documents will also be available for inspection at the Council’s Civic Offices (1 Saxon Gate East, Central Milton Keynes). All libraries within the Borough will also hold reference copies of the Milton Keynes Core Strategy: Pre-Submission Version and Sustainability Appraisal. The location and opening times of your nearest library can be found on the Council’s website at [http://www.miltonkeynes.gov.uk/library_services/DisplayArticle.asp?ID=21971](http://www.miltonkeynes.gov.uk/library_services/DisplayArticle.asp?ID=21971).

All representations on the Core Strategy should be made using the ‘Representation Form’. This will ensure that the Council has all the information needed to process any representation you wish to make. You should refer to the ‘Guidance Note for Respondents’ before completing the form. Copies of the Representation Form and Guidance Note for Respondents are available online, at the Civic Offices, from all public libraries in the Borough or by contacting the Development Plans Team (as below).

The Representation Form can be completed online using our ‘Limehouse’ consultation system at [http://miltonkeynes-consult.limehouse.co.uk](http://miltonkeynes-consult.limehouse.co.uk). Alternatively, you can fill in a Representation Form and post, email, or fax it back to the Development Plans Team:

- By email, to corestrategy@milton-keynes.gov.uk;
- By fax, to 01908 252330;
- By post, using our freepost address (no stamp needed) to Development Plans Team, Milton Keynes Council, FREEPOST NATE 294, Spatial Planning, Civic Offices, 1 Saxon Gate East, Central Milton Keynes, MK9 3BR.

All comments on the Core Strategy: Pre-Submission Version must be received by the Development Plans Team no later than **5pm on Wednesday 31st March 2010**.

Comments received on the Core Strategy: Pre-Submission Version will be considered alongside the submitted Core Strategy as part of an examination by an independent Planning Inspector. All comments received at this stage must relate to legal compliance or the tests of soundness. See the ‘Guidance Note for Respondents’ for details. Please note that copies of all comments (including your personal details) will be made available for the public to view, and therefore cannot be treated as confidential.

If you need further information or assistance, please contact the Council’s Development Plans Team by telephone on 01908 252599 or by email at development.plans@milton-keynes.gov.uk.
As used in statutory notices, appearing in

**MK News** (17 February, 2010)

**Milton Keynes Citizen** (18 February, 2010).
C2 REPRESENTATION FORM AND GUIDANCE NOTE FOR RESPONDENTS
Please read the ‘Guidance Note for Respondents’ (at the end of this form) before completing this form.

Please return to Milton Keynes Council by **5pm on Wednesday 31st March 2010**. This form can be completed **online** using our ‘Limehouse’ consultation system at [http://miltonkeynes-consult.limehouse.co.uk](http://miltonkeynes-consult.limehouse.co.uk), where you can also print or save a copy for your own records.

Alternatively, you can send completed forms to us:
- **By email**, to corestrategy@milton-keynes.gov.uk
- **By fax**, to 01908 252330
- **By post** using our freepost address, to Development Plans Team, Milton Keynes Council, FREEPOST NATE 294, Spatial Planning, Civic Offices, 1 Saxon Gate East, Central Milton Keynes, MK9 3BR

Please do not send duplicates. Note that all comments will be made available for the public to read and therefore **cannot be treated as confidential**. Type or print clearly in black or blue ink. Use a separate form for each representation. If you use additional sheets, please mark them clearly with your name or organisation.

<table>
<thead>
<tr>
<th>Personal Details</th>
<th>Agent Details (if applicable)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title</td>
<td></td>
</tr>
<tr>
<td>First Name</td>
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<td>Last Name</td>
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<td>Job Title (where relevant)</td>
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<td>Organisation (where relevant)</td>
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<td>Address</td>
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<td>Telephone Number</td>
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</tr>
<tr>
<td>Email Address</td>
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</tbody>
</table>
Name or Organisation:

**Representation Details**

**Q1. To which part of the Core Strategy does this representation relate?** Please use a separate form for each section you wish to comment on

<table>
<thead>
<tr>
<th>Policy Number</th>
<th>CS</th>
<th>Paragraph Number</th>
</tr>
</thead>
</table>

**Q2. Do you consider the Core Strategy is...?** Please mark one answer for each question

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>(a) Legally compliant</td>
<td></td>
<td></td>
</tr>
<tr>
<td>(b) Sound</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

If you answered ‘No’ to Q2(b), please complete Q3. In all other circumstances, please go straight to Q4.

**Q3. Do you consider the Core Strategy is unsound because it is not...** (please mark all you think apply)

<table>
<thead>
<tr>
<th></th>
<th>(a) Justified</th>
<th>(b) Effective</th>
<th>(c) Consistent with national policy</th>
</tr>
</thead>
</table>

**Q4. Please give details of why you consider the Core Strategy is not legally compliant or is unsound.** Please be as precise as possible. If you wish to support the legal compliance of the Core Strategy, please also use this box to set out your comments.

*Continue on a separate sheet if necessary. Mark any additional pages with your name or organisation*
Q5. Please set out what change(s) you consider necessary to make the Core Strategy legally compliant or sound, having regard to the test you have identified in Q3 where your comment relates to soundness. You will need to say why this change will make the Core Strategy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Continue on a separate sheet if necessary. Mark any additional pages with your name or organisation

Q6. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

(a) No, I do not wish to participate at the oral examination

(b) Yes, I wish to participate at the oral examination

Q7. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the examination.

Q8. Do you wish to be notified of any of the following? Please mark all that apply. We will contact you using the details you have given above unless you specify an alternative address.

(a) when the Core Strategy DPD has been submitted for independent examination

(b) when the Inspector’s Report is published

(c) when Milton Keynes Council adopts the Core Strategy

Signature

Date
MILTON KEYNES
LOCAL DEVELOPMENT FRAMEWORK

CORE STRATEGY
PRE-SUBMISSION PUBLICATION

GUIDANCE NOTE FOR RESPONDENTS

Publication Period:

Wednesday 17th February –
Wednesday 31st March 2010
Introduction
The purpose of this Guidance Note is to assist those wanting to make representations on the Core Strategy: Pre-Submission Version (which can be viewed online at http://www.milton-keynes.gov.uk/planning-policy/DisplayArticle.asp?ID=69029). The Core Strategy: Pre-Submission Version is available as part of the ‘pre-submission publication’ stage, to allow the public and other stakeholders to make comments prior to submission to the Secretary of State. The representations will be considered alongside the Core Strategy as part of the examination by an independent Planning Inspector.

The Planning and Compulsory Purchase Act 2004 (the 2004 Act, http://opsi.gov.uk/ACTS/acts2004/ukpga_20040005_en_1) states that the purpose of the examination is to consider whether a development plan document (DPD) complies with the legal requirements and is ‘sound’. You should remember when responding at this publication stage that any objections you make to the Core Strategy must relate to legal compliance or soundness. Question 2 on the Representation Form asks whether your comment relates to legal compliance or soundness.

- If you are seeking to make representations on the way in which Milton Keynes Council has prepared the Core Strategy, it is likely that your comments or objections will relate to a matter of legal compliance.
- If it is the actual content on which you wish to comment or object to, it is likely it will relate to whether the Core Strategy is justified, effective or consistent with national policy.

Legal Compliance
You should consider the following before making a representation on legal compliance:

- The Core Strategy should be within the current Local Development Scheme (LDS) and the key stages should have been followed. The LDS is effectively a programme of work prepared by the Council, setting out the Local Development Documents it proposes to produce over a 3 year period. Our most recent LDS (published April 2009) includes the Core Strategy, and indicated that this pre-submission publication stage would be carried out in summer 2009. It is acknowledged that the Council has experienced delays against this timescale of around six months. However this has been discussed with and accepted by the Government Office for the South East (GOSE). The required key stages in the preparation of the Core Strategy have all been followed.

- The process of community involvement for the Core Strategy should be in general accordance with the Council’s Statement of Community Involvement (SCI). The SCI is a document which sets out the Council’s strategy for involving the community in the preparation and revision of Local Development Documents (including the Core Strategy) and the consideration of planning applications. The Milton Keynes SCI was adopted in December 2006. The Statement of Consultation accompanying the Core Strategy sets out how consultation has been undertaken throughout the document’s preparation in accordance with the SCI.

- The Core Strategy should comply with the Regulations (i.e. the Town and Country Planning (Local Development)(England) Regulations 2004, as amended (see http://www.opsi.gov.uk/si/si2004/20042204.htm for the 2004 regulations, http://www.opsi.gov.uk/si/si2008/uksi_20081371_en_1 for the 2008 amendment and http://www.opsi.gov.uk/si/si2009/uksi_20090401_en_1 for the 2009 amendment). At this stage, the Council must publish the documents prescribed in the regulations, and make them available at their principal office and their website. The Council must also place local advertisements and notify the DPD bodies (as set out in the regulations) and any persons who have requested to be notified. The ‘Statement of Representations Procedure’ and ‘Statement of arrangements for inspection of the Core Strategy and other submission documents’ fulfil these requirements, and can be viewed on the Council’s website, at the Civic Offices, at the public libraries and in a newspaper notice.
The Council is required to provide a Sustainability Appraisal Report when it publishes a DPD. As part of the development of the Core Strategy, a Sustainability Appraisal (SA) has been prepared. The SA is a tool for appraising policies to ensure they reflect social, environmental and economic factors. The SA is available in all the places the Core Strategy: Pre-Submission Version is available, as a supporting/submission document.

The Core Strategy should have regard to national policy and conform generally to the Regional Spatial Strategy (RSS). The Council believes that the Core Strategy is in general conformity with national policy (as set out in the Government’s planning policy statements and guidance notes) and the RSS (South East Plan).

The Core Strategy must have regard to the Sustainable Community Strategy (SCS) for Milton Keynes. The SCS was prepared by the Local Strategic Partnership which is representative of a range of interests in Milton Keynes. The SCS is subject to consultation and was refreshed by the Council in 2008. The Core Strategy is a key delivery mechanism for the vision and principles in the SCS and these principles have informed the preparation of the Core Strategy.

**Soundness**
To be sound, a DPD should be:

*a) Justified*  
This means that the Core Strategy should be founded on a robust and credible evidence base involving:

- Evidence of participation of the local community and others having a stake in the area;
- Research/fact finding: the choices made in the plan are backed up by facts.

The Core Strategy should also provide the most appropriate strategy when considered against reasonable alternatives. These alternatives should be realistic and subject to Sustainability Appraisal. The Core Strategy should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved.

*b) Effective*  
This means that the Core Strategy should be deliverable, including:

- Sound infrastructure delivery planning;
- Having no regulatory or national planning barriers to delivery;
- Delivery partners who are signed up to it; and
- Coherence with the strategies of neighbouring authorities.

The Core Strategy should also be flexible and able to be monitored. The Core Strategy should indicate who is to be responsible for making sure that the policies and proposals happen and when they will happen.

The plan should be flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals. Although it is important that policies are flexible, the Core Strategy should make clear that major changes may require a formal review including public consultation.

Any measures which the Council has included to make sure that targets are met should be clearly linked to an Annual Monitoring Report. This report must be produced each year by all local authorities and will show whether the Core Strategy needs amendment.

*c) Consistent with national policy*  
The Core Strategy should be consistent with national policy. Where there is a departure, the Council must provide clear and convincing reasoning to justify the approach. Conversely, you may feel that the Council should include a Core Strategy policy or policies which would depart from national or regional policy to some degree in order to meet a clearly identified and fully justified local need. In this instance it will be important for you to say in your representations what the local circumstances are which justify a different policy approach to that in national or regional policy, and support your assertion with evidence.
If you think the content of the Core Strategy is not sound because it does not include a policy where it should do, you should consider the following questions before making representation.

- Is the issue with which you are concerned already covered specifically by any national planning policy or in the Regional Spatial Strategy (or Sub-Regional Strategy)? If so, it does not need to be included.
- Is what you are concerned with covered by any other policies in the Core Strategy or in any DPD in the Council’s Local Development Framework (LDF). There is no need for repetition between documents in the LDF.
- If the policy is not covered elsewhere, in what way is the Core Strategy unsound without the policy?
- If the Core Strategy is unsound without the policy, what should the policy say?

Similarly, if you feel the Core Strategy includes a policy that you believe should not be included, you should consider the following questions in making your representation.

- Does the policy repeat or fail to expand upon existing national or regional planning policy?
- Does the policy contradict or misrepresent any of the supporting evidence?
- If the existing policy were to be removed, should it be replaced?

The Council considers that the Core Strategy: Pre-Submission Version satisfies all these tests of soundness and is the most appropriate strategy for the future development of Milton Keynes. However, if you consider the Core Strategy is unsound against one or more of the three tests of soundness (justified, effective, or consistent with national policy), you should identify which test(s) under Question 3.

General Advice
If you wish to make a representation seeking a change to the Core Strategy or part of the Core Strategy, you should make clear in what way the Core Strategy is not sound, having regard to the legal compliance check and three tests of soundness set out above. You should try to support your representation with evidence showing why the Core Strategy should be changed. It will be helpful if you also say precisely how you think the Core Strategy should be changed in Question 5.

Representations should cover succinctly all the information and supporting evidence necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further submissions based on the original representation you make. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Careful consideration should be given by those making a representation in deciding how the representation should be dealt with, i.e. by written representation or by exercising the right to be heard. Only where a change is sought to the Core Strategy is there a right for the representation to be heard at the hearing session. It is important to note that written and oral representations carry exactly the same weight and will be given equal consideration in the examination process. You can tell us if and why you consider it necessary to participate at the hearing session under Questions 6 and 7.

Where there are groups who share a common view on how they wish to see the Core Strategy changed, it would be very helpful for that group to send a single representation which represents the view, rather than for a large number of individuals to send in separate representations which repeat the same points. In such cases, the group should indicate how many people it is representing and how the representation has been authorised. All representations will be given equal weight. The published Core Strategy is intended to be the final version for submission to the Secretary of State. Therefore, raising new issues in representations at this stage which have not been raised during the DPD preparation and consultation process will not be helpful. Furthermore, the Inspector will not be able to make a change unless it relates to an issue which has been subject to the proper procedures of community involvement and sustainability appraisal. In the absence of clear evidence that such procedures have been carried
out, the Inspector will only be able to give limited consideration to such representations.

Representations may be accompanied (see Question 8) by a request to be notified at a specified address of any of the following:

a) that the Milton Keynes Core Strategy has been submitted for independent examination,
b) the publication of the Inspector’s Report, or
c) the adoption of the Core Strategy.

**Submitting Representations**
To avoid duplication of work, the Council requests that respondents do not send additional or duplicate copies of representations in more than one format (e.g. an electronic version and a hard copy). Please note that copies of all comments (including your personal details) will be made available for the public to view, and therefore **cannot be treated as confidential**. All representations should be made using the ‘Representation Form’ (or online version) to ensure the Council has all the information needed to process your comments. Please use a separate form for each individual representation you wish to make, to aid processing. All representations received will be acknowledged by post or email.

All forms must be received no later than **5pm on Wednesday 31st March 2010**

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**Useful Links**
Milton Keynes Council – Planning Policy homepage (for information regarding the Core Strategy and other documents within the Local Development Framework including the Statement of Community Involvement and Local Development Scheme) [http://www.miltonkeynes.gov.uk/planning-policy](http://www.miltonkeynes.gov.uk/planning-policy)


Department for Communities and Local Government – national planning policies (planning policy statements and guidance notes) which the Core Strategy must be in conformity with [http://www.communities.gov.uk/planningandbuilding/planning/planningpolicyguidance/](http://www.communities.gov.uk/planningandbuilding/planning/planningpolicyguidance/)

Government Office for the South East – regional planning policy, including the South East Plan [http://www.gos.gov.uk/gose/planning](http://www.gos.gov.uk/gose/planning)

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You can submit your representations online:
- by completing the representations form at [http://miltonkeynes-consult.limehouse.co.uk](http://miltonkeynes-consult.limehouse.co.uk), where you will also be able to print or save a copy for your own records*.

Or you can send completed forms to us:
- by email, to corestrategy@milton-keynes.gov.uk
- by fax, to 01908 252330
- by post, to
  - Development Plans Team
  - Milton Keynes Council
  - FREEPOST NATE 294
  - Spatial Planning
  - Civic Offices
  - 1 Saxon Gate East
  - Central Milton Keynes
  - MK9 3BR

* - If you have been involved in the earlier stages of the Core Strategy or have been contacted by the Council about the process in the past, you will already be registered on our Limehouse database, enabling you to respond online without registering again. If you have forgotten your password or username, you can contact the Development Plans team for a reminder.

If you have any questions, please contact us by email at development.plans@milton-keynes.gov.uk or by telephone on 01908 252599
Milton Keynes Council has reached the next stage in the preparation of its Core Strategy. Following several rounds of public consultation and gathering background evidence, the Council is now at the ‘pre-submission publication’ stage: the last opportunity for people to make comments on the ‘soundness’ and legality of the Core Strategy before it is examined by an independent Inspector.

What is the Core Strategy?
The Milton Keynes Core Strategy is a key part of the Local Development Framework that will replace the existing Milton Keynes Local Plan (which was adopted in 2005). The Core Strategy sets out the vision for the Borough in the year 2026 and how we are going to get there. It provides the objectives and strategy for the future development of the city and identifies the major areas where growth and change will take place. All future planning policies and documents within the Local Development Framework will be in accordance with the Core Strategy and help deliver its vision and principles.

What issues does the Core Strategy cover?
The key issues covered by the Core Strategy are set out below.

Growth
The scale of growth planned for MK is the highest for any city in the south east region outside London. There will be two new major development areas South East and South West of the city. We will need to work with neighbouring councils to make sure these areas function well as part of the city.

Sub-regional role
This will require new further education, shopping, entertainment, leisure and sports facilities, as well as more jobs, to serve the growing population not only in the city but also in the surrounding area.

Sustainability
The Core Strategy sets targets for reducing journeys to work by car, and increasing trips by walking, cycling and public transport. It includes ‘greener’ construction standards for new developments.

Diversity
MK’s population is changing, in terms of age groups and ethnic background. A wide range of housing will be needed – including more family homes and specialist housing for the elderly, as well as flats and other forms of housing for young and single people.

Skills
We need to improve education standards in MK, to attract more knowledge-based businesses that will offer opportunities for MK’s young people to stay here. This means investment in new and existing schools (including the new academy at Leadenhall and specialist secondary schools), and further education (the college and new university centre).

Connections
We need to improve connections with our local towns, and east-west connections – i.e. road (A421) and rail (East-West rail link) to link with the nearby growth areas of Aylesbury and Bedford, and further afield, to benefit from MK’s location at the heart of the Oxford to Cambridge Arc.
Regeneration
The older town centres of Bletchley and Wolverton, and some of the older ‘new town’ estates need investment, not only to improve the quality of the environment, but to improve the life chances of the people who live there.

Design
The city was founded on an innovative design-led process and this should continue in the next round of growth planned up to 2026.

The rural economy
This has suffered with closures in Newport Pagnell (Aston Martin) and Woburn Sands (Plysu/Nampak), but has benefited from growth in Olney town centre. We should continue to protect viable employment sites in the larger settlements in the countryside and we should maintain the success of the rural town centres into the future.

Infrastructure and delivery of services
The city has grown with major infrastructure (such as roads and schools) in place before developments have been completed (originally through the Development Corporation and later the New Towns Commission). This has continued in recent times through the innovative tariff arrangement with Milton Keynes Partnership and should continue in the next round of growth.

To read about our policies and approach to these issues in more detail, please have a look at the full Core Strategy: Pre-Submission Version on our website http://www.miltonkeynes.gov.uk/core-strategy-publication or you can look at a paper copy in any of the libraries in the Borough or at the Civic Offices. For details on how to comment on the Core Strategy: Pre-Submission version, look at ‘What should I do if I want to make comments’ below.
### MK 2031

**Consultation on draft:** November 2005 – January 2006  
**Consultation on strategy:** June – September 2006

The MK2031 work, led by Milton Keynes Partnership, was part of the evidence base for the Core Strategy. It explored the issues and options surrounding the location, scale, nature and delivery of growth.

Go to [http://www.miltonkeynespartnership.info/future_plans/MK_2031.php](http://www.miltonkeynespartnership.info/future_plans/MK_2031.php)

### Issues and Options

**Consultation:** December 2006 – March 2007

The Issues and Options document aimed to stimulate debate on what issues the Core Strategy should cover, set out some options for how those issues could be tackled, and gave the opportunity to raise new issues and possible options for how to address them.


### Preferred Options

**Consultation:** September - November 2007

This stage provided a formal opportunity for local communities and stakeholders to comment on the strategic policy direction the Council proposed on various issues. These policy directions took account of the responses people had made to the previous stages and our expanding evidence base and research.


### Pre-Submission Publication

**Consultation:** Wednesday 17th February – Wednesday 31st March 2010

This is the stage we are currently at, when we are publishing the Pre-Submission Version of the Core Strategy. At this time, consultees are only able to make representations on the ‘soundness’ and legality of the Core Strategy. See ‘Where are we now?’ and ‘What should I do if I want to make comments?’ for more details.

### Submission

**Expected:** May or June 2010

This is when we submit our Core Strategy to the Government, along with any supporting documents and any representations received during the Pre-Submission Publication stage.

### Examination

**Expected:** August 2010

An independent, Government-appointed Planning Inspector will lead an examination to check whether the Core Strategy has been prepared in compliance with the legal requirements and consider whether it is ‘sound’.

### Inspector’s Report

**Expected:** late 2010

Following the examination, the Inspector will produce a report with his or her recommendations and any changes that must be made in order to adopt the Core Strategy.

### Adoption

**Expected:** early 2011

If the Inspector finds it ‘sound’, we will adopt the Core Strategy and it will become part of the development plan for Milton Keynes.

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**Ongoing Evidence Gathering and Background Research**

Input from other plans and strategies – including the Sustainable Community Strategy and national, regional, sub-regional and local policies.
How has the Core Strategy been prepared?
The key stages in the preparation of the Core Strategy are set out below. Consultation was focused towards the beginning of the process (known as ‘front-loading’), when consultees could influence the developing strategy. During the ‘MK2031’, ‘Issues and Options’ and ‘Preferred Options’ stages, the community and other stakeholders were widely consulted on our proposals, and we received thousands of comments from hundreds of individuals and organisations. Alongside these main consultation stages, there has been ongoing research and evidence gathering. Using these consultation responses, our growing evidence base and a Sustainability Appraisal, we have developed the vision, objectives and policies in the Core Strategy. Milton Keynes Council believes that the Core Strategy contains the most sustainable and suitable plan for the future development of the Borough.

Where are we now?
As shown in the flow chart above, we are currently at the Pre-Submission Publication stage. For a six-week period between Wednesday 17th February and Wednesday 31st March 2010, the Core Strategy: Pre-Submission Version is available for the public and other stakeholders to comment on. Shortly after the end of this period, the Core Strategy plus relevant supporting documents and any comments received at this stage will be submitted to the Secretary of State in preparation for an independent examination. The comments received during this stage are considered by the Inspector and not by the Council. The purpose of the examination is to consider whether the strategy complies with legal requirements and is ‘sound’ and your comments should help the Inspector make his or her decision.
What should I do if I want to make comments?

If you wish to make comments or ‘representations’ on the Core Strategy: Pre-Submission Version, your comments must relate to the legal compliance of the Core Strategy, or the tests of soundness. The legal compliance of the Core Strategy relates to the way in which the document was prepared and whether the Council has met all the statutory requirements throughout the process. There are also three tests of soundness which the Inspector will consider the Core Strategy against. These tests are that the Core Strategy should be:

- **Justified** – based on robust evidence, and should be the most appropriate strategy compared to other reasonable alternatives;
- **Effective** – meaning it should be realistic and capable of being delivered, flexible enough to deal with changes in circumstances, and able to be monitored; and
- **Consistent with national policy** – meaning it should be in conformity with the Government’s planning policies.

These tests are explained in more detail in the ‘Guidance Note for Respondents’ which is available on our website http://www.miltonkeynes.gov.uk/core-strategy-publication and as part of the ‘Representation Form’.

You can view and download the Core Strategy: Pre-Submission Version online at http://www.miltonkeynes.gov.uk/core-strategy-publication or you can look at a hard copy in the Council’s Civic Offices or any of the libraries within the Borough.

All comments should be made using our ‘Representation Form’ to ensure we have all the required information for the Inspector to consider your comments. You should read the ‘Guidance Note for Respondents’ for more information before completing the ‘Representation Form’ to ensure you complete it correctly. The form and guidance notes are also available online, at the Civic Offices and libraries, and by contacting the Development Plans team.
All comments must be received before **5pm on Wednesday 31st March 2010.**

You can…

- complete the form **online** through our ‘Limehouse Consultation Portal’ at [http://miltonkeynes-consult.limehouse.co.uk](http://miltonkeynes-consult.limehouse.co.uk)
- **email** your completed form to us at [corestrategy@milton-keynes.gov.uk](mailto:corestrategy@milton-keynes.gov.uk)
- **fax it** to 01908 252330
- send it by **post** using our freepost address (no stamp needed) to
  
  Development Plans Team  
  Milton Keynes Council  
  FREEPOST NATE 294  
  Civic Offices  
  1 Saxon Gate East  
  Central Milton Keynes  
  MK9 3BR.

If you have any questions about the Core Strategy or the pre-submission publication stage which aren’t covered in the ‘Guidance Note for Respondents’, have a look at our website at [http://www.miltonkeynes.gov.uk/core-strategy](http://www.miltonkeynes.gov.uk/core-strategy), email us at development.plans@milton-keynes.gov.uk, or telephone us at 01908 252599.
15th February 2010

Dear Sir/Madam,

Milton Keynes Core Strategy: Pre-Submission Publication, February - March 2010

Milton Keynes Council has published its Core Strategy: Pre-Submission Version for a six-week period to allow comments to be made on the legality and soundness of the document. This publication period runs from Wednesday 17th February to 5pm on Wednesday 31st March 2010.

The Core Strategy is an important document, which forms part of the Council’s Local Development Framework. When adopted by the Council, it will set out the vision, objectives and strategy for the development of the Borough up to 2026. The Core Strategy will form the basis of all new planning policies that the Council will apply in future. For an introduction to the Core Strategy and how we have got to this stage, have a look at the enclosed Summary Leaflet.

We have enclosed a CD containing the document and the supporting documents. You will also be able to view the full Core Strategy: Pre-Submission Version and make and view comments online using our consultation system, Limehouse at: http://consultation.limehouse.co.uk/milton-keynes/.

You are already registered on the Limehouse system and your username is: xxx

To activate this account, we need you to either email or call us (using the contact details above) quoting the 6 digit reference number in the top right hand corner of this letter, and confirming your email address. A password will then be emailed to you enabling you to log-on to the system.

Alternatively, you can also respond on the enclosed Representation Form or complete an electronic version of the form and email it back to us at corestrategy@milton-keynes.gov.uk. The form is available at www.milton-keynes.gov.uk/core-strategy-publication. All written, emailed or faxed representations should be made on this form. This will ensure that the Council has all the information needed to process any representation you make. You can also photocopy this form, or get additional copies from the Development plans Team or from the libraries in the Borough.

If responding in writing, completed Representation Forms should be returned to the Development Plans Team using:

- our freepost address (no stamp needed): Development Plans Team, Milton Keynes Council, FREEPOST NATE 294, Planning, LUTS, Civic Offices, 1 Saxon Gate East, Central Milton Keynes, MK9 3HQ

- or fax to 01908 252330.

All comments on the Core Strategy: Pre-Submission Version must be received by the Development Plans Team no later than 5pm on Wednesday 31st March 2010.
Reference copies of the Core Strategy: Pre-Submission version, Sustainability Appraisal and other supporting documentation are available to view at the Council’s Civic Offices, 1 Saxon Gate East, Central Milton Keynes, MK9 3HQ during normal office hours (9.00 am to 5.15 pm, Monday to Friday).

All libraries within the Borough will also hold reference copies of the document and Sustainability Appraisal. The location and opening times of your nearest library can be found on our website at: http://www.milton-keynes.gov.uk/library%5Fservices/DisplayArticle.asp?ID=28715

The Council will summarise the main issues raised in all duly made comments after the 31st March 2010. The summary of issues will be submitted to the Government appointed Planning Inspector to consider as part of a public examination of the document later in 2010.

As a specific consultation body, we are required to write to your organisation when preparing Development plan Documents. If you feel, however, that you are not the best person for us to send correspondence to, please let us know and we will update our records.

If you have any questions regarding this letter, please do not hesitate to contact the Development Plans Team.

Yours faithfully

Bob Wilson
Development Plans Manager

Enc
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All comments on the Core Strategy: Pre-Submission Version must be received by the Development Plans Team **no later than 5pm on Wednesday 31\textsuperscript{st} March 2010**.

As well as being downloaded from our website ([www.milton-keynes.gov.uk/core-strategy-publication](http://www.milton-keynes.gov.uk/core-strategy-publication)), reference copies of the Core Strategy: Pre-Submission document, Sustainability Appraisal and other supporting documentation are available to view at the Council’s Civic Offices, 1 Saxon Gate East, Central Milton Keynes, MK9 3HQ **during normal office hours (9.00 am to 5.15 pm, Monday to Friday)**.
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The Council will summarise the main issues raised in all duly made comments after the 31st March 2010. The summary of issues will be submitted to a Government appointed Planning Inspector to consider as part of a public examination of the document later in 2010.

If you would like to be removed from our consultation database and not be made aware of any future consultations on planning policy documents, please let us know using the contact details above.

If you have any questions on this letter, please do not hesitate to contact the Development Plans Team.

Yours faithfully

Bob Wilson
Development Plans Manager

Enc.
The following list of documents was made available on the CD sent to all Specific Consultation Bodies and Town and Parish, and published on the Council’s website. It constitutes the background evidence base used in the preparation of the Core Strategy.
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<tr>
<td>NP12</td>
<td>Planning Policy Statement: Eco-Towns – A supplement to PPS1, Department of Communities and Local Government (2009).</td>
<td><a href="http://www.communities.gov.uk/planningandbuilding/planning/planningpolicyguidance/planningpolicystatements/planningpolicystatements/ppsecotowns/">link</a></td>
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**Other Relevant National Level Policy and Guidance**

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**Regional Documents**

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<td>SR2</td>
<td>Milton Keynes and South Midlands Study, Roger Tym &amp; Partners (2002).</td>
<td>Available for viewing in hard copy only</td>
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**Local Policy**

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**Studies, Assessments, Technical Information and Background Documents**

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<td>B23</td>
<td>Milton Keynes Local Housing Assessment 2007, Milton Keynes Council (2007)</td>
<td><a href="http://www.miltonkeynes.gov.uk/housing-strategy/documents/Housing%5FNeeds%5FStudy%5FYear%5F2%5F%5Ffinal%5Freport%5F2Epdf">http://www.miltonkeynes.gov.uk/housing-strategy/documents/Housing%5FNeeds%5FStudy%5FYear%5F2%5F%5Ffinal%5Freport%5F2Epdf</a></td>
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<td>B54</td>
<td>The Plan for Milton Keynes, Milton Keynes Development Corporation (1970).</td>
<td>Available for viewing in hard copy only</td>
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<td>B55</td>
<td>Milton Keynes Neighbourhood Regeneration Strategy, Milton Keynes Council (2008).</td>
<td><a href="http://www.miltonkeynes.gov.uk/regeneration/documents/regeneration%5Ffinal%5Fflow%5Fres%5F9%5FApr%282%29%2Epdf">http://www.miltonkeynes.gov.uk/regeneration/documents/regeneration%5Ffinal%5Fflow%5Fres%5F9%5FApr%282%29%2Epdf</a></td>
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<td>B83</td>
<td>Young Persons Housing Strategy 2007-2010, Milton Keynes Council (2006).</td>
<td><a href="http://www.miltonkeynes.gov.uk/housing-strategy/documents/Young%5FPersons%27%5FHousing%5FStrategy%5F2007%2D%5F2010%5FApproved%5Fby%5FCabinet%5F2007%5FDraft%5FPDF.pdf">http://www.miltonkeynes.gov.uk/housing-strategy/documents/Young%5FPersons%27%5FHousing%5FStrategy%5F2007%2D%5F2010%5FApproved%5Fby%5FCabinet%5F2007%5FDraft%5FPDF.pdf</a></td>
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**Site/Scheme/Area Specific Information/Policy**

<p>| SS3 | Bletchley Regeneration Study, EDAW (1999). | Available for viewing in hard copy only |</p>
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**Monitoring Information**

This summary forms the first part of the Regulation 30(1)(e) statement

620 responses were received during the publication period, from 140 separate organisations or individuals.

- Bullet points are generally statements made from the point of view of the respondent, as a summary of their response. Similar or related comments have been grouped where appropriate.
- This is a summary of all the main points raised by the respondents. Where a point has been made several times, it has been highlighted in italics.
- Some points could be relevant under more than one topic area, but they have been included where it is deemed most appropriate.

Growth Strategy general, including flexibility in delivery

- Support for the settlement hierarchy. Others state that CMK should be referred to as the top of the settlement hierarchy.
- Approach of only proposing to allocate and deliver one additional expansion area (SESDA) is unsound. Too much reliance has been placed on the SESDA, creating an inflexible strategy. Should have a greater choice of sites to encourage delivery, for example, additional, modest expansion areas of between 500-1,000 dwellings adjacent to the city. Should allocated further Strategic Reserves to allow for future flexibility.
- Core Strategy should have inherent flexibility to meet new opportunities. Respondent promotes development on the western flank where a new urban extension can be brought forward incorporating a new sports initiative of regional and national significance.
- Just because planning permission has been granted on a site, doesn’t mean it is ‘committed’ or will actually come forward. Consideration should be given to why permitted sites haven’t come forward yet, and reassess them where appropriate.
- Document preparation has been an inflexible process, as existing allocations have not been re-tested.
- Growth rates - concern that an annual building rate of 2,500 completions cannot be achieved; the proposed growth is based on unachievable build rates that haven’t been met even in times of economic growth. Others state that we should be achieving higher build rates (double those proposed) to fully reflect the actual housing need in line with the Barker Review.
- Growth rates referred to in paragraph 2.2/2.3 are inconsistent (PSP373 and 374).
- Reference should be made to extant planning permissions and adopted SPDs/SPGs.
- Document should state that additional development sites may come forward through the Site Allocations DPD.
- Support for development in the most sustainable locations, i.e. on and adjacent to the existing Milton Keynes urban area, especially CMK.
- Existing allocations could be reviewed or re-prioritised if alternative, unallocated sites are found to be more suitable or sustainable.
- Support for identification of development sites (including rural housing sites) through the Site Allocations DPD.
- Housing figures show a shortfall in the 5 year housing supply. No mention of what will be done if the trajectory falls below the 20% range.
- Concern that the timescales in Policy CS2 will become out of date by the time the Site Allocations DPD is adopted. The policy should extend beyond 2026 to ensure the SA DPD has 15 years of supply identified.
- Policy CS2 should make reference to the SHLAA.
- Policy CS10 should consider how economic circumstances can affect the delivery of a site and allow flexibility for sites with significant abnormal costs.
− Not sufficiently clear which body will be responsible for the overall delivery of the strategy.
− Should explore new approaches to delivery and management which would give greater efficiencies.
− Should add more discussion of potential obstacles and long term challenges to delivery and what MKP/HCA are doing to overcome them.
− Core Strategy should be altered to including more specific reference to the opportunity for northward expansion from Milton Keynes and westward expansion from Newport Pagnell.

Development Timeline and Trajectory
− Timeline unnecessarily holds back land supply that can make a positive contribution to achieving housing targets. Timeline and trajectory should permit early release of land in the SESDA if necessary. Phased delivery of SESDA should be determined on the ability to deliver supporting infrastructure, not local authority boundaries.
− Trajectory is inflexible and undeliverable in terms of timing of delivery. Also shows a short term problem of housing supply that MKC is not taking action to rectify. More innovative action is required.
− No basis for splitting schedule into 5 year tranches – inconsistent with the RSS.
− Support commitment to adopting an SPD for the SESDA by 2011, but should acknowledge this is the start point for beginning the first phase of development of the SESDA, and there is no justification to delay development until after 2016. The 2006-2011 schedule should state the SESDA masterplan will be adopted (as has been proposed for 2011).
− 2011-2016 schedule should include commencement of development in SWSDA, and 2016-2021 should show development continuing, rather than starting.

Rural Housing/Rural Strategy
− Development in the rural areas should be given greater emphasis. Document is too focussed on the city. Emphasis on city expansion is ineffective in dealing with rural housing needs.
− Support for rural housing development of around 120 homes a year. Others question the justification for the rural housing figure – just based on past completion rates – and suggest it should be increased for the rural area to make a greater contribution to support the rural strategy and the hierarchy for rural areas.
− Some support for the rural settlement hierarchy, including specific support the classification of various settlements.
− Others object to rural settlement hierarchy. No specific assessment has been undertaken to justify the rural settlement hierarchy. Rural sites should be allocated according to their sustainability. Rural hierarchy is inconsistent with this. Other villages outside the key settlements and selected villages should be considered for development, to support community diversity and village services. Should remove Selected Village status and use housing land supply information and local assessments of housing need to inform future allocations, which will provide a more flexible framework.
− Limiting development in the rural areas does not appropriately consider the strategy of delivering rural housing to meet local needs.
− Concern that no details are given for how development sites in selected villages will be prioritised. Should set out where new housing provision should be accommodated in strategic terms post 2011.
− Support for inclusion of Sherington as a Selected Village, as a village with a range of services and facilities and suitable for some development. Others state that the indicated figure of 20-40 dwellings is unsound and unjustified, and should not be treated as a maximum without more detailed assessment. Development should be subject to full community involvement and consultation and respect the principles of design, environment and context contained in the Village Appraisal. Others object to inclusion of Sherington as no national policy exists to justify designating a village for development because of Parish Council support.
− Support for Newport Pagnell as a key settlement to accommodate future development. Several comment that NP should provide the majority of housing provision in the rural area. Others state that given Newport Pagnell’s relationship with Milton Keynes it should be regarded as part of Milton Keynes and therefore should contribute towards the development requirements of the city.
As Woburn Sands will already get growth through the SESDA, it shouldn’t be a focus for further rural housing growth. Should resist significant increases in the amount of housing in or adjacent to Wavendon, Woburn Sands and Aspley Guise. Others support the recognition of Woburn Sands as a key settlement.

Support for Olney as a key settlement.

Support for Hanslope as a Selected Village.

Should consider some development in Haversham.

No reason why village development boundaries cannot be changed through the Core Strategy or Site Allocations process. Unclear whether a boundary review will take place – should be specific.

It is against the interest of existing rural settlements to have high density housing imposed on them, which would destroy their character and history.

Support for the recognition of traffic congestion in the rural areas that feed the grid system.

Core Strategy does not reflect the most up to date documents regarding the rural economy and community.

**Sustainability**

Lack of evidence or justification to require the SDAs to meet eco-towns standards. Similarly, lack of evidence or justification for new homes having to meet higher than the national minimum standards for sustainable construction.

Sustainability of existing building is as important as construction of new homes. Should look to make improvements to the existing building stock.

The source of the Parks Trust/CO₂ pollution statistic is erroneous.

Objectives should refer to the Low Carbon Living Project and reference should be made to the initiatives of the project in Chapter 12.

There should be a flexible approach to sustainability principles.

Should define home-based working.

Shouldn’t delay moving to Code for Sustainable Homes Level 6 if MKC is truly interested in housing innovation. Others object to exceeding national standards on the basis that it pre-empts the application of national standards through Building Regulations, and will result in a sporadic and uncoordinated roll-out of standards, and could jeopardise the viability and delivery of development, particularly within the SDA.

Should consider the impact that green engineering will have on car emissions, and the contribution this will have in the future to our carbon footprint.

As the population grows, carbon emissions from cars will also increase, at a greater rate to reflect increases in car use. The Core Strategy proposals to little to deal with this and conflict with the Climate Change Act and Road Reduction Act. The Core Strategy should take a new direction that will contribute to significantly reducing Milton Keynes’ transport carbon footprint.

Objection to unsubstantiated statement that there are significant opportunities in the SDAs for an area wide approach to low or zero carbon development.

Policy CS14 should set out the baseline against which development is expected to achieve any reduction.

Carbon Offset Fund contribution does not comply with Circular 05/2005 guidance.

Concern about the implications of Policy CS15 that will seek to promote the use of Community Energy Networks – should concentrate on the delivery of appropriate levels of sustainable construction and not be distracted by Community Energy Networks which would have significant financial implications. Requirement for developments over 200 dwellings to include CEN is arbitrary, excessive and not supported by the evidence base.

Support the objective of achieving more sustainable design, but essential the measures are technically feasible and financially viable. Policy CS14 should allow flexibility as well as cost reduction measures if the policy requirement is applied (PSP03). Should not place an undue additional burden on developers through unreasonable requirements.
South East Strategic Development Area (SESDA)

- Support stated for the allocation of the SESDA, and for the preparation of a Development Framework. Others object to the need to produce a development brief for each phase/site of the SESDA which would add delay – it should be done under a single Development Framework.

- Central Bedfordshire housing numbers in the SESDA are for the East of England Plan to determine, and shouldn’t be pre-empted through this document. Others state that because of the issue of reconciling the differences in the SESDA between the Mid Bedfordshire Core Strategy and the SEP, and the inherent constraints in the SESDA (e.g. EW rail route and level crossing) that an alternative, more deliverable site within Milton Keynes should be allocated instead.

- Most up-to-date planning status and policy position of all parts of the SESDA should be stated.

- The role of the SRAs in the SESDA figures should be clarified. Are the SRAs included as part of the SDA, or separate from it? SESDA should be treated as a comprehensive area, but the residential components of the SDA and SRAs should be explained separately. Others state there is no logic in considering the SRAs separately from the rest of the SESDA when they will be part of a comprehensive, single area, with no distinction between the areas through the development framework.

- There has been an unjustified increase in the numbers in the SESDA due to the way the SRAs have been added, which has not been consulted upon. SRAs were not allocated in the Local Plan as housing sites – they were just identified with potential for unspecified development.

- Support the safeguarding of an M1 junction and crossing provision. Others state there is no justification, evidence or consultation on a future motorway bridge and/or new Junction 13a – it would cross into Central Bedfordshire and is therefore outside the region and authority area, over which MKC has no control, and which could create a precedent for development to the east of the M1.

- Concern that the SESDA proposals go against the content of the other Core Strategy policies (PSP430), and also that the Core Strategy goes into too much detail which should be left for the development framework to determine.

- The Site Allocations DPD should not relate to the SESDA as it would delay delivery, and will be covered by the Development Framework.

- Emphasises the urgent need for progress to be made on the development framework for the SESDA.

- Should give more flexibility to delivery of the SESDA timescales.

- Development in the SESDA around the villages must be sympathetic, and not repeat any mistakes made in the previous development in this area. Concern that there is insufficient reference to the character, sensitivities and needs of existing areas in and adjoining the SESDA. The visual impact and landscape character should be considered in the Core Strategy, and the need to ensure protection and enhancement of historic assets.

- SESDA figures should not be treated as a maximum – the form and mix of development should be flexible to reflect what is needed at the time.

- No assessment has been prepared of the viability of delivering 7,300 homes in the SESDA, while respecting the rural areas, existing settlements, and allowing land take for grid roads and other facilities.

- Impact on the road infrastructure is not adequately considered.

- Some of the principles and requirements of development are not supported by the evidence base and would delay implementation of the SESDA.

- Constraints (including the route of the BMK waterway) and the GI network should be identified in the Core Strategy to establish principles for the development framework. BMK waterway route under the A421 and onward to the M1 needs to be identified and protected.

- Discrete areas of the SESDA could be brought forward before 2016, using existing infrastructure.

- Concern over allocation of housing to the east of Magna Park, in close proximity to employment uses would place constraints on the occupiers.

- A landscape buffer at Cross End would help develop the SESDA in a sensitive manner.

- Wavendon Lodge should be included as integral to the SESDA.

- Support for Wavendon Tower to be included within the SDA.
– Wavendon Gateway site should be identified as being available for immediate release. Similarly, others state that there is a clear basis for separating out Glebe Farm and Eagle Farm for early release.

**South West Strategic Development Area (SWSDA)**
– *Salden Chase should be considered as a separate settlement, not simply as part of Milton Keynes.*
– *Essential to set out the process and timescale for assessing the options for longer term growth of the city. Policy allows for further growth of the SDA, but this pre-empts work on future growth options, and contradicts assurances given by MKC, AVDC and BCC that the SWSDA will have long-term, defensible boundaries to prevent further expansion. Clarification should be given as to the future development beyond the SWSDA, including timescales.* Statement that SWSDA should have a defensible western boundary to prevent further growth.
– Road links within the SWSDA – a new road linking the A421 and the A4146 is proposed in the Core Strategy, but proposal plans for the SWSDA only show it as a possible link. *The route should be agreed upon and fixed now,* together with a statement on how the road will be funded. Road should be constructed at the same time as the early phases of the development. Others question the status and regional/sub-regional significance of the road (PSP309).
– Should identify the need for development around the SWSDA to enable community and environmental enhancements to ease the transition from urban Milton Keynes into rural Bucks.
– SWSDA should be included in Policy CS2 to ensure that cross-boundary working takes place.
– Table 5.7 should refer to figures of 5,390 homes, not 5,400 for the SWSDA.
– References to SWSDA should be replaced by North East Aylesbury Vale.
– More details are needed on the impacts of development on urban Milton Keynes and rural Aylesbury Vale. *A timetable is required for the work to identify these impacts.*
– Framework for the SWSDA should be succinct to avoid becoming quickly out of date. Will need close joint working across boundaries, including considering infrastructure needs.
– Inappropriate to have a position statement relating to a neighbouring emerging Core Strategy. Also statement regarding AVDC Core Strategy is already overtaken by events.
– SWSDA will take infrastructure development resources away from other AVDC areas.
– List of issues is too detailed, and lacks evidence.
– SWSDA is not large enough to meet infrastructure needs, and reasonable alternative sites should be consulted upon. MKC has already expressed concern over capacity of site, so unrealistic to then also propose a regionally significant sports facility for the site in addition.
– No reference to the impact of development at the SWSDA on the nearby villages. Should refer to providing traffic calming measures for rural areas near to SWSDA, to reduce impact of rat-running.
– Premature to suggest a layout prior to the necessary technical works.
– What impact would there be on the design of the SWSDA if the new EW rail station does not go ahead. Also question the need for a new station when fast bus links will be the main public transport solution.
– SWSDA relies on unrealistic timescales and build out rates. Cross boundary arrangements will impede the timely delivery of the appropriate scale of growth.

**SDAs general**
– Core Strategy is not the appropriate vehicle to promote a particular access/design concept into the SDAs (e.g. grid roads).
– *Premature to prescribe outcomes in advance of the Development Framework/SPDs.*

**Cross-boundary Delivery**
– Insufficient detail of how service delivery across boundaries will be dealt with as a threat.
– SWOT analysis should include the opportunity to change political boundaries in advance of development. Altering the boundaries as a pre-requisite would be a more efficient way forward.
– *Ensure that all relevant authorities involved in joint working are listed (i.e. correct the exclusion of Buckinghamshire County Council and Aylesbury Vale Advantage in various places).*
− Needs recognition of the number of agencies involved in bringing forward the SWSDA.

**Planning for areas outside MKC’s control**
− Cannot plan for areas outside of MKC’s control, including proposals to extend grid roads, or linear parks/green infrastructure.
− Lack of clarification on how a consistent approach to the SDAs will be achieved across different planning authorities. Also, that there should be different approaches reflecting the different role and functions of the two SDAs, and their character and delivery mechanisms. Others suggest that the authority boundaries should be altered before development of the SDAs to ensure a consistent approach to the areas.
− Milton Keynes is different to the rest of MKSM but the document and the delivery plans must be compatible with those of other authorities and agencies.

**Housing figures**
− Unclear what ‘urban housing’ requirement is referring to as not referenced in the RSS, which includes SDA areas within its figure. Also unclear which existing urban area sites with planning permission are included in the 19,900 in Policy CS2.
− Differences between MKAV2 housing figures and those in Table 4.1 should be explained and clarified.
− Concern over general level of continued growth and the lack of local support for it.
− Reference to housing figures as a maximum should be removed.

**Transport and traffic**
− No robust justification or evidence to support the proposal to extend the grid road network into the SDAs. No evidence given as to the benefits of the grid system.
− Concern about reference to M1 J13a as there is no basis for the scheme in the HA’s Road Programme. The new J13 has been designed to such a standard as to be able to accommodate future growth requirements. Provision of a possible J13a to the immediate south of Brooklands could create a noise and/or air quality window that would materially harm the residential amenity of future residents of this area.
− The Core Strategy should focus on cars on existing grid roads, rather than on fringe issues of public transport or extensions to grid roads. Others are concerned that the Core Strategy is too car-centric. Pursuing car-orientation is discriminatory to non-car owners. While Milton Keynes has ‘easy movement’ for the few, the majority rely on a virtual ‘rural level’ of public transport services, which the Core Strategy makes no attempt to address. It is unjustifiable to attempt to impose a grid layout that promotes car use over more sustainable forms of transport.
− Ambitions for travel and transport around the city do not pay sufficient attention to DfTs ‘Developing a Sustainable Transport Strategy’ or ‘Active Travel Strategy’.
− Core Strategy should be supported by a Delivery Plan that shows how the transport measures necessary to support growth will be delivered.
− Core Strategy should focus on policies and measures that minimise the growth in traffic and manage growth to safeguard the operation of the strategic road network
− Reducing car dependence through public transport improvements should be for all journeys, not just journeys to work.
− No reference made to the need for sustainable transport links with the rest of the Borough – linkages between the city and its rural hinterlands are necessary to promote sustainable communities.
− Reasons for poor bus usage are more complex than stated in paragraph 2.9.
− What evidence is there to link the switch of journeys from car to public transport, to regeneration of the city.
− Claim in the SWOT analysis that investment in public transport and careful design of new areas will reduce car usage is at odds with the rest of the document which assumes that car usage will increase.
− No reference to transport issues on a sub-regional level – fails to look outside the Milton Keynes boundary.
- Target to reduce congestion and encourage low carbon transport in the Vision is very precise, and unclear as to how it is defined/measured.
- Welcome reference to the improvements in transport infrastructure (especially A421 and promotion of EW rail link) in the Vision.
- Reference to the Aylesbury spur of the EW rail link is omitted.
- A Park and Ride facility should be located north of the A421 in the SEDA as to the south it would overload small roads. Others state that a P&R in the SE should be located immediately west of M1 J13 to allow for interchange between car, bus and rail. No justification for a P&R facility on the A421 corridor in relation to the SEDA in AVDC – would be more appropriate in Milton Keynes.
- Concern about increased traffic on A421 west of Milton Keynes and the need for dualling/traffic flow improvements to be considered.
- No evidence to support the need for a link road between the A421 and A4146.
- Transport section fails to provide policies to deal with the predicted extra transport demand from the expansion of Milton Keynes and fails to take into account the changes necessary to cope with climate change and peak oil.
- What assumptions have been made/used in the traffic model? In paragraph 2.10, when does the 25% increase in capacity date from?
- Core Strategy will constrain the more detailed transport policies that will emerge in LTP3. Core Strategy proposes a transport strategy different to the SITS approach but without explanation.
- Inconsistency between ‘end-state’ modal splits from various Council policy documents. Core Strategy does not conform with other internal Milton Keynes policies (PSP609).
- The Core Strategy does not explain how the transport network would be able to cope with all the extra people travelling to the extra jobs, approximately double in CMK.
- Misleading to say car use will remain significant due to the design of Milton Keynes – it is due to various reasons, including increasing in line with prosperity.
- Future parking management in CMK funds should be ring-fenced for public transport or other transport improvements.
- Should recognise that settlements being served by buses is not the same as destinations being served – for example the hospital, or a major employer.
- Transport section lacks reference to support the delivery of EW rail and the need to improve road connections between Aylesbury and Milton Keynes. Should strengthen the case for EW rail link by referring to it as being a catalyst to development, improving public transport and supporting economic development.
- Could provide further detail on the Redway network as an important asset and explore ways in which it can be developed and/or expanded in the future to provide a safe and effective network to serve Milton Keynes and the growth areas.
- Acknowledge more specifically the transport work being undertaken within MKSM and how proposed sub-regional transport improvements may influence the Core Strategy.
- With the transport modelling behind the Core Strategy unavailable, it is clear transport policy proposals are untested and there is a lack of evidence that they are achievable.
- Core Strategy is led by housing and employment projections which have been related to a specific set of spatial development proposals, but without a parallel set of transport proposals that give confidence that the spatial proposals can be made to work in terms of movement and particularly travel to work.
- Current transport plans do not address how the transport challenges of Milton Keynes will be resolved, detailing only a minor modal shift to public transport. A more effective policy would include a mass-transit system, by-passes for villages to Milton Keynes, additional M1 north Milton Keynes junction and NP bypass, and a flyover at M1 J14 to improve traffic flow.
Employment and Economy

- **Support for 1:1.5 target**, and the recognition that there is enough land for 1:1.5 jobs. Others object to the 1:1.5 jobs target as it will increase out-commuting from neighbouring areas and has potential to undermine the economic growth of other MKSM towns.
- Table 5.2 should reflect the 1:1.5 ratio and the South East Plan.
- Importance of closely monitoring performance against the 1:1.5 jobs target.
- Support for aspiration for the Science and Innovation Habitat in the Vision.
- **Need to be clear about the breakdown of jobs figures for the SE and SW SDAs, which should be separated from each other and into authority areas. SDA employment uses will need further assessment as part of the emerging development frameworks** - the employment figures in the GVA Study were only preliminary.
- How many jobs are to be provided in the Central Bedfordshire part of the SESDA? Any employment numbers for the Central Bedfordshire part of the SESDA should be determined by the East of England Plan and adopted through their LDF.
- **Too much focus on the knowledge economy to the detriment of other sectors**, including logistics and distribution, which is not underpinned by a robust evidence base. The Core Strategy should reflect the importance of the logistics sector and Milton Keynes’ ideal location to meet the sector’s needs. De-selection of logistics and distribution sites could have implications for the economic aspirations of neighbouring authorities.
- Too much aspiration and not enough evidence and robust policy, and no effective delivery mechanism.
- **While some support is shown for re-evaluation of employment sites, others state there is no justification provided to justify re-allocation.** Re-allocating fringe sites to B1 uses would position them in peripheral locations against the policy to have such uses in CMK (Policy CS7): CMK should be the focus.
- Flexibility in re-allocating employment sites will help keep pace with demand and provide attractive investment options to the market.
- Increasing office development in CMK will worsen congestion in the central area. Should use the original plan of widely distributed employment.
- Employment figures for the SWSDA are out of date. Also, Salden Chase should not be treated as a strategic allocation – it should just serve its own residents. Strategic employment should be within Milton Keynes if it is intended to serve Milton Keynes residents.
- Economic development policies are not based on actual recent performance of the local economy, and lacks any delivery mechanism.
- Continuing to deliver job growth are the proposed levels will rely on intervention at regional level as well as local investment – this should be reflected in the delivery section for Policy CS3.
- Mismatch between the Core Strategy policies and the proposed employment uses for different areas, and what is permitted (PSP42).
- Employment land allocations should be strategic if they are to be in the Core Strategy – the allocations in Policy CS3 should be in the Site Allocations DPD.
- Employment ‘allocation’ of B1 use for Olney is too prescriptive.
- Live/work units are not defined in the Core Strategy, and are generally complex and expensive to deliver.
- Too much reliance on UCMK for economic growth.

Education, University and Skills

- Without appropriate attention and investment at the primary and secondary educational levels, boosting the tertiary level will not give the high returns that are anticipated.
- Welcome the prominence given to the aspiration for a university. Endorse the plans for the development of higher education locally.
- Welcome flexibility to planning CMK to accommodate development related to the university.
– Children from the SWSDA will be eligible to take local grammar school places, to the detriment of local children in Buckingham.

Central Milton Keynes (CMK)
– Insufficient thought and space given to public transport provision and how public and private transport will be provided for to support proposed doubling of employment in the city.
– Should say that buildings will be re-used (including iconic buildings) where possible when deemed obsolete.
– Building on car parks will create significant challenges to vendors; need to retain adequate car parking in the centre. Ensure the policy is in line with the desire for reduced congestion.
– No assessment to demonstrate that the capacity of roads can be made sufficient to provide for public and private transport to serve city wide travel to work, or the impact on the city centre of increasing road capacity.
– Should clarify CMK’s role as regional, not a sub-regional centre.
– Unclear how the CMK objectives in Policy CS7 could be used to assess development proposals. Policy CS7 does not provide clear guidance to assist developers or landowners when bringing forward land for development.
– Policy CS7 should identify potential housing sites in CMK.
– Quantum of dwellings to be provided in CMK is unlikely to be achieved.
– Support for additional comparison floorspace in the Primary Shopping Area, and the objectives for CMK.
– Core Strategy should state the proposed future status of the CMK development framework SPG.

Other Areas of Change
– Need to ensure that development in other areas of change contribute to the delivery of wider strategic objectives. Wider strategic objectives should be given more emphasis than those in Policy CS8 when assessing site suitability.
– Need a coherent strategy for the Points of Connection in the city’s grid network to ensure sustainable development is achieved and the transport system develops to help support it.
– Support for protecting sites allocated in the Local Plan.

Retail
– Retail section and floorspaces indicated are overly prescriptive and inflexible. Floorspace levels are not supported by the evidence base. No evidence given for the size of the food store required in the SDAs.
– Additional convenience floorspace should be developed through increases and extensions to existing facilities in the town centre, as per the sequential test. Beyond that, further retail development should be identified if necessary, in designated local centres.
– Strategy to have a regional focus on CMK should not be compromised by regeneration and expansion of other district centres – out of centre development could have a significant impact on CMK.
– Town centre should be the focus for leisure and entertainment uses. Out of centre locations have the potential for negative cumulative impacts.
– Overlooks additional capacity from the SRAs which were not considered in the retail study.
– Policy CS4 does not reflect the special role of the stadium for retail and leisure requirements. Others state that the stadium is not part of the retail hierarchy, so commercial, leisure, retail and entertainment uses should not be focussed there, and no further need for development has been identified.
– The wording of Policy CS4 is too simplistic and doesn’t consider the other issues that should be considered outside the floorspace requirements.
– Primary Shopping Area should be clearly stated in Policy CS4.
– Because of the economic uncertainty during the modelling, the Core Strategy should specify that an early review of the study should be undertaken and figures should be used cautiously.
– Confusing references to CMK being either a regional or sub-regional centre.
– The hierarchy of local and village centres is not set out, including how the new centres in the EAs and SDAs are to be classified. There is a possible need for an additional classification between the local and district centre levels.
– Retail Capacity and Leisure Study is insufficiently fine-grained to provide an assessment of the needs of individual areas within the borough – study masks areas that are either underprovided for, or over-provided for in terms of main food shops.

Regionally important/significant sports facilities
– Supported, including seeking opportunities for hosting national or international events. Could also provide an economic and cultural stimulus for the future. Others question the need for such a facility.
– No analysis of the nature of the facility required, where it is to be located, who will deliver it and its viability.
– Misinterpretation of the SEP Policy TSR3 – the sports facility could be within Aylesbury Vale, not just in Milton Keynes (PSP483, 550).
– Need assessment of the nature of the proposed regional sports facility to understand the impact on the delivery of land for housing etc in the SDAs.
– A regional sports facility should not be part of the SESDA policy while also identified for the SWSDA, when the SEP doesn’t specify where such a facility should be located, and what type.
– Concern at safeguarding land in the SDAs for a sports facility which would be better located in a city centre location. Locating it in a SDA would promote car use and require a parking area that would be better used for homes and other community facilities. Further concern if the facility is to accommodate spectator sports.

Developer Contributions
– Fail to take account of the fact that CIL regulations will prevent the pooling approach of the Milton Keynes tariff, or the potential for a shortfall in tariff funding.
– Issues over reference to the Tariff in Policy CS5: reference should be made to CIL/S106, or other arrangements; why is EW rail specifically mentioned and not other infrastructure; and the strength of the causal link between the SESDA and the infrastructure items required (PSP225).
– Concern about the requirement for a contribution to EW rail despite uncertainty in delivery and the cost of the proposal, and that it is not a reasonable requirement in terms of Circular 05/2005. Developer contributions for a new railway station for EW rail link would not be reasonable. Others welcome the support and requirement for contributions for EW rail.
– Core Strategy should be looking towards CIL and have a policy on which to hang the CIL charging schedule.
– Ensure that developer contributions relate to existing deficiencies related to development proposals.
– New tariff needed quickly to avoid threats to delivery of SDA, but complexities should not be underestimated.
– Should mention Circular 05/2005 in relation to developer contributions.
– Use of standard formulae for planning obligations is unsound as does not reflect different requirements of sites with higher or lower infrastructure costs, and not consistent with Circular 05/2005.
– Existing tariff figure is inadequate given that costs have escalated.

Sites supported through representations
– Tickford Fields site (PSP60, 65) as a Rural Expansion Area.
– Shenley Dens site proposed for 500-1,000 dwellings.
– Lavente Gate, as a third SDA or as a reserve option. Would link to the regeneration of the Lakes Estate and Bletchley.
– Woodleys Farm and Paddocks Lane, which would aid delivery of EW rail, and less constrained alternative to SESDA.
- Bellow Hill, Bow Brickhill.
- Wavendon Lodge should be included as integral to the SESDA.
- Land at the Western Expansion Area (see PSP435).

**Housing - design, types, tenure, affordable housing**
- Should pursue higher density to reduce costs per dwelling and achieve greater affordability, and make local facilities more viable and sustainable, and reduce the need for car use.
- The reasons for some of the existing, older estates being in a poor condition is more complex than it simply being down to bad design.
- The importance of ‘place making’ should be stated as part of Objective 11.
- HiMOS should be built as part of new developments – not as conversions.
- There is a potential reliance on flats to meet housing targets.
- *Unsound to rely on an SPD to direct the Core Strategy on affordable housing – should be set in a DPD, a specific affordable housing policy within the Core Strategy. Also needs evidence/viability assessment.*
- No discussion of tenure of housing and insufficient consideration of affordability.
- Should summarise housing figures in Section 10 for clarity.
- Should consider internal dwelling size standards as room sizes have become unacceptable.
- Affordable housing requirement should be standard across the whole of the growth area, with no differentiation between the two SDAs.
- Not clear what the housing needs are for the SWSDA and no mention made of the Buck SHMA or the AVDC Affordable Housing Viability Study.
- High quality, well designed places are encouraged, however not all such places need to be contemporary, innovative or offer exemplary architecture.
- Should make reference to the specific requirements of emergency services being taken into account in the design and location of new development.
- Should have a commitment to contributing to the regional density target of 40dph.

**Infrastructure (social, green, utilities...)**
- Ignores the potential to extend green infrastructure through development beyond and outside of the identified SDAs.
- Social and infrastructure facilities should be identified to help Milton Keynes grow and fulfil its sub-regional role.
- Support for promoting infrastructure planning, but Objective 16 should make reference to the range of funding sources potentially available and the important role of other infrastructure providers.
- Should acknowledge infrastructure that must be provided as part of the SDAs/growth. Could prepare an infrastructure delivery plan.
- Core Strategy should be more effective in ensuring that utilities infrastructure does not damage the green landscape.
- Further work is required with the relevant service providers to identify and cost infrastructure requirements beyond the time horizon of the LIP.
- Future funding availability is uncertain. In addition to making reference to funding sources, should also have flexibility to allow for different solutions/models of delivery to emerge.

**Biodiversity, Green Infrastructure, Landscape Character**
- References to conserving biodiversity should also state that it will be enhanced, in line with PPS9 and Policy NRM5 of the SEP. Biodiversity should be stated as a feature of multi-functional green infrastructure.
- Updates are suggested regarding SSSIs, Local Wildlife Sites and the UK Biodiversity Action Plan.
- Request that the four areas of regional importance for biodiversity action plan priority habitats are stated.
− Mitigation hierarchy is not clear - mitigation should be used where there is no reasonable option for a development that will have a negative impact on biodiversity. If mitigation is not possible, then compensation measures should be sought.
− The impact of growth must be considered in balance with the strategic planning objective of sustainable growth. Development that will extend beyond the existing settlement boundaries should protect and enhance the character of the local landscape or historic environment. SA DPD should contain a transparent site assessment methodology.
− Add reference to supporting biodiversity recording and monitoring, especially the work of the Buckinghamshire and Milton Keynes Environmental Records Centre.
− Should state that the DM DPD will identify nationally, regionally and locally designated biodiversity sites and Biodiversity Opportunity Areas.

Heritage Assets
− Protection of historical artefacts should be added to the wording of Chapter 15 to make it compliant with national policy.
− Chapter 15 understates the importance of heritage and coverage should be expanded to indicate the scale and variety of what is involved including the need to secure listed building status for the shopping building, and the need to protect modern architecture, including from the interwar period.
− Support the approach to protecting and enhancing the character, diversity and cultural significance of the Borough’s historic assets, although this should not affect the ability of New Town buildings to adapt to changing needs in their respective Use Classes.
− The protection and enhancement of heritage assets must be taken into account during the masterplanning and application determination stages for all developments.

Community Facilities and Community Development
− The hospital should be extended prior to housing growth.
− Community development has not been translated into the Core Strategy from the Sustainable Community Strategy. Should also be more links to quality of life.
− Should reflect the importance of social inclusion and local economic development within new neighbourhoods.
− Requirements for places of worship could be disregarded by being included in the term ‘community facilities’.
− Policy CS18 only refers to the protection of local centres, which will not be effective in ensuring their viability, where some change and redevelopment may become necessary.

Minerals
− Policy CS21 should state the intention to meet the sub-regional apportionment and that the shortfall in requirements to meet our full needs will be met through permitting additional resources or through imports, with associated infrastructure in place.
− Policy CS21 should go further than currently drafted and contain a commitment to meet the sub-regional apportionment; to maintain a landbank in accordance with national and regional policy; and to identify a Mineral Safeguarding Area.
− May have been useful to include a policy to safeguard mineral reserves and ancillary plant/infrastructure of strategic importance.

Monitoring and Risk Analysis
− Chapter 17 contains no policy or mechanisms to put in place an alternative strategy if either delivery of housing falls behind the RSS requirement, or difficulties are encountered which delay the delivery of allocated housing sites.
− Objective 13 target is not sufficiently positive in relation to no net loss of biodiversity – should relate to actively pursuing opportunities to achieve a net gain across the region.
Derivation and selection of targets and indicator bundles is not transparent, and the latter are not cross-referenced to the former.

Risk analysis should include the probability and potential timescales for possible risks arising.

Other issues

- Brownfield sites – should state that the priority for new housing development should be on previously developed land.
- Drivers for Change – MKSMSRS should be stated as a key driver for change, as should the effective cross-boundary co-ordination of growth with adjoining authorities.
- Plan end date – should state that although the end date of the plan is 2026, there is a longer term policy provision for Milton Keynes to continue to grow until 2031.
- City status - written desire to achieve City Status should be entered into the Core Strategy.
- Emergency Services – reference to emergency services throughout the document should be replaced by ‘police, fire and ambulance services’. Welcome reference to ensure there is a proper opportunity to make service provision and provide essential infrastructure.
- Water - more work is needed to consider the impacts of the proposed development levels on the water environment.

Diagram/figures

- Fig 1.1 – fails to show a clear picture of the transport and other linkages outside of the district boundary. J13 is incorrectly labelled.
- Fig 2.1 – diagram fails to show the correct proposed option for the East-West rail link as omits the Aylesbury spur. Also misses off the A418 to Aylesbury. Counties should also be shown on the figure.
- Key diagram should distinguish between existing and proposed extensions to the linear park network.
- Salden Chase should not be shown as part of Milton Keynes on the Key Diagram.
- Area 10.4 in the WEA should be removed from Figure 16.1 or an explanation given regarding the decision that development here is considered unacceptable.

Consultation, previous stages, and document structure

- The document should be more visionary and more positive, whereas it currently establishes traditional land use constraints.
- Consultation has not been undertaken in line with good practice.
- Document is difficult to follow/use for non-planners.
- New issues raised in this document compared to the previous version.
- Assessment of growth options was unbalanced and it prejudiced the appropriate assessment of alternative locations.
Milton Keynes Council has published its Core Strategy: Revised Proposed Submission Version for a six week period of consultation from **Wednesday 6th October – Wednesday 17th November 2010**.

As part of the Milton Keynes Local Development Framework, Milton Keynes Council plans to submit the Core Strategy Development Plan Document to the Secretary of State for Communities and Local Government. The submission documents, including the Core Strategy: Revised Proposed Submission Version, are being published for public representations.

**Title of Document:** Milton Keynes Core Strategy Development Plan Document

**Subject matter:** The Milton Keynes Core Strategy sets out the vision for the Borough in the year 2026 and how we are going to get there. It provides the objectives and strategy for the future development of the city and identifies the major areas where growth and change will take place. All future planning policies and documents within the Local Development Framework will be in accordance with the Core Strategy and help deliver its vision and principles.

**Area covered:** The Core Strategy covers the whole of Milton Keynes Borough administrative area.

**Period of publication:** Wednesday 6th October – Wednesday 17th November 2010.

**Address to which representations should be sent:**

- **By post:** Development Plans Team
  Milton Keynes Council
  FREEPOST NATE 294
  Spatial Planning
  Civic Offices
  1 Saxon Gate East
  Central Milton Keynes
  MK9 3BR.

- **Online:** [http://miltonkeynes-consult.limehouse.co.uk](http://miltonkeynes-consult.limehouse.co.uk)

- **By email:** corestrategy@milton-keynes.gov.uk

- **By fax:** 01908 252330

Please note the following:

1. All responses should be made on the Representations form. Representations may be made in writing or by way of electronic communications.
2. Representations may be accompanied by a request to be notified at a specified address of any of the following:
a. That the Milton Keynes Core Strategy has been submitted for independent examination
b. The publication of the recommendations of any person appointed to carry out an independent examination of the Milton Keynes Core Strategy
c. The adoption of the Milton Keynes Core Strategy.

3. All representations received during the previous Pre-Submission Publication period (February – March 2010) remain valid and will be submitted to the Secretary of State alongside any representations received at this stage.

STATEMENT OF ARRANGEMENTS FOR INSPECTION OF THE CORE STRATEGY AND OTHER SUBMISSION DOCUMENTS

All submission documents, including the Milton Keynes Core Strategy and other supporting documents, will be available to view and download on the Council’s website at http://www.milton-keynes.gov.uk/core-strategy-publication

In addition, documents will also be available for inspection at the Council’s Civic Offices (1 Saxon Gate East, Central Milton Keynes). All libraries within the Borough will also hold reference copies of the Milton Keynes Core Strategy: Revised Proposed Submission Version and Sustainability Appraisal. The location and opening times of your nearest library can be found on the Council’s website at http://www.miltonkeynes.gov.uk/library_services/DisplayArticle.asp?ID=21971.

All representations on the Core Strategy should be made using the ‘Representation Form’. This will ensure that the Council has all the information needed to process any representation you wish to make. You should refer to the ‘Guidance Note for Respondents’ before completing the form. Copies of the Representation Form and Guidance Note for Respondents are available online, at the Civic Offices, from all public libraries in the Borough or by contacting the Development Plans Team (as below).

The Representation Form can be completed online using our ‘Limehouse’ consultation system at http://miltonkeynes-consult.limehouse.co.uk. Alternatively, you can fill in a Representation Form and post, email, or fax it back to the Development Plans Team:

- By email, to corestrategy@milton-keynes.gov.uk;
- By fax, to 01908 252330;
- By post, using our freepost address (no stamp needed) to Development Plans Team, Milton Keynes Council, FREEPOST NATE 294, Spatial Planning, Civic Offices, 1 Saxon Gate East, Central Milton Keynes, MK9 3BR.

All comments on the Core Strategy: Revised Proposed Submission Version must be received by the Development Plans Team no later than 5pm on Wednesday 17th November 2010.

Comments received on the Core Strategy: Revised Proposed Submission Version will be considered alongside the submitted Core Strategy as part of an examination by an independent Planning Inspector. All comments received at this stage must relate to legal compliance or the tests of soundness. See the ‘Guidance Note for Respondents’ for details. Please note that copies of all comments (including your personal details) will be made available for the public to view, and therefore cannot be treated as confidential.

If you need further information or assistance, please contact the Council’s Development Plans Team by telephone on 01908 252599 or by email at development.plans@milton-keynes.gov.uk.
As used in statutory notices, appearing in

**MK News** (6 October, 2010)

**Milton Keynes Citizen** (7 October, 2010).
D2 REPRESENTATION FORM AND GUIDANCE NOTE FOR RESPONDENTS
Please read the ‘Guidance Note for Respondents’ (at the end of this form) before completing this form.

Please return to Milton Keynes Council by 5pm on Wednesday 17th November 2010. This form can be completed online using our ‘Limehouse’ consultation system at http://miltonkeynes-consult.limehouse.co.uk, where you can also print or save a copy for your own records.

Alternatively, you can send completed forms to us:
- By email, to corestrategy@milton-keynes.gov.uk
- By fax, to 01908 252330
- By post using our freepost address, to Development Plans Team, Milton Keynes Council, FREEPOST NATE 294, Spatial Planning, Civic Offices, 1 Saxon Gate East, Central Milton Keynes, MK9 3BR

Please do not send duplicates. Note that all comments will be made available for the public to read and therefore cannot be treated as confidential. Type or print clearly in black or blue ink. Use a separate form for each representation. If you use additional sheets, please mark them clearly with your name or organisation.

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Name or Organisation:

Representation Details

Q1. To which part of the Core Strategy does this representation relate? Please use a separate form for each section you wish to comment on

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<th>Paragraph Number</th>
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Q2. Do you consider the Core Strategy is...? Please mark one answer for each question

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<td>(a) Legally compliant</td>
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<tr>
<td>(b) Sound</td>
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If you answered ‘No’ to Q2(b), please complete Q3. In all other circumstances, please go straight to Q4.

Q3. Do you consider the Core Strategy is unsound because it is not... (please mark all you think apply)

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<th>(a) Justified</th>
<th>(b) Effective</th>
<th>(c) Consistent with national policy</th>
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Q4. Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance of the Core Strategy, please also use this box to set out your comments.

Continue on a separate sheet if necessary. Mark any additional pages with your name or organisation.
Q5. Please set out what change(s) you consider necessary to make the Core Strategy legally compliant or sound, having regard to the test you have identified in Q3 where your comment relates to soundness. You will need to say why this change will make the Core Strategy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Continue on a separate sheet if necessary. Mark any additional pages with your name or organisation

Q6. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

(a) No, I do not wish to participate at the oral examination

(b) Yes, I wish to participate at the oral examination

Q7. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary. Please note the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the examination.

Q8. Do you wish to be notified of any of the following? Please mark all that apply. We will contact you using the details you have given above unless you specify an alternative address.

(a) when the Core Strategy DPD has been submitted for independent examination

(b) when the Inspector’s Report is published

(c) when Milton Keynes Council adopts the Core Strategy

Signature

Date
MILTON KEYNES
LOCAL DEVELOPMENT FRAMEWORK

CORE STRATEGY
REVISED PROPOSED SUBMISSION PUBLICATION

GUIDANCE NOTE FOR RESPONDENTS

Publication Period:

Wednesday 6\(^{th}\) October – Wednesday 17\(^{th}\) November 2010
Introduction
The purpose of this Guidance Note is to assist those wanting to make representations on the Core Strategy: Revised Proposed Submission Version (which can be viewed online at http://www.milton-keynes.gov.uk/core-strategy-publication). The Core Strategy: Revised Proposed Submission Version is available as part of the ‘pre-submission publication’ stage, to allow the public and other stakeholders to make comments prior to submission to the Secretary of State. The representations will be considered alongside the Core Strategy as part of the examination by an independent Planning Inspector. Representations received during the previous Pre-Submission Publication period (February-March 2010) remain valid and will be submitted to the Secretary of State alongside representations received at this stage.

The Planning and Compulsory Purchase Act 2004 (the 2004 Act, http://.opsi.gov.uk/ACTS/acts2004/ukpga_20040005_en_1) states that the purpose of the examination is to consider whether a development plan document (DPD) complies with the legal requirements and is ‘sound’. You should remember when responding at this publication stage that any objections you make to the Core Strategy must relate to legal compliance or soundness. Question 2 on the Representation Form asks whether your comment relates to legal compliance or soundness.

- If you are seeking to make representations on the way in which Milton Keynes Council has prepared the Core Strategy, it is likely that your comments or objections will relate to a matter of legal compliance.
- If it is the actual content on which you wish to comment or object to, it is likely it will relate to whether the Core Strategy is justified, effective or consistent with national policy.

Legal Compliance
You should consider the following before making a representation on legal compliance:

- The Core Strategy should be within the current Local Development Scheme (LDS) and the key stages should have been followed. The LDS is effectively a programme of work prepared by the Council, setting out the Local Development Documents it proposes to produce over a 3 year period. Our most recent LDS (published April 2009) includes the Core Strategy and the required key stages in the preparation of the Core Strategy have all been followed. A previous Pre-Submission stage was held in February-March 2010. However, following the revocation of Regional Spatial Strategies by the coalition government, the Council has taken the opportunity to review the Core Strategy. This stage is therefore not shown in the April 2009 LDS, but has been discussed with the Government Office and the Planning Inspectorate.

- The process of community involvement for the Core Strategy should be in general accordance with the Council’s Statement of Community Involvement (SCI). The SCI is a document which sets out the Council’s strategy for involving the community in the preparation and revision of Local Development Documents (including the Core Strategy) and the consideration of planning applications. The Milton Keynes SCI was adopted in December 2006. The Statement of Consultation accompanying the Core Strategy sets out how consultation has been undertaken throughout the document’s preparation in accordance with the SCI.

- The Core Strategy should comply with the Regulations (i.e. the Town and Country Planning (Local Development)(England) Regulations 2004, as amended (see http://www.opsi.gov.uk/si/si2004/20042220.htm for the 2004 regulations, http://www.opsi.gov.uk/si/si2008/uksi_20081371_en_1 for the 2008 amendment and http://www.opsi.gov.uk/si/si2009/uksi_20090401_en_1 for the 2009 amendment). At this stage, the Council must publish the documents prescribed in the regulations, and make them available at their principal office and their website. The Council must also place local advertisements and notify the DPD bodies (as set out in the regulations) and any persons who have requested to be notified. The ‘Statement of Representations Procedure’ and ‘Statement of arrangements for inspection of the Core Strategy and other submission documents’ fulfil these requirements, and can be viewed on the Council’s website, at the Civic Offices, at the public libraries and in a newspaper notice.
- **The Council is required to provide a Sustainability Appraisal Report when it publishes a DPD.** As part of the development of the Core Strategy, a Sustainability Appraisal (SA) has been prepared. The SA is a tool for appraising policies to ensure they reflect social, environmental and economic factors. The SA and October 2010 update are available in all the places the Core Strategy: Revised Proposed Submission Version is available, as a supporting/submission document.

- **The Core Strategy should have regard to national policy.** The Council believes that the Core Strategy is in general conformity with national policy (as set out in the Government’s planning policy statements and guidance notes). Following the revocation of Regional Spatial Strategies, the requirement to conform with regional policy is no longer valid.

- **The Core Strategy must have regard to the Sustainable Community Strategy (SCS) for Milton Keynes.** The SCS was prepared by the Local Strategic Partnership which is representative of a range of interests in Milton Keynes. The SCS is subject to consultation and was refreshed by the Council in 2008. The Core Strategy is a key delivery mechanism for the vision and principles in the SCS and these principles have informed the preparation of the Core Strategy.

**Soundness**

To be sound, a DPD should be:

- **Justified**
  This means that the Core Strategy should be founded on a robust and credible evidence base involving:
  - Evidence of participation of the local community and others having a stake in the area;
  - Research/fact finding: the choices made in the plan are backed up by facts.

The Core Strategy should also provide the most appropriate strategy when considered against realistic and subject to Sustainability Appraisal. The Core Strategy should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved.

- **Effective**
  This means that the Core Strategy should be **deliverable**, including:
  - Sound infrastructure delivery planning;
  - Having no regulatory or national planning barriers to delivery;
  - Delivery partners who are signed up to it; and
  - Coherence with the strategies of neighbouring authorities.

The Core Strategy should also be **flexible** and able to be monitored. The Core Strategy should indicate who is to be responsible for making sure that the policies and proposals happen and when they will happen.

The plan should be flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals. Although it is important that policies are flexible, the Core Strategy should make clear that major changes may require a formal review including public consultation.

Any measures which the Council has included to make sure that targets are met should be clearly linked to an Annual Monitoring Report. This report must be produced each year by all local authorities and will show whether the Core Strategy needs amendment.

- **Consistent with national policy**
  The Core Strategy should be consistent with national policy. Where there is a departure, the Council must provide clear and convincing reasoning to justify the approach. Conversely, you may feel that the Council should include a Core Strategy policy or policies which would depart from national policy to some degree in order to meet a clearly identified and fully justified local need. In this instance it will be important for you to say in your representations what the local circumstances are which justify a different policy approach to that in national policy, and support your assertion with evidence.
If you think the content of the Core Strategy is not sound because it does not include a policy where it should do, you should consider the following questions before making representation.

- Is the issue with which you are concerned already covered specifically by any national planning policy? If so, it does not need to be included.
- Is what you are concerned with covered by any other policies in the Core Strategy or in any DPD in the Council’s Local Development Framework (LDF). There is no need for repetition between documents in the LDF.
- If the policy is not covered elsewhere, in what way is the Core Strategy unsound without the policy?
- If the Core Strategy is unsound without the policy, what should the policy say?

Similarly, if you feel the Core Strategy includes a policy that you believe should not be included, you should consider the following questions in making your representation.

- Does the policy repeat or fail to expand upon existing national planning policy?
- Does the policy contradict or misrepresent any of the supporting evidence?
- If the existing policy were to be removed, should it be replaced?

The Council considers that the Core Strategy: Revised Proposed Submission Version satisfies all these tests of soundness and is the most appropriate strategy for the future development of Milton Keynes. However, if you consider the Core Strategy is unsound against one or more of the three tests of soundness (justified, effective, or consistent with national policy), you should identify which test(s) under Question 3.

**General Advice**

If you wish to make a representation seeking a change to the Core Strategy or part of the Core Strategy, you should make clear in what way the Core Strategy is not sound, having regard to the legal compliance check and three tests of soundness set out above. You should try to support your representation with evidence showing why the Core Strategy should be changed. It will be helpful if you also say precisely how you think the Core Strategy should be changed in Question 5.

Representations should cover succinctly all the information and supporting evidence necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further submissions based on the original representation you make. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Careful consideration should be given by those making a representation in deciding how the representation should be dealt with, i.e. by written representation or by exercising the right to be heard. Only where a change is sought to the Core Strategy is there a right for the representation to be heard at the hearing session. It is important to note that written and oral representations carry exactly the same weight and will be given equal consideration in the examination process. You can tell us if and why you consider it necessary to participate at the hearing session under Questions 6 and 7.

Where there are groups who share a common view on how they wish to see the Core Strategy changed, it would be very helpful for that group to send a single representation which represents the view, rather than for a large number of individuals to send in separate representations which repeat the same points. In such cases, the group should indicate how many people it is representing and how the representation has been authorised. All representations will be given equal weight. The published Core Strategy is intended to be the final version for submission to the Secretary of State. Therefore, raising new issues in representations at this stage which have not been raised during the DPD preparation and consultation process will not be helpful. Furthermore, the Inspector will not be able to make a change unless it relates to an issue which has been subject to the proper procedures of community involvement and sustainability appraisal. In the absence of clear evidence that such procedures have been carried out, the Inspector will only be able to give limited consideration to such representations.

Representations may be accompanied (see Question 8) by a request to be notified at a specified address of any of the following:

a) that the Milton Keynes Core Strategy has been submitted for independent examination,
b) the publication of the Inspector’s Report, or
c) the adoption of the Core Strategy.
Submitting Representations
To avoid duplication of work, the Council requests that respondents do not send additional or duplicate copies of representations in more than one format (e.g. an electronic version and a hard copy). Please note that copies of all comments (including your personal details) will be made available for the public to view, and therefore cannot be treated as confidential. All representations should be made using the ‘Representation Form’ (or online version) to ensure the Council has all the information needed to process your comments. Please use a separate form for each individual representation you wish to make, to aid processing. All representations received will be acknowledged by post or email.

All forms must be received no later than 5pm on Wednesday 17th November 2010

You can submit your representations online:
– by completing the representations form at http://miltonkeynes-consult.limehouse.co.uk, where you will also be able to print or save a copy for your own records*.

Or you can send completed forms to us:
– by email, to corestrategy@milton-keynes.gov.uk
– by fax, to 01908 252330
– by post, to
  Development Plans Team
  Milton Keynes Council
  FREEPOST NATE 294
  Spatial Planning
  Civic Offices
  1 Saxon Gate East
  Central Milton Keynes
  MK9 3BR

* - If you have been involved in the earlier stages of the Core Strategy or have been contacted by the Council about the process in the past, you will already be registered on our Limehouse database, enabling you to respond online without registering again. If you have forgotten your password or username, you can contact the Development Plans team for a reminder.

If you have any questions, please contact us by email at development.plans@milton-keynes.gov.uk or by telephone on 01908 252599

Useful Links
Milton Keynes Council – Planning Policy homepage (for information regarding the Core Strategy and other documents within the Local Development Framework including the Statement of Community Involvement and Local Development Scheme) http://www.miltonkeynes.gov.uk/planning-policy

Planning Inspectorate http://www.planning-inspectorate.gov.uk/pins/appeals/local_dev

Department for Communities and Local Government – national planning policies (planning policy statements and guidance notes) which the Core Strategy must be in conformity with http://www.communities.gov.uk/planningandbuilding/planning/planningpolicyguidance/
4 October 2010

Dear

MILTON KEYNES CORE STRATEGY: REVISED PROPOSED SUBMISSION PUBLICATION

I advise you of a further consultation on a revised version of the Milton Keynes Core Strategy.

What is the Core Strategy?
The Core Strategy is an important document which forms part of the Council’s Local Development Framework. The document sets out the level of growth planned for Milton Keynes and identifies where this growth will happen. When adopted by the Council, it will set out the vision, objectives and strategy for the development of the Borough up to 2026. The Core Strategy will form the basis of all new planning policies that the Council will apply in the future.

Why has the Core Strategy been revised?
Although we consulted on a Pre-Submission Core Strategy earlier this year (February - March 2010), the new coalition government has made some far-reaching changes to the planning system, notably the revocation of the Regional Spatial Strategies which previously set our housing targets, and the return of local planning and plan-making powers to local councils. In light of these changes, the Council has taken the opportunity to revise parts of the Core Strategy.

There is more information about the Core Strategy, how we have got to this stage, and the changes that have been made in this revised Proposed Submission document on the sheet enclosed.

Consultation Dates
The revised Proposed Submission Version of the Core Strategy will be published for a six week consultation period between Wednesday 6 October and Wednesday 17 November 2010.

Consultation Arrangements
The enclosed CD includes the Core Strategy: Revised Proposed Submission Version (October 2010), along with the Sustainability Appraisal, representation form and other submission documents.

Reference copies of the documents are also available to view during normal opening hours at the Civic Offices in Central Milton Keynes (Monday to Friday, 9am to 5.15pm), and all libraries within the Borough (location and opening times can be found at http://www.milton-keynes.gov.uk/library_services/).

All documents are also available online to view and download at our website at http://www.milton-keynes.gov.uk/core-strategy-publication.

If you commented during the February-March 2010 publication period
All representations received during the previous Pre-Submission Publication period remain valid and will be submitted to the Secretary of State alongside representations received at this stage. Therefore, it is not necessary to repeat the same comments on this document that you made to the February 2010 consultation – they will all be considered together by the Planning Inspector at the Examination.

Making Representations
Comments can be made online through our Limehouse consultation system at http://miltonkeynes-consult.limehouse.co.uk/portal/ where you can also save and print a copy of your comments for your own records.

You are already registered on our Limehouse system, and your username is: XXX. To activate this account, we need you to either email (development.plans@milton-keynes.gov.uk) or call us (01908 252599), quoting the Limehouse reference number at the top of this letter, and confirming your email address. A password will then be emailed to you, enabling you to login to the system and respond online. Responding online through Limehouse will also help us to deal with your representation more efficiently and is more cost-effective for the Council.

Alternatively, you can respond using the Representation Form (pdf and word versions on the CD enclosed). Paper copies of the form are also available from the libraries, or you can ask us to post you one. The details for sending completed forms back to us are in the Guidance Note and on the form.

Database Update Form
Also enclosed is a Database Update Form, to ensure we have the correct information for you. We’d appreciate your help in making sure we have the most up-to-date contact details for you. Alternatively, if you no longer wish to be sent information about our planning policy consultations in the future, you can let us know using that form.

What happens next?
At the end of the publication period, the Council will summarise the main issues raised in all valid representations. The representations and the summary of issues will be submitted to the Secretary of State for a government appointed Planning Inspector to consider as part of a public examination in 2011.

If you have any questions regarding this letter, please do not hesitate to contact the Development Plans Team on 01908 252599, or by email at development.plans@milton-keynes.gov.uk.

Yours faithfully,

Bob Wilson
Development Plans Manager

Enc
The Development Plans team are currently checking and updating the records we hold for people who are interested in the preparation of the Council’s planning policy documents. **You are on our database as someone who has responded to a previous consultation, or asked to be kept informed of the progress of our planning documents.** This may have been in relation to the Milton Keynes Local Plan, the Core Strategy, a Conservation Area Appraisal, our waste planning consultations or an urban design document, and may date back ten years.

To ensure we only contact people who are still interested in a particular issue, we are checking the details we hold with everyone on our database. We’d appreciate it if you could complete, and where necessary correct, this form and return it to us using the FREEPOST address overleaf. If you no longer wish to be on our database, please tick the relevant box.

Please correct the information where necessary, and add details where we do not already have them. If you are on our database as an individual, rather than representing a company or an organisation, please ignore the ‘Organisation Name’ and ‘Position’ boxes. If you are no longer the correct contact for a company or organisation, please tell us the details of the person we should be contacting instead. Your email address is especially useful, if you have one, as it saves us money when sending out information. Please complete the form in BLOCK CAPITALS.

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**Office Use only. Database reference number:**
YOUR PLANNING INTERESTS
Please tell us which planning issues you are interested in. Where possible, we will only contact you about documents or consultations which we think will be of interest to you. Please tick as many of the boxes as you wish.

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<td>Employment and Economy</td>
<td>Rural Issues</td>
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<tr>
<td>Flooding and Water Issues</td>
<td>Sustainability Appraisal and Strategic Environmental Assessment</td>
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<tr>
<td>Healthy, Safe and Sustainable Communities</td>
<td>Sustainable Construction</td>
</tr>
<tr>
<td>Growth and Future Development</td>
<td>Town Centres</td>
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<tr>
<td>Housing Development, Quantities and Sites</td>
<td>Transport and Travel</td>
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<tr>
<td>Infrastructure</td>
<td>Waste</td>
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<td>Leisure and Recreation</td>
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</tbody>
</table>

Thank you for taking the time to complete this form. Please return it to us using our FREEPOST address: Development Plans Team, Milton Keynes Council, FREEPOST NATE 294, Civic Offices, 1 Saxon Gate East, Central Milton Keynes, MK9 3BR.

We will then update the details we hold for you using the information you have provided, which will help us be more effective in sending out future consultation updates.

If you have provided us with a new email address, you will receive an email from our ‘Limehouse’ online consultation system which will include a password to allow you to respond to our consultations online in the future.

Alternatively, you can fax this form back to us on (01908) 252330 (remember to fax both sides!) or email it to us at development.plans@milton-keynes.gov.uk.

If you have any questions regarding this form, please feel free to contact us on (01908) 252599 or development.plans@milton-keynes.gov.uk.
4 October 2010

Dear

MILTON KEYNES CORE STRATEGY: REVISED PROPOSED SUBMISSION PUBLICATION
WEDNESDAY 6 OCTOBER AND WEDNESDAY 17 NOVEMBER 2010

I advise you of a further consultation on a revised version of the Milton Keynes Core Strategy.

What is the Core Strategy?
The Core Strategy is an important document which forms part of the Council’s Local Development Framework. The document sets out the level of growth planned for Milton Keynes and identifies where this growth will happen. When adopted by the Council, it will set out the vision, objectives and strategy for the development of the Borough up to 2026. The Core Strategy will form the basis of all new planning policies that the Council will apply in the future.

Why has the Core Strategy been revised?
Although we consulted on a pre-submission Core Strategy earlier this year (February-March 2010), the new coalition government has made some far-reaching changes to the planning system, notably the revocation of the Regional Spatial Strategies which previously set our housing targets, and the return of local planning and plan-making powers to local councils. In light of these changes, the Council has taken the opportunity to revise parts of the Core Strategy.

There is more information about the Core Strategy, how we have got to this stage, and the changes that have been made in this revised Proposed Submission document on the sheet enclosed.

Why are we writing to you?
You may have received a letter from us in September about the Core Strategy and the Council meetings being held over the last month. We apologise for any confusion and upset caused by the letter, and hope the information in this letter is more understandable.

You are on our database as someone who has responded to a previous consultation, or asked to be kept informed of the progress of our planning documents. This may have been an earlier stage of the Core Strategy, or in relation to the Milton Keynes Local Plan, a Conservation Area Appraisal, our waste planning consultations or an urban design document.
Consultation Dates
The revised Proposed Submission Version of the Core Strategy will be published for a six week consultation period between
Wednesday 6 October and Wednesday 17 November 2010.

Consultation Arrangements
The Core Strategy and other submission documents are available online to view and download at our website at

Reference copies of the documents are available to view during normal opening hours at the Civic Offices in Central Milton Keynes (Monday to Friday, 9am to 5.15pm), and all libraries within the Borough (location and opening times can be found at http://www.milton-keynes.gov.uk/library_services/).

If you commented during the February-March 2010 publication period
All representations received during the previous Pre-Submission Publication period remain valid and will be submitted to the Secretary of State alongside representations received at this stage. Therefore, it is not necessary to repeat the same comments on this document that you made to the February 2010 version – they will all be considered together by the Planning Inspector at the Examination.

Making Representations
Comments can be made online through our Limehouse consultation system at http://miltonkeynes-consult.limehouse.co.uk/portal/ where you can also save and print a copy of your comments for your own records.

You are already registered on our Limehouse system, and your username is: XXXX. To activate this account, we need you to either email (development.plans@milton-keynes.gov.uk) or call us (01908 252599), quoting the Limehouse reference number at the top of this letter, and confirming your email address. A password will then be emailed to you, enabling you to log in to the system and respond online. Responding online through Limehouse will also help us to deal with your representation more efficiently and is more cost-effective for the Council.

If you are not able to respond using Limehouse, a representation form can be downloaded from our website at http://www.milton-keynes.gov.uk/core-strategy-publication (including a Word version you can fill in and email back to us). Paper copies of the form are also available from the libraries, or you can ask us to post you one. The details for sending completed forms back to us are in the Guidance Note and on the form.

Database Update Form
Also enclosed is a Database Update Form, to ensure we have the correct information for you. We’d appreciate your help in making sure we have the most up-to-date contact details for you. Alternatively, if you no longer wish to be sent information about our planning policy consultations in the future, you can let us know using that form.

What happens next?
At the end of the publication period, the Council will summarise the main issues raised in all valid representations. The representations and the summary of issues will be submitted to the Secretary of State for a Government appointed Planning Inspector to consider as part of a public examination in 2011.

If you have any questions regarding this letter, please do not hesitate to contact the Development Plans Team on 01908 252599, or by email at development.plans@milton-keynes.gov.uk.

Yours sincerely

Bob Wilson
Development Plans Manager

Enc
D5 INFORMATION NOTE ENCLOSED WITH PUBLICATION LETTERS

MILTON KEYNES CORE STRATEGY: INFORMATION NOTE, OCTOBER 2010

What is the Core Strategy?
The Core Strategy is an important document which forms part of the Council’s Local Development Framework. The document sets out the level of growth planned for Milton Keynes and identifies where this growth will happen. When adopted by the Council, it will set out the vision, objectives and strategy for the development of the Borough up to 2026. The Core Strategy will form the basis of all new planning policies that the Council will apply in the future.

Key issues addressed in the Core Strategy include:
- Setting high principles and standards for new development including renewable energy and sustainable design, to help tackle climate change
- Providing for the significant growth and change in the Borough’s population
- Potential proposals beyond the Milton Keynes Borough boundary which would require a consistent approach to planning. Neighbouring authorities will be encouraged to agree joint standards and a development framework for such areas
- Retaining ease of movement across the city as the population grows, transforming the public transport system to provide attractive, fast, frequent, convenient and efficient movement in the city
- The future role of Central Milton Keynes as a residential, employment, cultural, retail and leisure hub for the sub-region
- The future role of the older town centres of Bletchley and Wolverton, and existing and developing city estates and expansion areas
- The basis for seeking financial contributions from developers.

How has the Core Strategy been prepared?
There have been several stages in the preparation of the Core Strategy, which started back in 2005. Consultation was focused towards the beginning of the process (known as ‘front-loading’), when consultees could influence the developing strategy. During the ‘MK2031’, ‘Issues and Options’ and ‘Preferred Options’ stages, the community and other stakeholders were widely consulted on our proposals, and we received thousands of comments from hundreds of individuals and organisations. Alongside these main consultation stages, there has been ongoing research and evidence gathering.

In February 2010, the Council published a ‘Pre-Submission Version’ of the Core Strategy, and the public were invited to comment on the ‘soundness’ and legality of the document. We had planned to submit the Core Strategy to the Secretary of State for Examination in August 2010.

Changes to Government policy
In May 2010, a few weeks after the end of the Pre-Submission consultation, the Secretary of State announced his intention to abolish Regional Spatial Strategies. This was confirmed on 6 July 2010 by the decision to revoke Regional Spatial Strategies, including the South East Plan, with immediate effect. The South East Plan had determined our housing figures, setting out the number of homes to be built in the Borough over the coming decades.
The revocation of the South East Plan has given the Council the opportunity to review its plans for the future of the Borough without housing targets imposed at regional level. In August, the Local Development Framework Advisory Group members outlined the changes to the Core Strategy that they wanted to see made in light of the removal of the South East Plan housing figures. The changes were signed off by Full Council on 14 September. We are now publishing a Revised Proposed Submission Core Strategy for consultation which incorporates those changes.

What has changed in the Core Strategy?
As well as removing reference to the South East Plan throughout the document, the major changes to the Core Strategy are:
- A reduction in the overall housing requirement to 28,000 homes to 2026 within the Borough based on 1,750 new homes per year. This is a reduction of around 6,000 from what remained to be completed of the South East Plan requirement.
- Removal of the South East and South West Strategic Development Areas
- Inclusion of the Local Plan Strategic Reserve Areas as allocations for up to 2,500 homes and other uses. These would have formed part of the SE SDA. This does not include the Tickford Fields Farm Reserve Area on the edge of Newport Pagnell, which will be considered again when we look at site allocations
- Retention of the aspiration for 2,400 homes in the rural area by 2026. To achieve this will need on average 110 new homes per year.

Consultation Dates
The Revised Proposed Submission version of the Core Strategy will be published for a six-week consultation period from Wednesday 6 October to Wednesday 17 November 2010.

If you commented during the February-March 2010 publication period
All representations received during the previous Pre-Submission Publication period remain valid and will be submitted to the Secretary of State alongside representations at this stage. Therefore it is not necessary to repeat the same comments on this document that you made to the February 2010 version – they will all be considered together by the Planning Inspector at the Examination.

What happens next?
At the end of the consultation period, the Council will summarise the main issues raised in all valid representations. The representations (including those from the February 2010 publication period) and the summary of issues will be submitted to the Secretary of State for a Government appointed Planning Inspector to consider as part of a public examination in 2011.

Further Information
There is more information and the full version of the Core Strategy, along with representation forms and background documents available to view and download at our website, at http://www.milton-keynes.gov.uk/core-strategy-publication.

Reference copies of the documents are also available to view during normal opening hours at the Civic Offices in Central Milton Keynes (Monday to Friday, 9am to 5.15pm) and all libraries within the Borough (locations and opening times can be found at http://www.milton-keynes.gov.uk/library_services/).
**D6 SUMMARY OF KEY ISSUES RAISED DURING CONSULTATION**

This summary forms the second part of the Regulation 30(1)(e) statement

498 responses were received during the publication period, from 83 separate organisations or individuals.

- Bullet points are generally statements made from the point of view of the respondent, as a brief summary of their response. Similar or related comments have been grouped where appropriate.
- This is a summary of the main points raised by the respondents. Where a point has been made several times, it has been highlighted in italics.
- Some points could be relevant under more than one topic area, but they have been included where it is deemed most appropriate.
- This summary only considers representations made to the Revised Proposed Submission version of the Core Strategy, received during the October 2010 publication period. Comments received during the February 2010 period are summarised in a separate list. The comments on the February 2010 version cover a wider range of topics when compared to the October 2010 publication, as respondents were not required to resubmit their comments where the content had not changed.

**Growth Strategy**

- Support for Sherington as a selected village, but with more housing than suggested. Also, support for Newport Pagnell as a Key Settlement.
- Welcome retention of 2,400 homes target for the rural area and support for key settlements as focus for rural development.
- **Support for strategy as a locally devised and driven policy framework, evidence-based.**
- Support for the need to review village boundaries
- Support for the protection of key facilities and services in key rural settlements, and for local centres providing shopping and services to minimise car use.
- Support references to provision of new convenience floorspace of 3,500sqm.
- Support growth to fulfil MK’s sub-regional role.
- Insufficient focus on rural area. Should focus on Newport Pagnell as most sustainable location for rural development. Remove reference to ‘limited development’. Identify Tickford Fields SRA.
- Too much reliance on delivery from the WEA when commencement uncertain, plus flats in CMK which may no longer have demand.
- Insufficient evidence that sites with permission are deliverable. Over-reliance on strategic sites in one or two locations.
- Should highlight importance of maintaining and enhancing vitality of rural settlements.
- **Policy CS8 should refer to brownfield sites to allow flexibility.**
- Little Brickhill should not be considered an ‘Other Village’ – it could take a limited amount of new housing.
- Reducing housing figures for the city, but not the rural area, changes balance.
- Rural housing limit not based on proper analysis of actual requirements.

**Housing Figures**

- **Revised target is realistic and achievable.**
- Welcome reduction in numbers and hope that it will allow focus on quality.
- Welcome reduction in housing targets and their impact on rural MK.
- Housing targets are not based on sound evidence; unachievable, socially undesirable and unsustainable. Concern over source of housing (need) figures and growth predictions.
- **Should make clear that figures are not maximum.**
– Need for a strategy to plan for contingency some element of supply does not come forward.

– Housing figures do not follow PPS3 guidance on determining the appropriate level of provision.

– 1,750 homes per year not proven or supported by evidence. No flexibility. Incorrect baseline.

– Ignores SHMA evidence. Housing figures just based on existing commitments and past completions, not consideration of the SHMA. Housing targets go no way to meeting MK’s housing demand.

– CS says it will use SHMA for housing types and range, but not for total figure; inconsistent approach.

– Concern over relying on past rates during economic downturn – may artificially depress overall scale of provision.

– Lack of flexibility in housing land supply and lack of consistency in role of Site Allocations DPD for future allocations.

– Deliverability of housing figures is not fully evidenced and figures are not based on need.

– Insufficient flexibility to take into account potential changes to density in some development areas.

– Reference to Stantonbury Park in Table 5.7 should say 600 dwellings, not 530. 600 is the appropriate capacity.

– Strategy relies on existing commitments that haven’t come forward anyway. Essential that additional sites are allocated.

– Limiting the availability of housing land on the premise that only so many houses can be built becomes a self-fulfilling prophecy.

– Housing land supply cannot simply be turned on and off, so a pipeline of suitable and available land must be identified to meet requirements.

– Decision has been taken to limit housing provision based on short term economic factors rather than levels of growth necessary to deliver appropriate levels of economic growth.

– Object to split of housing target between urban and rural areas – location of new housing must be based on the best possible, sustainable and available locations.

Strategic Development Areas, Strategic Reserve Areas and future growth

– Welcome removal of the SESDA.

– Support for allocation of SRAs as a sustainable urban extension. Different parcels allow phased delivery.

– Support future proofing.

– Support principle that majority of new homes will be focused on and adjacent to the existing urban area.

– Future-proofing reference should be removed. Object to assumption re. expansion in adjoining areas. Inappropriate to talk about future-proofing SRAs as any future growth must consider all possible areas. No evidence that future growth would need to be outside the MK boundary. Growth beyond 2026 in a future review must consider all possible sites. Applications for sites pre-empting that, on adjacent authority land, should be dismissed as premature.

– Unacceptable to impose features of current MK design onto future areas, or into areas in adjacent authorities.

– Should acknowledge that future growth will involve development in most sustainable locations which includes land outside our administrative area.

– Requires clarification of how four disparate SRAs will form a single urban extension. SRAs are disconnected from each other and the city. Should be linked and comprehensively planned.

– Should resist development in adjacent areas as will gain development but miss out on the New Homes Bonus.

– Capacity of SRAs should only be determined through Development Framework.

– Remove reference to development in un-named neighbouring areas. No testing or agreement for such a proposal. Rationale suggests cross-boundary development is still acceptable.

– Precise alignment of the Bedford to MK Waterway should be determined through development framework.

– Should add concept of allocating new SRAs to allow flexibility if more land is needed. Should allocate more, smaller expansion areas to allow for a flexible approach.

– No justification for including SRAs in the 2010-2016 timeline. Should recognise that some can deliver earlier.

– Deletion of SDA and allocation of four SRAs is fundamentally flawed. Should re-instate SESDA to provide flexibility in supply and allow proper planning of the area.
– No work carried out to assess the merits of the four SRAs, let alone to assess whether they are the most appropriate strategy when considered against reasonable alternative.
– Additional adjacent land should be allocated to allow the SRAs to be planned comprehensively.

Employment and Economy
– Support jobs:homes ratio.
– Support inclusion of SEMLEP area.
– Support for references to UCMK and recognition of role.

– Economic development policies not based on the evidence of recent performance of the local economy and lack explicit proposals to deliver necessary jobs.
– Employment target could result in further commuting and undermine economic growth in other areas.
– Lack of mention about LEP and its importance for delivering economic development.
– Imbalance between jobs and homes, will encourage in-commuting.
– Employment target is inconsistent with SEP policy, and no evidence as to whether the housing allocations provide sufficient employment land within development, or will provide sustainable transport options.
– Reducing growth may mean MK struggles to attract new investment. Must ensure flexibility in delivery assumptions so as not to deter investment.
– Should recognise importance of distribution and logistics activity, not just knowledge based jobs.
– Elfield Park should be included as employment land, and also identified as suitable for leisure and recreation.

Transport and traffic
– Support safeguarding of M1 junction and crossing provision. Welcome acknowledgement of opportunity for new M1 J13a.
– Support recognition of wider transport implications of growth beyond MK.
– Support reference to East-West Rail.
– Support extension of grid roads into major new development areas.

– Against proposals for M1 bridge. M1 forms barrier between MK and Central Beds.
– Unclear if changes will have an impact on transport proposals. Need to continue to focus on sustainable transport choices.
– Should include reference to the need for Olney Bypass.
– Need to get involved with the Route Strategy for rail services.
– Insufficient recognition of transport/traffic impacts on adjacent villages.
– Failure to acknowledge that some transport infrastructure (e.g. EW Rail, Bletchley Southern Relief Road) will be on land outside the Borough.
– No agreement on need for M1 J13a. Could induce car travel.
– Transport section should be less car-centric and aim towards non-discriminatory city-wide access for all. Secure the modal shift to public transport by applying traffic demand management measures. Implement the Sustainable Integrated Transport Strategy.
– Lack of delivery mechanism and no consultation on the need for a Bletchley southern relief road.
– Need technical work to fully assess the traffic impacts of development on the wider road network. No comprehensive plan for the highway network.

Process
– CS continues to take no notice of the wishes of people living in areas to be affected. Wilfully diverted from vision of founding fathers.
– Cross-boundary development should see a re-drawing of authority boundaries.
– Disappointed that points identified in February/March 2010 have not been addressed, including mapping, Tariff/CIL/pooling, strategic transport.
– Change the name of the SRAs for clarity.
− Strategy will not meet the PPS12 requirement of 15 years plan period at adoption.
− Does not reflect the CALA Homes judgement and should be in conformity with the SEP, containing no justification for not doing so.
− SRAs in the Local Plan were identified as first areas of search, not that they would be automatically allocated. Should assess all possible sites.
− Threshold of what constitutes a strategic site must be specified.
− Changes brought forward in isolation from consideration of related factors.
− Not based on sound evidence.
− No fundamental different in document over its development from 2006 onwards. Was consultation a waste of time?
− Now that RSS is scrapped, should initiate debate within MK on housing targets, and do an early review to carry that forward. Should have a lower figure now to provide flexibility in the future.
− Policies must make reference to the regional policies and targets of the South East Plan.
− By re-issuing the Core Strategy for pre-submission, rather than consultation on issues and options, the opportunity for interested parties to comment on underlying principles has not been allowed.
− Sustainability Appraisal did not form an integrated part of the preparation of the current document.

Other
− Support recognition of joint working.
− Support intention to achieve sustainable development and strong place-making principles.
− Support extension of linear parks along watercourses listed, but should also mention their tributaries.
− Support for International Sporting City concept, but recommend some additions to strengthen it.
− Support opportunity to consider co-ordination of municipal waste management, references to planning for waste management needs of small businesses, and use of Waste DPD to plan for waste management.
− Support for protection of leisure, recreation and sporting facilities.
− Support overarching vision.
− Support vision to widen range of house types including executive homes.
− Support key delivery targets of Objective 16.
− Support inclusion of the Bedford to Milton Keynes Waterway.
− Support the approach to protect and enhance the character, diversity and cultural significance of historic assets.

− No evidence of need for regional sports facility.
− Woburn Golf Club should be identified as a sporting facility hosting major sporting events.
− Description of Biodiversity Opportunity Areas is misleading.
− Should recognise the role of landscaping along grid road corridors in defining character.
− Policy CS20 on historic and natural environment is inconsistent with national guidance.
− Should be flexibility in how listed and historically important buildings are treated in terms of BREEAM targets etc.
− Lack of justification for requiring SRAs to meet eco-town standards.
− Evidence base to support aspiration for new tariff is not explained.
− No justification for higher than national minimum standards for construction (or Community Energy Networks policy). Requires evidence to test viability.
− Policy CS13 should refer to the need for long term sustainability and maintenance of development.
− Vision should make clear that supporting infrastructure could be on-site or contributions for off-site work/improvements.
− Local experience indicates that contingency planning for high pupil yield will be required even where school sites have already been identified. Reserve sites for education provision should be identified and protected.
− School Organisation Framework should be included in Figure 1.2, and Appendix E should be updated.
− Should be explicit about which development will be part of a new tariff agreement.
− Reference to New Homes Bonus should be included and impact on tariff clarified.
– Should reflect that meeting cost of additional infrastructure under a new tariff agreement is likely to render development unviable as the majority of developments are covered by existing tariff.
– Minerals policy has no justification for saying why SEP apportionment is unsustainable.
– Fails to retain Bletchley as the primary shopping centre in Milton Keynes.
– Putting forward ‘Belvedere Nursery’ site for development.
– Vision should go beyond 2026 and should be more ambitious – look to become a powerhouse for the region.
– Object to assertion there is qualitative need for a casino.
– Policy CS14 – duplication of requirements adequately dealt with through building regulations.
– Set out baseline against which CO₂ emission reductions should be assessed.
– Objection to the suggestion that out-of-centre retail development in other locations in the city (outside district and town centres) is acceptable in special circumstances.
– Important to acknowledge that recent market conditions will not persist over the plan period.
– Retail development should be directed to centres where there is demand/capacity in order to achieve a more sustainable network of centres to serve local needs.
This Equalities Impact Assessment scoping assessment addresses the work and function of the Development Plans team. The core functions of the team are as follows:

- Preparing planning policy documents in accordance with statutory regulations, government guidance and best practice, including consultation on documents which meets (and usually exceeds) the requirements of the Council’s Statement of Community Involvement
- Providing policy advice to Development Control, Members and other stakeholders, partners and the public as necessary
- Responding to consultations from government bodies, neighbouring authorities and internal stakeholders and partners
- Working with neighbouring authorities and other partners to deliver co-ordinated development across boundaries, where appropriate
- Preparing evidence and gathering background information to help inform the development of our planning policy documents

Q2. What is the purpose of this (aims and objectives)?

To ensure development in Milton Keynes is guided by effective policies supported by a robust evidence base which deliver sustainable development in sustainable communities with good quality of life and high standards of design.

Q3. Who is affected?

The work undertaken by the Development Plans team has the potential to impact on everyone living, working or spending time in Milton Keynes because of the wide-ranging, strategic nature of the function.
Q4. Does, or could, the area of work have an adverse effect or impact on members of the equality groups?

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<tr>
<th>AGE</th>
<th>Yes / Adverse</th>
<th>No / Neutral / Positive</th>
<th>X</th>
<th>Unclear</th>
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The way our consultations are handled is increasingly web-based, which makes getting involved easier for many parts of the community. However, this might not be the case for older residents who may have less opportunity or wish to get involved in this way. To ensure that those without web-access are still able to engage with the process, we continue to write to consultees by letter (for those we do not have an email address for), make hard copies of documents available in the libraries (or we can send them to individuals on request) and advertise in newspapers and other forms of communication which do not rely on web-access alone.

The outcomes of our work help to encourage sustainable communities, ensuring that new developments enable easy access to local services, which would assist the older members of the community by ensuring the services they need to access can be reached on foot or by public transport. Our work also addresses the need for healthier and safer communities, and encourages flexible lifetime homes, meaning older residents should be more able to remain within their community.

Other ways in which the function provides benefits to people of certain age groups include providing work experience opportunities within the team for young people from the Borough, and regularly providing information to students undertaking projects/dissertations relating to planning in Milton Keynes. The Development Plans team also has increasingly strong links with the University Centre Milton Keynes, including supporting the growth of UCMK which will continue to provide opportunities to existing and future higher education students.

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<tr>
<th>DISABILITY</th>
<th>Yes / Adverse</th>
<th>No / Neutral / Positive</th>
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<th>Unclear</th>
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As above, encouraging sustainable, healthy and safe communities, and flexible lifetime homes will help new developments to bring positive benefits to disabled members of the community.

Through our consultations, we endeavour to make accessible versions of our documents available on request (for example, large print or audio versions). Our electronic consultation documents are compatible with the screen reader technology used by blind and partially sighted users.

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<tr>
<th>RACE</th>
<th>Yes / Adverse</th>
<th>No / Neutral / Positive</th>
<th>X</th>
<th>Unclear</th>
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Alongside making documents available in alternative formats on request, we also offer to make our documents available in alternative languages which would make them more accessible to non-English speakers.

As discussed above, our work encourages healthy and safe communities: by reducing crime and the fear of crime, it may allow residents of all races to feel safer in their community and in the Borough as a whole.
As with ‘Race’ above, encouraging healthy and safe communities may reduce the fear of crime for all members of the community, which may have particular benefits for women. Also, supporting improvements to the public transport system may also have positive benefits for women in particular, who are more likely than men to use public transport.

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<tr>
<th>GENDER</th>
<th>Yes / Adverse</th>
<th>No / Neutral / Positive</th>
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<th>Unclear</th>
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</table>

It is unlikely that our work will have any particular impact on the sexual orientation equality group as distinct from the rest of the general population. One possible area might be around encouraging safer communities, which, as above, could reduce fear of crime for individuals.

<table>
<thead>
<tr>
<th>SEXUAL ORIENTATION</th>
<th>Yes / Adverse</th>
<th>No / Neutral / Positive</th>
<th>X</th>
<th>Unclear</th>
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</table>

As above, it is unlikely that the Development Plans function would have any specific impact on members of the community holding a particular religious belief as compared to the rest of the general population. However, as part of developing sustainable communities, we promote the provision of community facilities, which may be suitable for use by faith or religious groups.

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<thead>
<tr>
<th>RELIGION / BELIEF</th>
<th>Yes / Adverse</th>
<th>No / Neutral / Positive</th>
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<th>Unclear</th>
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</thead>
</table>

Impacts on these groups are likely to be positive in many cases. One of the research elements the team is involved in is the Strategic Housing Market Assessment which assesses housing need in the Borough to inform our affordable housing requirements.

Our work also encourages economic development and jobs growth which may provide opportunities for members of this equality group. The function also encourages walkable neighbourhoods and improvements to public transport provision which will assist non-car owning households and individuals in accessing services and jobs.

Other parts of our work help to improve the environmental standards of construction. For example, increasing the energy efficiency of new homes will reduce heating costs for their residents and contributions to the Carbon Offset Fund allow the insulation and efficiency of older housing stock to be improved at a subsidised cost.

The Development Plans team also has a role in delivering regeneration in some of the more deprived areas of the city, which would improve quality of life and opportunities for the residents of these areas.
Q5. **Is the area of work relevant to help promote equality for members of these groups?**

<table>
<thead>
<tr>
<th>Group</th>
<th>Yes</th>
<th>No</th>
<th>Unclear</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Age</td>
<td>X</td>
<td></td>
<td></td>
<td>See comments made above to explain the broad relevant areas. The work of the Development Plans team aims to have benefits for all residents and visitors to Milton Keynes, rather than necessarily picking out specific target groups.</td>
</tr>
<tr>
<td>Disability</td>
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<td></td>
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</tr>
<tr>
<td>Race</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Gender</td>
<td>X</td>
<td></td>
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<tr>
<td>Sexual Orientation</td>
<td>X</td>
<td></td>
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<td></td>
</tr>
<tr>
<td>Religion/Belief</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Deprived / Socio-Economic Disadvantage Groups</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Q6. **Do you hold feedback/data from the equality groups that influences, affects or shapes this project?**

<table>
<thead>
<tr>
<th>Group</th>
<th>Yes</th>
<th>No</th>
<th>Unclear</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Age</td>
<td>X</td>
<td></td>
<td></td>
<td>We hold feedback from all these groups as part of the consultations undertaken for our planning policy documents. However, no distinction is made between different groups – we do not collect information to be able to identify if a respondent is from a specific group. If a response from an organisation or association representing the views of a specific group was submitted, that could be identified as such if they had given the name of that organisation.</td>
</tr>
<tr>
<td>Disability</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Race</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Gender</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sexual Orientation</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Religion/Belief</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Deprived / Socio-Economic Disadvantage Groups</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Q7. **Using the assessment in Questions 4, 5 and 6, should a full assessment be carried out on this area of work?**

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>X</th>
</tr>
</thead>
</table>

Q8. **What is the justification for the decision about full assessment?**

It is considered that the nature of the work undertaken by the Development Plans team does not have any identifiable adverse impacts on the equality groups as distinct from the general population, and in many cases, the function provides the opportunity to create positive impacts for them.

Consideration is given when planning consultations to ensure that ‘hard to reach’ groups are not excluded from accessing information and engaging in the process, and positive steps are made in making information available in different formats on request, as discussed under Question 4. Through consultations, the team also contacts specific groups and forums who represent these equality groups, for example through contacts in the Local Strategic Partnership, the Travellers Forum and the Milton Keynes Council for Voluntary Organisations. We also rely on the Town and Parish Councils (including those neighbouring the Borough) to disseminate information to residents in their parishes, to help spread awareness of our work.

All responses to consultations are considered individually and given equal weight to ensure all views are taken into account. We undertake and use research (for example, the Strategic Housing Market Assessment) to ensure we are aiming to deliver the correct mix of tenures and housing types to meet the needs of all parts of the community. Our documents are prepared to be in conformity with government guidance and best practice, and they help deliver the aims of the Sustainable Community Strategy which has been prepared with the needs of equality groups in mind.
The outcomes of our work (for example, the planning documents we prepare) are used to determine planning proposals, which in many cases will be subject to an Equalities Impact Assessment to consider if there are any specific issues that need particular attention.

Q9. What is the priority for the full assessment?

N/A

Q10. Who will be involved in the assessment, and how?

N/A

This preliminary impact assessment was approved by the Assistant Director

Date:
STAGE 2 – INFORMATION GATHERING OF THE EQUALITY IMPACT ASSESSMENT

Q1. Is there any indication that particular policies/services create problems for specific groups?

<table>
<thead>
<tr>
<th>Group</th>
<th>Cohesion</th>
<th>Religion of belief</th>
</tr>
</thead>
<tbody>
<tr>
<td>Age</td>
<td>Cohesion</td>
<td>Religion of belief</td>
</tr>
<tr>
<td>Gender</td>
<td>Disability</td>
<td>Deprived/socio-economic disadvantage</td>
</tr>
<tr>
<td>Sexual orientation</td>
<td>Race</td>
<td>No indication</td>
</tr>
</tbody>
</table>

X

Q2. Summarise any likely adverse impact in the area of the assessment

As discussed in the Stage 1 Assessment for the Development Plans Function, the work of the team has overall benefits for all of these groups, as part of the wider population. As in Stage 1, policies relating to encouraging sustainable communities, public transport improvements, walkable/accessible neighbourhoods and services, and so on, have benefits for the wider population, but may have greater benefits for individuals from the equality groups listed above.

In addition, our work on consultation is carried out in such a way as to ensure that these specific equality groups are not put at a disadvantage compared to the wider population, and are not excluded from getting involved in our planning work.

Q3. What previous or planned consultation on this topic/policy area/project has taken place/will take place with groups/individuals? If there has already been consultation, what does it indicate about the negative impact of this strategy, project or policy?

<table>
<thead>
<tr>
<th>Equality strands</th>
<th>Summary of consultations carried out or planned</th>
</tr>
</thead>
<tbody>
<tr>
<td>Age</td>
<td>Consultations on our planning policy documents do not, generally, pick out specific equalities groups as distinct from the general population. Our methods do not exclude any groups, and we make an effort to be as inclusive as possible within reasonable limits.</td>
</tr>
<tr>
<td>Gender</td>
<td>Our adopted Statement of Community Involvement (SCI), December 2006, sets out our consultation procedures and explains how we will involve those groups of the community that may find it difficult to engage in consultations. Chapter 5 identifies a number of contact methods for a range of ‘hard to reach’ groups including gypsies and travellers; young people; older people; housing tenants and those with hearing and sight problems.</td>
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<td>Sexual orientation</td>
<td>Our consultation database, which we use to directly engage with individuals and organisations, reflects the advice in the SCI and contains details for several organisations who represent members from these equality groups, including Age UK, Central Mosque, Disability Rights Commission, Disabled Persons Transport Advisory Committee, MK Asian Women’s Network, MK Christian Foundation, MK Pensioners Society and the MK Hindu Society. We also consult with several residents’ associations, along with Town and Parish Councils and Council Members who represent residents of MK.</td>
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<td>Race</td>
<td>The organisations representing the umbrella groups, as listed in the Equalities Impact Assessment guidance have also been included on the database for future consultations.</td>
</tr>
</tbody>
</table>
Disability

In terms of the Core Strategy, there has also been some specific, focused engagement with equalities groups, including:

- a special project for schools in and around MK, asking pupils to design an ideal neighbourhood
- all residents identified as living within the V7 regeneration corridor were written to (which includes some of the most economically deprived neighbourhoods in MK)

Religion or belief

- meetings held with groups including Age Concern (now Age UK) and the Milton Keynes Council of Voluntary Organisations, the Council of Faiths and the Travellers Forum
- consultation with young people through the ‘Milk n Beans’ website; with housing tenants through the MKC Housing Forum; with members of the community with hearing difficulties and visual impairment through ‘Sound News’; information offered in Braille or large print for those with visual impairment; using articles and messages on Facebook, Bebo and Myspace.

Deprived/socio-economic disadvantage group

For all forms of consultation, the responses received have been used to influence the next stage in the preparation of our planning documents, alongside other forms of evidence and information.

Q3a. What consultation has taken place or is planned with Council staff with direct experience?

Council staff are routinely informed of our consultations through various means, including

- Tuesday Bulletin
- Consultation Finder
- Members’ Weekly News
- Growth Info sessions
- Briefings to CLT and DMTs and information cascaded down through the service
- Direct correspondence where officers are on our database
- Adverts and leaflets displayed around the Council offices
Q3b. **Comparisons Table.** Regarding the functions, policies and strategies relating to your service, is there...

<table>
<thead>
<tr>
<th></th>
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</thead>
<tbody>
<tr>
<td>More engagement with...</td>
<td>Young people</td>
<td></td>
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<td></td>
<td></td>
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<tr>
<td>Less engagement with...</td>
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<td></td>
<td></td>
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<tr>
<td>More uptake of service by...</td>
<td></td>
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<td></td>
<td></td>
<td></td>
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<tr>
<td>Less uptake of service by...</td>
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<tr>
<td>More provision of service to...</td>
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<tr>
<td>Less provision of service to...</td>
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<td></td>
<td></td>
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<tr>
<td>Any other service specific measure</td>
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</tbody>
</table>

Historically, we have had focussed engagement with school groups, as part of our awareness-raising work, in addition to the work we do with the general population.

We do not generally collect personal information about respondents to our consultations, so it is difficult to assess the uptake and interest from various groups, or to identify specifically which groups are commenting on our consultation documents.
Q3c. What research/studies/reports concerning demographic changes/trends have been used in service/policy/project planning? Or, indicate what research you intend to carry out.

<table>
<thead>
<tr>
<th>Equality strands</th>
<th>Title/type/details of report/research</th>
</tr>
</thead>
<tbody>
<tr>
<td>Age</td>
<td>No specific research planned, or previously undertaken</td>
</tr>
<tr>
<td>Gender</td>
<td></td>
</tr>
<tr>
<td>Sexual orientation</td>
<td></td>
</tr>
<tr>
<td>Race</td>
<td></td>
</tr>
<tr>
<td>Disability</td>
<td></td>
</tr>
<tr>
<td>Religion or belief</td>
<td></td>
</tr>
<tr>
<td>Cohesion</td>
<td></td>
</tr>
<tr>
<td>Deprived/Socio-Economic</td>
<td></td>
</tr>
</tbody>
</table>

Q4. How will consultation and engagement continue?

Consultation and engagement will continue to use the same methods as have been used previously. In addition, particular attention will also be given to the organisations identified as representing the equalities groups by the Council’s guidance. Where appropriate, we will tailor specific consultation exercises to increase engagement with those groups, to encourage their involvement in our work.

The changes to the planning system will see us working on a more local basis, within communities and neighbourhoods. This may encourage individuals and groups to get involved as our work will be more tightly focussed on their local area, and may feel more relevant to their life, when compared to the more strategic level work we have historically been involved with.

Q5. If there are gaps in your knowledge, are there any experts/relevant groups that can be contacted to get further views or evidence on these issues?

Yes [X] No

Please list them and explain how you will obtain their views:

The Council’s list of organisations who represent the equality groups can be contacted where necessary, along with any relevant groups that we already contact through our consultation database.

Q6. Is it important that further research is carried out?

Yes [X] No
Q7. What reasonable adjustments have already been made to address any adverse impact?

<table>
<thead>
<tr>
<th>Area</th>
<th>What adjustments have been made?</th>
<th>What further adjustments are required?</th>
</tr>
</thead>
<tbody>
<tr>
<td>No particular adjustments are identified as a consequence of any adverse impact on any group. Our consultations have always been accessible in a variety of formats and in various locations around the Borough, to ensure that anyone who might be interested in our documents are able to get involved and be engaged in the process.</td>
<td></td>
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</tr>
</tbody>
</table>

**STAGE 3 – DECISION**

The Development Plans team conducted an impact assessment of work covered by the team, through the Development Plans Service/Function, in October – December 2010.

The following was found:

- **An adverse impact, or a possibility of an adverse impact, was found in one or more areas**
- **No adverse impact was found, however more could be done to promote equality**
- **No adverse impact was found and equality is promoted**
- **Insufficient data was made available to make a judgement**

**STAGE 4 – RECOMMENDED ACTION PLAN**

<table>
<thead>
<tr>
<th>Issue to be addressed</th>
<th>Responsible officer</th>
<th>Action required</th>
<th>Timescale</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Contact details for organisations representing equality groups</td>
<td>Fiona Tarbit</td>
<td>Ensure contact details are kept up-to-date on ‘Limehouse’ consultation database, to ensure relevant groups are contacted</td>
<td>Ongoing, to ensure they are kept up-to-date</td>
<td></td>
</tr>
<tr>
<td>Tailored consultations</td>
<td>Fiona Tarbit</td>
<td>Consider at each future consultation stage whether more focused engagement/consultation work could be undertaken with specific groups to encourage involvement in our work</td>
<td>Ongoing, at various milestone stages</td>
<td></td>
</tr>
</tbody>
</table>

*This Equalities Impact Assessment was approved by the Assistant Director*

Date:
Equality Impact Assessment (Decision)
For the assessment we need to consider the impact of a key decision of policy and/or change.

Key Decision Title
Core Strategy

Date: November - February 2010
Author/Assessor: Fiona Tarbit

1. How the decision will be made and who else will be involved?
Council - Secretary of State for examination

2. What is the aim of this decision and what changes will occur? (A short statement about the area of assessment - its aim or objectives)
To ensure development in Milton Keynes is guided by effective policies supported by a robust evidence base which deliver sustainable development in sustainable communities with good quality of life and high standards of design.

3. Who is affected by this area of work and/or the changes? (The people it covers)
The Core Strategy has the potential to impact on everyone living, working or spending time in Milton Keynes because of the wide-ranging, strategic nature of the strategy

4. Does, or could, the area of work have an adverse effect or impact on members of the equality groups?

<table>
<thead>
<tr>
<th>AGE</th>
<th>Yes / Adverse</th>
<th>No / Neutral / Positive</th>
<th>X</th>
<th>Unclear</th>
</tr>
</thead>
</table>

The way our consultations are handled is increasingly web-based, which makes getting involved easier for many parts of the community. However, this might not be the case for older residents who may have less opportunity or wish to get involved in this way. To ensure that those without web-access are still able to engage with the process, we continue to write to consultees by letter (for those we do not have an email address for), make hard copies of documents available in the libraries (or we can send them to individuals on request) and advertise in newspapers and other forms of communication which do not rely on web-access alone.

The outcomes of our work help to encourage sustainable communities, ensuring that new developments enable easy access to local services, which would assist the older members of the community by ensuring the services they need to access can be reached on foot or by public transport. Our work also addresses the need for healthier and safer communities, and encourages flexible lifetime homes, meaning older residents should be more able to remain within their community.

Other ways in which the function provides benefits to people of certain age groups include providing work experience opportunities within the team for young people from the Borough, and regularly providing information to students undertaking projects/dissertations relating to planning in Milton Keynes. The Development Plans team also has increasingly strong links with the University Centre Milton Keynes, including supporting the growth of UCMK which will continue to provide opportunities to existing and future higher education students.
<table>
<thead>
<tr>
<th>DISABILITY</th>
<th>Yes / Adverse</th>
<th>No / Neutral / Positive</th>
<th>X</th>
<th>Unclear</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tbody>
</table>

As above, encouraging sustainable, healthy and safe communities, and flexible lifetime homes will help new developments to bring positive benefits to disabled members of the community.

Through our consultations, we endeavour to make accessible versions of our documents available on request (for example, large print or audio versions). Our electronic consultation documents are compatible with the screen reader technology used by blind and partially sighted users.

<table>
<thead>
<tr>
<th>RACE</th>
<th>Yes / Adverse</th>
<th>No / Neutral / Positive</th>
<th>X</th>
<th>Unclear</th>
</tr>
</thead>
<tbody>
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</table>

Alongside making documents available in alternative formats on request, we also offer to make our documents available in alternative languages which would make them more accessible to non-English speakers.

As discussed above, our work encourages healthy and safe communities: by reducing crime and the fear of crime, it may allow residents of all races to feel safer in their community and in the Borough as a whole.

<table>
<thead>
<tr>
<th>GENDER</th>
<th>Yes / Adverse</th>
<th>No / Neutral / Positive</th>
<th>X</th>
<th>Unclear</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tbody>
</table>

As with ‘Race’ above, encouraging healthy and safe communities may reduce the fear of crime for all members of the community, which may have particular benefits for women. Also, supporting improvements to the public transport system may also have positive benefits for women in particular, who are more likely than men to use public transport.

<table>
<thead>
<tr>
<th>SEXUAL ORIENTATION</th>
<th>Yes / Adverse</th>
<th>No / Neutral / Positive</th>
<th>X</th>
<th>Unclear</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tbody>
</table>

It is unlikely that our work will have any particular impact on the sexual orientation equality group as distinct from the rest of the general population. One possible area might be around encouraging safer communities, which, as above, could reduce fear of crime for individuals.

<table>
<thead>
<tr>
<th>RELIGION / BELIEF</th>
<th>Yes / Adverse</th>
<th>No / Neutral / Positive</th>
<th>X</th>
<th>Unclear</th>
</tr>
</thead>
<tbody>
<tr>
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</tbody>
</table>

As above, it is unlikely that the Development Plans function would have any specific impact on members of the community holding a particular religious belief as compared to the rest of the general population. However, as part of developing sustainable communities, we promote the provision of community facilities, which may be suitable for use by faith or religious groups.
Impacts on these groups are likely to be positive in many cases. One of the research elements the team is involved in is the Strategic Housing Market Assessment which assesses housing need in the Borough to inform our affordable housing requirements.

Our work also encourages economic development and jobs growth which may provide opportunities for members of this equality group. The function also encourages walkable neighbourhoods and improvements to public transport provision which will assist non-car owning households and individuals in accessing services and jobs.

Other parts of our work help to improve the environmental standards of construction. For example, increasing the energy efficiency of new homes will reduce heating costs for their residents and contributions to the Carbon Offset Fund allow the insulation and efficiency of older housing stock to be improved at a subsidised cost.

The Development Plans team also has a role in delivering regeneration in some of the more deprived areas of the city, which would improve quality of life and opportunities for the residents of these areas.

5. Who benefits – is there scope to advance equality for members of these groups?

<table>
<thead>
<tr>
<th>Group</th>
<th>Yes</th>
<th>No</th>
<th>Unclear</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Age</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
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<td></td>
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<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Deprived / Socio-Economic Disadvantage Groups</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

See comments made above to explain the broad relevant areas. The work of the Development Plans team aims to have benefits for all residents and visitors to Milton Keynes, rather than necessarily picking out specific target groups.

Consultation and engagement will continue to use the same methods as have been used previously. In addition, particular attention will also be given to the organisations identified as representing the equalities groups by the Council’s guidance. Where appropriate, we will tailor specific consultation exercises to increase engagement with those groups, to encourage their involvement in our work.

The changes to the planning system will see us working on a more local basis, within communities and neighbourhoods. This may encourage individuals and groups to get involved as our work will be more tightly focussed on their local area, and may feel more relevant to their life, when compared to the more strategic level work we have historically been involved with.
6. Are there any known gaps in knowledge related to this decision?

<table>
<thead>
<tr>
<th>Group</th>
<th>Yes</th>
<th>No</th>
<th>Unclear</th>
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</tr>
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In terms of the Core Strategy, there has also been some specific, focused engagement with equalities groups, including:
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For all forms of consultation, the responses received have been used to influence the next stage in the preparation of our planning documents, alongside other forms of evidence and information.
7. What is the actual/likely impact? (Identify the range of options and the effects on each)

It is considered that the nature of the work undertaken by the Core Strategy does not have any identifiable adverse impacts on the equality groups as distinct from the general population, and in many cases, the function provides the opportunity to create positive impacts for them.

Consideration is given when planning consultations to ensure that different people are not excluded from accessing information and engaging in the process, and positive steps are made in making information available in different formats on request, as discussed under Question 4. Through consultations contact has been made with specific groups and forums who represent these equality groups, for example through contacts in the Local Strategic Partnership, the Travellers Forum and the Milton Keynes Council for Voluntary Organisations. We also relied on the Town and Parish Councils (including those neighbouring the Borough) to disseminate information to residents in their parishes, to help spread awareness of our work.

All responses to consultations were considered individually and given equal weight to ensure all views are taken into account. We have undertaken and used research (for example, the Strategic Housing Market Assessment) to ensure we are aiming to deliver the correct mix of tenures and housing types to meet the needs of all parts of the community. Our documents are prepared to be in conformity with government guidance and best practice, and they help deliver the aims of the Sustainable Community Strategy which has been prepared with the needs of equality groups in mind.

The outcomes of our work (for example, the planning documents we prepare) are used to determine planning proposals, which in many cases will be subject to an Equalities Impact Assessment to consider if there are any specific issues that need particular attention.

8. Address the Impact

<table>
<thead>
<tr>
<th>No major Change Needed</th>
<th>Adjust the Policy</th>
<th>Continue the Policy</th>
<th>Stop and remove the Policy</th>
</tr>
</thead>
</table>

9. Outline the next steps (add an action plan if necessary) and when and how will this policy or decisions be reviewed (Include any mitigating work)

<table>
<thead>
<tr>
<th>Issue to be addressed</th>
<th>Responsible officer</th>
<th>Action required</th>
<th>Timescale</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Contact details for organisations representing equality groups</td>
<td>Fiona Tarbit</td>
<td>Ensure contact details are kept up-to-date on ‘Limehouse’ consultation database, to ensure relevant groups are contacted</td>
<td>Ongoing, to ensure they are kept up-to-date</td>
<td></td>
</tr>
<tr>
<td>Tailored consultations</td>
<td>Fiona Tarbit</td>
<td>Consider at each future consultation stage whether more focused engagement/consultation work could be undertaken with specific groups to encourage involvement in our work</td>
<td>Ongoing, at various milestone stages</td>
<td></td>
</tr>
</tbody>
</table>