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1 Introduction

This document reports on the comments received in response to the Plan:MK Topic Papers, published for consultation in September 2014.

What is Plan:MK?

Plan:MK will be the new Local Plan for Milton Keynes Borough. When adopted, Plan:MK will replace the existing Core Strategy (adopted in July 2013) and the remaining saved policies in the Milton Keynes Local Plan (adopted December 2005). It will set out a development strategy for Milton Keynes up to at least 2031, with a range of detailed policies to guide development over this period.

The Topic Papers

The first stage of engagement in the preparation of Plan:MK was consultation on a series of twelve Topic Papers. The papers covered a wide range of topics, under the following headings:

- Growth in Housing
- Employment and Economic Development
- Town Centres and Retail
- Transport and Travel
- Rural Issues
- Provision of Physical and Social Infrastructure
- Quality of Place
- Culture, Recreation and Quality of Life
- Open Space and the Natural Environment
- Climate Change and Sustainability
- Duty to Cooperate

Purpose of the Topic Papers consultation

The aim of the papers was to engage stakeholders in the future growth and development of Milton Keynes in the preparation of Plan:MK. The papers covered a range of topics, sometimes interlinked, which the Council had identified as being key to the development of the Plan.

Each paper summarised the background to the topic, setting out data and policy context, before highlighting key issues and posing questions for the reader. This document brings together a summary of the comments received in response to those questions and the issues raised by the papers.

Consultation period

Consultation on the Topic Papers ran for a twelve-week period between Wednesday 10th September and Wednesday 5th December 2014. The Development Plans team led a comprehensive engagement programme on the Topic Papers, including hosting a series of public drop-in sessions at a pop-up shop in the city centre and in other places around the Borough. A full Consultation Statement will be made available which will detail all of the methods used in the Topic Paper consultation period.
Comments Received

In total, around 2,000 responses were received from more than 260 organisations and individuals. The responses were varied in length and detail. Some people responded directly to the questions posed in the Topic Papers and phrased their comments accordingly, whereas others made more comprehensive responses, and attached evidence or details of a site they are promoting through the planning process.

All the comments received to the Topic Papers consultation are available to view through our online consultation portal, at http://miltonkeynes-consult.objective.co.uk/portal/planmk. This document however summarises the key points that were raised, in a more accessible format. Inevitably, due to the number of responses, the level of detail of those responses and the wide range of issues that they cover, this report is still quite long. However, the comments have been split up by Topic Paper, and by question within each paper, so you can refer to the areas of interest to you more easily.

Generally, the organisation or stakeholder who made the comments has not been disclosed within this report, since in many cases, the comment was made by several respondents but with a slightly different wording or emphasis. The detail of ‘who said what’ is available to view on the online portal, with the full comments received included.

Please note, there are many acronyms and abbreviations used throughout this document. For clarity, there is a list at the end of the document that includes the term in full.

How the comments will be used

As we progress with the preparation of Plan:MK, the full responses to the Topic Papers will help us to develop the detail of the policy areas that the plan will cover. Please note, we will refer to the full content of what respondents said, not just the summarised key points, so the finer detail of the responses will not be lost.

The issues raised by the papers are the sorts of topics that will need to be addressed in Plan:MK, and the views of stakeholders, the information we gather through various studies and reports that form the background evidence to the plan, and the approaches laid down in the National Planning Policy Framework and the Planning Policy Guidance, will help us decide on policy directions moving forward.

This report does not give any sort of view on what stakeholders and consultees have said in these responses, or consider what policy approach will be taken forward in the light of the comments received.
2 Growth in Housing

Summary

This Topic Paper covered issues related to the level and type of housing to be provided through Plan:MK. It picked up issues relating to the overall housing target, the impact of economic growth on housing need, housing mix and the provision of specialist housing, including affordable housing. 268 responses were received from 61 individuals and organisations.

There were a number of key themes running through the consultation responses, although many respondents raised slightly different issues in putting their positions forward.

As far as possible, the question by question summaries below start with the issue on which there was most consensus. However, in the majority of cases, although there were general themes emerging, many respondents put forward differing positions or cases. Therefore, the summaries are best seen as an overview of the points made. In some cases there are directly conflicting opinions put forward by respondents in the same category; both are summarised.

Some of the key points to be aware of are:

- There is a conflict between the development industry and others on how many homes we should be planning for - the development industry suggesting a higher figure is needed, whilst the others would like to see a lower level of housing provided.
- The development industry believes the economic growth potential of Milton Keynes will require a significant increase in the housing target, many advocating a target for the Borough well in excess of 2,000 homes per year.
- There was concern from those outside the development industry as to the deliverability of a housing target higher than the Core Strategy, including infrastructure and market concerns.
- General feeling that the level of affordable housing provided needs to increase - with some of the development industry suggesting this justifies a higher overall target.
- General desire outside the development industry to see an increase from the 30% target, with the development industry flagging up concerns regarding viability and the delivery of sustainable communities.
- No real support for different affordable housing policies for different areas of the Borough, but recognition that there does need to be some flexibility in the approach to delivery.
- The need to work more closely with our neighbouring authorities to deliver coherent plans was a concern.
- The requirement to consider unmet need from London and Luton was raised. Members of the public and Parish/Town Council’s flagged up that they felt we should only be supporting the needs of other areas if there are benefits for Milton Keynes.
- The development industry largely believed that there is enough suitable land in Milton Keynes for us to be able to meet our own housing needs in the Borough, without looking to our neighbours.
- General agreement that a mix of housing types/sizes is needed across the Borough, but no agreement on whether a policy on mix is needed, or whether sites for small or executive homes should be identified in the Plan.
General recognition outside the development industry that there is a need to deliver small properties. Flagged up that it needs to be considered who these properties are for (e.g. both old and young) as there will be differing requirements in terms of property type, design and location.

Recognition of the importance of providing specialist housing, but no consensus as to the best approach.

The need to provide more bungalows rather than flats for the elderly was a concern of several members of the public. Practicalities with, and running costs of, flats were mentioned as concerns.

Limited comments made of gypsy and traveller/travelling show people provision, but general support for the SHMA (Strategic Housing Market Assessment) conclusions. However, there was some concern that there may be ‘hidden need’ that has yet to be identified.

Overall Comments

These comments were made on the provision of housing in general and are not related to a specific question in the paper.

What members of the public said:

- Housing target needs to be realistic. Need to learn from the past.
- Maintain employment sites in villages - don’t need more housing
- Build existing permissions first

What Town and Parish Councils said:

- Can the Council take steps to ensure delivery of existing sites before planning for more?
- Need to consider quality not just quantity.
- Need to recognise that the rural lifestyle offered by areas around MK will mean people will continue to commute into MK

What Ward Councillors said:

- Housing issue is technical - difficult for the lay person to understand.
- Need to consider housing need in relation to existing communities - managing impact is a challenge.

What the industry said (e.g. landowners, developers, agents...):

- Support growth in housing.
- Plan won’t be positively prepared unless it plans for more homes to support economic growth.
- Not consistent with national policy unless target supports economic growth
- Plan isn’t effective as it doesn’t support delivery across the wider area.
- Need to ensure growth is reflected in provision of other facilities and services.
- Need to align plan with that of Aylesbury Vale District Council (AVDC).

What national/statutory organisations said:

- Highway Agency supports evidence led approach to identifying housing need.
Question 1: SHMA and Housing Need

- Do you have any views on the conclusions of the SHMA, particularly in relation to the assumptions regarding demographic change and migration?
- Do you have any thoughts on how need across the MK HMA is being established?
- Does it give a robust outcome?

What members of the public said:

- 1,650 dwellings per annum (dpa) conclusion seems broadly okay
- Haven’t met targets recently despite sufficient land - the market doesn’t work.
- Needs to consider reducing the target if there is not sufficient suitable land.

What Town and Parish Councils said:

- No reason to adjust the figure from 1,650 dpa
- Too much reliance on past trends - need to consider skills and infrastructure in an area and how much it can take.
- Lower target would be more deliverable and avoid planning by appeal.
- No need to work with Central Bedfordshire as they are meeting their own need. Any need in MK should be met east of the M1, not in Central Beds.
- Need to include Parish Councils in any MOU (Memorandum of Understanding) regarding the delivery of sites - responsible for a number of services.
- Any shortfall in rural land should not be made up in the city.
- Is 1,650 enough? Need to consider increasing migration from London and need to maintain our new generations and the ageing population.

What Ward Councillors said:

- Concern that by building on trends we are simply building more of the same.
- Circular ‘target fulfilment’ approach where housing figure gives the jobs figure which is used to justify the housing figure.
- Should base housing figure on targets for who we want to attract to MK based on our community and economic strategy for the area.

What Milton Keynes Council departments said:

- Need to consider provision of infrastructure needed to support such levels of growth

What neighbouring and other local authorities said:

- Need to explain why figure of 1,750 dpa is being referred to when the SHMA says 1,650 pa
- Agreement that part of MK HMA is likely to cover the north of AVDC - but this needs to be formally agreed.
- Agreement that MK HMA extends into Central Bedfordshire.
- Need to get formal agreement with other Local Authorities as to the approach to HMAs, particularly where they may overlap.
- Will need to update figures based on updated 2012 SNPP (sub-national population projections) and soon to be published household projections.
Need to set out simply the assumptions that underpin the SHMA conclusions

Figures in Figure 1 ‘Estimate of Housing Need across the wider Milton Keynes Housing Market Area’ (2,200 across the wider area) is a good starting point.

Need to reflect updated work on HMAs

Clear need to work with AVDC and Central Beds

Need in Central Beds is 230 pa not 280 pa as written.

5,410 homes planned in the Central Beds are of the MK HMA. More than meets the requirement.

When considering future directions of growth, need to take into account development already planned in the eastern area of the HMA. 1,650 dpa is the absolute maximum that is realistic and deliverable.

What the industry said (e.g. landowners, developers, agents...):

The housing figure in the SHMA is too low. Various figures given based on differing approaches to SHMAs, with various reasons why the target was too low.

Suggested alternative targets are set out under Question 7.

Reasons why the target is too low:

- Employment growth will drive the need for more homes
- Will not deliver sufficient affordable housing at 35% to meet the need
- No allowance has been made from increasing out-commuting from London
- Need to consider that migration will change - dependent on other factors (economic growth, commuting patterns etc...) - likely to be higher
- No allowance has been made for the increased economic benefits of east west rail - an opportunity to cut out commuting to London.
- Last assessment put need a 3,280 dpa - what has changed?
- Assumptions on future migration are too low. Should be based on ONS projections.
- Government population forecasts are recession based - this needs to be considered.
- Target should be above past completions to 'significantly boost supply'
- Need to consider unmet need from Luton and London (Nathaniel Lichfield Partners ‘London’s Unmet Housing Need report suggests an extra 3,008 - 9,169 homes for MK).
- SHMA is not NPPF compliant.

Other issues:

- The need to provide affordable housing should drive a higher target.
- Need in Central Beds/AVDC has been underestimated.
- HMA should cover wider area including Luton and Bedford.
- Current assumptions for wider HMA are not robust as they are based on estimation and don’t consider employment led requirements or market trends - need to do more work in this area.
- Conclusions on the amount of need in the AVDC area of the HMA are flawed as this area has been constrained by past policy.
- 1,650 seems low compared to the Core Strategy housing target, which hasn’t been delivered - where has the need gone?
- Need to ensure SHMA is updated when new population projections are published.
- Given timing of plans, consider commissioning further joint work with other authorities.
• Need to clearly set out the assumptions that underpin the SHMA conclusions
• Troubling that the SHMA conclusions is so much lower than in 2008. Evidence needs to be credible.
• Figures in the SHMA are out of date (i.e. new Census data)

Some (limited) support for the target:

• 1,650 conclusion seems appropriate given Government Household Projections (1,620 dpa) and ‘How Many Homes Where’ calculation (1,616 dpa)

What local organisations/interest groups said:

• Use SHMA figure of 1,650 dpa otherwise what is the purpose of an objective assessment.
• Lower target would be more deliverable and avoid planning by appeal.
• No need to work with Central Beds as they are meeting their own need. Any need in MK should be met east of the M1, not in Central Beds

Question 2: Market Signals

• Do the development statistics suggest we should be adding an ‘upwards adjustment’ to the DCLG household projections?
• Are there any other statistics on completions and rates of development we should be taking into consideration?

What members of the public said:

• No uplift supported

What Town and Parish Councils said:

Is uplift needed?

• No - need to consider that completions in MK have rarely exceeded 2,000 homes per year - unlikely to change.
• No need for an uplift - MK has outperformed other areas.
• No need for an uplift - mortgage availability is still a bottleneck.
• Need to ensure homes are provided to encourage the young to stay - prevent them moving north to cheaper homes

Other sources of information

• Look at mix of properties - need to avoid an oversupply of smaller properties.
• Level of brownfield development - would support an increase to support economic growth in older towns.

What Ward Councillors said:

• Statistics reflect the market, not what planners do.
• Limit to the capacity of house builders to deliver locally (1,500-1,700). Is there extra capacity in local house builders?
What Milton Keynes Council departments said:

- Evidence suggests no uplift is needed

What the industry said (e.g. landowners, developers, agents...):

Is an uplift needed?

- Signals listed suggest an uplift is needed/essential
- Overcrowding suggests an uplift is needed.
- Past completion rates below requirements - need to increase target accordingly.
- Concern over reliance on past delivery rates - need to look at future household formation.
- Essential to add an uplift based on pent up demand - past requirements have not been met.
- Need to consider that demand might not be realisable now but could be over the plan period.
- Past undersupply of housing not always the fault of the Council - more land supply from different parties would help.
- Yes, lower quartile rents higher than the national average (high demand vs low supply)
- Yes, as relatively high supply has not resulted in prices falling. House price rise between 1997 and 2012 was higher than the national average (215% compared to 206%)
- Affordability everywhere shows a need to plan for more homes

Other sources of information

- Need to look at mix adjusted house prices - not average.
- Concealed households - MK has the worst rate across the HMA. 50% likely to be individuals.
- Statistics on economic growth show a need for more housing to support growth.
- Consider stats from Census, National House Building Council, ONS and the HCA database.
- Levels of buy to let homes and an examination of the impact on the provision of homes.
- Number of homes built in MK as a proportion of national total - falling
- Need to look back over a longer period of time.

What local organisations/interest groups said:

- No reason to suggest an uplift is needed.
- Need to consider amount of banked land where there is no reason why it hasn’t been developed.
**Question 3: Affordability**

- What do you think the data on completions, house prices, rents and affordability tells us about housing need?
- Do you think it requires an upwards adjustment from the DCLG housing requirement?
- Is there any other data we should be taking into consideration?

**What members of the public said:**

- Changes in house prices show MK not driven by local completion rates but the wider economy.
- Nonsense to suggest house builders will help to bring prices down - if prices decrease they will slow production to maintain price point.
- Significant Government investment hasn’t solved problems - just a short term fix.
- Need more analysis of the role of the private rented sector. Why is there a high turnover which is affecting communities?

**What Town and Parish Councils said:**

- Estimates are about right.
- Too much supply will constrain demand and limit commitment from house builders and developers.
- Level of overcrowding is interesting - shows pressure on families finding suitable accommodation.
- Increase in private renting. Need more 2 and 3 bed houses (not flats) as they are cheaper to buy and run.

**What Ward Councillors said:**

- Need to have the absolute figures for house prices and earrings on a like for like basis.
- Should have vision and aspiration to set our targets, not look at need.

**What Milton Keynes Council departments said:**

- Low earners struggle to afford by buy/rent homes, particularly smaller properties. Suggest concentrating on the mix.

**What neighbouring and other local authorities said:**

- Need to consider that interest rate rises will have a negative impact on the housing market.

**What the industry said (e.g. landowners, developers, agents...):**

- Need an upwards adjustment to improve affordability generally across the whole country.
- Need to take into account past shortfall which has led to a lack of affordable housing supply and higher prices.
Need to take into account wider socio-economic issues - housing waiting lists, numbers in B&B, those in sub-standard homes/fuel poverty - all continue to grow because of a lack of affordable housing.

Overall need for affordable housing is significant - current target at 35% would deliver less than half of the need. Need to increase the target.

Data shows a particular need for 1 bed properties - need to consider who these are for (e.g. elderly)

Need to investigate the reasons why household formation rates have slowed since 2001.

What local organisations/interest groups said:

- No need for an upward adjustment.
- Supply vs demand is about right. Prices compare well despite low recent completion rates.

**Question 4: Economic led projections and the wider HMA**

- Are there any other specific strategic issues relating to housing that you think we should be addressing with other authorities under the duty to cooperate?
- How do you think the level economic growth of Milton Keynes affects the level of housing we should be planning for in the Borough?
- Do you agree with the initial conclusions that 2,200 homes per year should be planned across the wider HMA is broadly in balance with likely job growth?
- Do you think the data and forecasts suggest the need to vary the housing figure for the Borough from the DCLG projections?

What Town and Parish Councils said:

- Improvements to road and rail will lead to increasing commuting, so people may not live in MK.
- 2,200 at the top end of what should be planned.
- Economic growth may not correlate with employment due to moves towards automation.
- Need to consider the impact of in/out commuting on the local infrastructure.
- Consider job losses as well as growth. Don’t rely on business start-ups.
- Place a completion bond on developers to ensure development happens in a fragile market.

What Ward Councillors said:

- Need to consider that people will travel around the region to different jobs without moving home.
- Mix suggests developers 'play safe' rather than considering the economy - need to attract people with the housing on offer.
- 2,200 figure has no justification as it is based on past trends - need to plan a target on what we want, not base the future on forecasts.

What Milton Keynes Council departments said:
2 Growth in Housing

- Growth of university may put pressure on housing need.
- Infrastructure improvements could support economic growth and lead to increased in and out commuting.
- Strong economic growth will need a strong supply of housing to support this.
- 2,200 dpa seems appropriate - but need to consider an adjustment to support economic growth.
- Need to consider a risk analysis of future trends and an appropriate buffer.

What neighbouring and other local authorities said:

- Need for more joint working to establish that the 2,200 figure is appropriate.
- Need to base thinking on outcome of the EGELS (Economic Growth and Employment Land Study).
- Do not accept that trends should be projected forward - need to have regard to other local strategies.
- Need to be clear that SHMAs all work together and there are no gaps.
- Need to recognise that relationship with South Northants has a knock on impacts on Northampton not just in terms of housing but also jobs and retail.
- Northampton is cheaper than MK - likely to attract people who work in MK.
- Agree that there is a gap between jobs and homes that other areas can help fill. But MK should be providing more affordable housing to help and working to improve skills and career prospects.
- Premature to say that AVDC will be producing excess workers at this stage. Cannot assume this will be agreed - needs to be dealt with through the DtC (Duty to Cooperate).

What the industry said (e.g. landowners, developers, agents...):

- Economic projections should only increase the housing requirement.
- Right that MK should continue to be the focus of growth.
- Need to base conclusions on future need on the conclusions of the EGELS - should consider that the future will be different as the global recovery continues.
- MK will continue to draw labour from other areas due to nature and choice of employment, and shortfall in local workforce.
- Need to ignore local authority boundaries and improve relationships with other areas to co-ordinate a vision for the economy, housing and infrastructure. Clear economic relationship with AVDC and Central Beds
- Need to consider jobs growth in the HMA outside MK, which has not been taken into account.
- Need to do more population analysis of the number of homes to support jobs growth - not use a ratio.
- Not to plan to support economic growth would only exacerbate commuting patterns.
- Already pressure on existing families to find homes near family/work due to lack of supply, particularly in affordable housing.
- Lack of housing would harm GVA (Gross Value Added) which would affect resident’s quality of life.
- Need to consider the transport implications and costs of not meeting OAN (Objectively Assessed Need) (e.g. to support increase commuting).
- Growth needs of the city should be met in the authority area.
- Need to factor in the benefits of East West Rail.
2 Growth in Housing

- Even maintaining existing commuting patterns, the number of homes needed to support economic growth has been underestimated.
- Need to ensure SHMAs are consistent and can be summed.

What local organisations/interest groups said:

- Believe that 1,650 homes as per the SHMA is adequate.
- Don’t agree that Milton Keynes should be planning across boarders unless neighbours agree.
- No need for an upwards adjustment.

**Question 5: Need from other areas**

- Should MKC be considering supporting any unmet need from other areas?
- If so, where and what is the evidence for this?
- Do you think there are likely to be any issues with the deliverability of the housing numbers suggested in this paper that would lead to MKC needing to approach other authorities for support?
- If so, where is the evidence for this?

What members of the public said:

- No benefit to support other areas without considerable Government investment. Already a £72.5m shortfall in funding for critical infrastructure to 2026 cannot be ignored.
- Need to consider an increasing in-migration from London due to decreasing affordability.
- Should plan for the highest level of growth deliverable.

What Town and Parish Councils said:

- No more than we need - unless it comes with benefits for Milton Keynes.
- Only issue with providing more would be the lack of interest from developers.
- Existing sites should be able to meet the need from other areas.
- Each authority should plan for its own needs concentrate on meeting our own needs first.

What Ward Councillors said:

- We should be planning for appropriate housing so people want to live in Milton Keynes and not neighbouring areas.

What Milton Keynes Council departments said:

- Only consider supporting unmet need from elsewhere if it can be delivered sustainably.
- Work under the DtC needs to ensure the plan across the wider area meets economic development needs.

What neighbouring and other local authorities said:
Flag up that as an adjoining HMA, if we cannot accommodate our own need we would seek to discuss to see if MK could potentially help (Wycombe).

AVDC trying to provide for more of its economically driven need to cut out-commuting.

AVDC not yet in a position to know if there is any unmet need.

AVDC do not believe they should be providing some of the housing need related to the economic growth of Milton Keynes.

What the industry said (e.g. landowners, developers, agents...):

- Core Strategy Inspector and Inspector of the VALP (Vale of Aylesbury Plan) highlighted the deficiencies in cross boundary working. Work needs to be undertaken to establish if there is unmet need and how it can be met across the wider area.
- Long recognised that MK cannot meet all of its own development needs. Should be approaching neighbours for support, emphasising the role of MK as the provider for the jobs and higher order services on which these authorities rely.
- Likely to be unmet need from MK that needs to be provided elsewhere. Need to address under the DtC.
- Strategic growth of MK and its hinterland needs to be planned to ensure it is sustainable
- Consider that MK should be able to meet all of its own needs. A higher figure would be deliverable given the market capacity and the lack of constraints.
- No concern that MK could meet figures set out in the Topic Paper - it has done so before.
- If land is available, MK should meet its own need.
- Need should be met in MK where it is most sustainable. Strong history of delivery in MK so should be the focus for wider need.
- Should not plan to meet the needs of other authorities.

Unmet need?

- Likely to be unmet need from other area that should be accommodated.

London

- Need to consider the ‘London letter’ advising authorities to take into account uncertainties around London’s need.
- Need to consider the NLP report on London’s unmet need. Suggests 3,008 - 9,169 additional homes for MK.

Other areas

- Need to work with Luton who cannot meet their needs.

What local organisations/interest groups said:

- No - Central Beds are meeting all of their own need.
- MK should meet it’s own need - more than 50% of the Borough is east of the M1 and is unconstrained
Question 6: Options

- Which option is most appropriate? (DCLG household projections, SHMA figure, upwards adjustment to support workforce across HMA, plan for all workforce increase)?
- Are there any options we should be considering?

What members of the public said:
- Need to plan to meet need - but only if funding available to support growth. Need to put MK residents above Government targets.

What Town and Parish Councils said:
- Plan for the figure in the SHMA.
- Plan for 95% of need, recognising there will always be periods of boom and bust.

What Ward Councillors said:
- Need to plan for who we want to attract, not look at need.
- Need to keep as many workers in MK as possible - increased in-commuting will be a failure. Need to attract commuters from London to spend their money in MK.

What Milton Keynes Council departments said:
- Need to consider all the signals - may suggest an upwards adjustment is needed.

What the industry said (e.g. landowners, developers, agents...):
- Need to add an upwards adjustment from the SHMA/DCLG figure. They are just a starting point.
- Cannot agree figure until future job growth is established - should update SHMA once this is done. Consider the SEMLEP Economic Plan.
- Need an uplift to accommodate increased migration from London.
- Need an uplift due to market signals (esp. affordable housing provision and overcrowding).
- Accept that growth is employment led and not realistic to meet all need in the Borough - but should be within the zone of influence.
- MK and AVDC are relatively unconstrained and well-located to meet future economic growth. Need to work together to realise this.
- Need to base target on higher rates of economic growth - past rates held back by the recession.
- Any target should be seen as a minimum and further delivery encouraged.
- Sensible to consider market signals, but need to consider it may suggest a downward adjustment.

What local organisations/interest groups said:

Plan for need in the SHMA
Question 7: Housing figure

Considering the context provided, what do you think the housing figure in Plan:MK should be?

What members of the public said:

- 1,600 dpa, dependent on sufficient suitable land being available. Too much emphasis on continuing population growth.

What Town and Parish Councils said:

- Use the SHMA figure.
- Target of 1,500 for MK, 2,100 for HMA
- 2,200 dpa seems reasonable, but it’s not deliverable.
- Targets are unrealistic unless there are infrastructure, services and jobs.

What Ward Councillors said:

- 1,500-1,750 pa -but need to support the house building industry to improve mix.
- Prefer to aim for higher numbers, but problems with delivery mean we should plan for 1,750
- Strongly encourage any initiatives to encourage affordable housing as a part of the overall total.
- Support a possible interim review of the existing housing target to take into account of economic or legislative changes before next plan is due.

What Milton Keynes Council departments said:

- Continue with the Core Strategy target.

What the industry said (e.g. landowners, developers, agents...):

Various housing targets given:

- Minimum of 1,750pa, but with an upwards adjustment to support economic growth.
- 2,163 dpa in the Borough - may be additional need identified through the DtC.
- 2,225 plus 550 in wider HMA.
- 2,275 pa for Milton Keynes - but this will not provide all affordable housing need.
- 2,359 pa based on supporting economic growth whilst maintaining commuting patterns.
- 2,359 dpa for MK - but if this is not deliverable, it should be found in neighbouring areas.
- Minimum of 2,500 units.

Other points:

- Need to ensure the DtC is satisfied in establishing the target.
- Inadequate level of analysis has been undertaken on what is a key issue.
- Need further refinement - figure should be revised annually.
- Need to include a buffer to allow flexibility.
What local organisations/interest groups said:

- Target should be 1,650 pa

**Question 8: Housing mix**

- Should there be a prescriptive policy on mix, maybe linked to the SHMA?
- How do you think the need for smaller properties should be addressed?
- Should the Council be looking to identify sites where a higher concentration of smaller properties could be provided?
- How could the Council increase the provision of smaller properties to support economic development aspirations?
- Should it be considering identifying specific sites for the purpose of executive housing? If so, where?

What members of the public said:

- Need a policy on mix, cannot leave it to the market.
- Smaller, older households will need more flats - need to learn design lessons
- Need to encourage mix of developers and innovative types of development (e.g. co-operatives).
- Need minimum space standards.

What Town and Parish Councils said:

- All areas should have a mix of housing.
- Large sites should have a mix.
- No need to deviate from policy of mix across all sites.
- May need policies for areas that currently don’t have a mix.
- Need a policy on mix to meet local needs.
- Need a policy on mix - cannot rely on a market driven by profit.
- Need to consider who will need smaller properties (i.e. young and old will need different types of accommodation)
- Need to provide sites for executive housing, but provide funding for affordable housing elsewhere.
- Controversial to allocate sites just for executive housing.
- Look for higher density housing on brownfield sites near older centres.
- Any executive housing can be further away from services and infrastructure, as people will drive anyway.

What Ward Councillors said:

- Need variation in housing that caters for all tastes.
- Imperative that we build bigger homes to stop people travelling elsewhere
- Not a credible city with so many 1 and 2 bed properties - need 10% 5+ bed plus properties.
- Need minimum internal space standards.

What Milton Keynes Council departments said:
• Need to consider a policy on mix to ensure small properties are delivered.
• Look for smaller properties in regeneration areas and rural areas to assist with affordability.
• Site allocations just for executive housing would move away from the original principle of mix across the city.
• Policy on mix could mean the needs of individual areas are not addressed - suggest a policy of density.
• Executive housing could be provided in low density areas, if demand can be demonstrated.

What the industry said (e.g. landowners, developers, agents…):
• Market forces will dictate an appropriate mix.
• No need for policy on smaller properties - some people who ‘need’ small homes can afford larger properties.
• Would be willing to help support the delivery of the SHMA mix.
• Seek opportunities for executive housing, even as part of larger settlements.
• Need to consider the contribution existing properties can make to the need for small, affordable accommodation, in the form of HiMOs (Houses in Multiple Occupation).
• Number of overcrowded homes shows the pressure in the market.
• Increase in private renting shows the acceptance that this can meet affordable housing need.
• Small property rents show a demand for small accommodation.
• Need to consider needs of students.
• Need to encourage the provision of smaller properties.
• A policy on mix would go against Government policy.
• Can’t link to SHMA requirements - they will go out of date.
• Provide small homes in big urban extensions where a mix of housing can be provided.
• Having a policy on mix does not provide flexibility.
• No need to provide sites for executive housing.
• Too many other factors that effect on site provision (location, accessibility etc...) for a policy on mix to work.
• Need to consider they type of property that is needed, not just the number of bedrooms. For example, need grouped bungalows in central areas to cater for older people downsizing.
• Need to reconcile any policy with issues of viability.

What local organisations/interest groups said:
• No policy on mix but SHMA should be considered as a guide.
• Small site’s should be used for small properties - large properties should be part of the mix on larger sites.
Question 9 – Affordable housing requirements

- Do you agree with the SHMA conclusion that the affordable housing target should be set at 35% of a housing target of 1,750 homes per year?
- If not, how do you think the affordable housing target should be adjusted?
- Should the Local Plan threshold for affordable housing remain at 15 or more units?
- Do you have any views on how to provide flexibility in the application of planning obligations policies?
- Should affordable housing be seen as a priority above other sources of infrastructure?
- Should there be different affordable housing targets for different parts of the Borough based on viability?

What members of the public said:

- A split of 50% private/50% public would be about right, in line with the original plan for MK.
- No intervention at a local level will solve the national housing issues.

What Town and Parish Councils said:

- Agree the target should increase to 35%.
- 35% a minimum - should consider 40%.
- Prices will increase over time so need to consider increasing to 45% to ensure young can get a home.
- Lower the threshold.
- Require financial contributions to enable off site provision.
- Consider a flexible approach - sites for affordable housing wouldn’t be a bad thing.
- Target should be 10% - this is achievable and affordable.
- Need a mix of housing in all areas so be prescriptive about what is needed in different areas.

What Ward Councillors said:

- Affordable housing is a priority. Should be seeking a higher requirement.
- Can’t rely on SHMA conclusions - it has circular arguments.
- In cases of viability issues, any decision on how to spend s106 funding needs to be a DCC decision - affordable housing shouldn’t automatically be the priority.
- Raising the target to 35% ASAP is a priority.
- Recognise viability is an issue.
- Threshold should be reduced from 15.

What Milton Keynes Council departments said:

- 35% seems reasonable.
- Threshold of 15 units seems reasonable.
- Need to have flexibility - but any policy on flexibility would need to be carefully explained.
Having priorities as part of Section 106 negotiations seems like a good idea. Giving a preference to affordable housing over other requirements would not lead to sustainable communities. Affordable housing should be seen as a priority. No targets for different areas. Reserve sites could be used to provide affordable housing in areas where it is needed.

What the industry said (e.g. landowners, developers, agents...):

- No need for an area by area policy if you have a flexible approach to affordable housing.
- Need to get the overall target right first before establishing a percentage. Not all issues have been considered in establishing the total target.
- Any target needs to be subject to site specific viability and is dependent on the approach to CIL. Affordable housing has a major impact on development viability.
- 35% doesn’t seem unreasonable.
- Threshold should stay at 15 units.
- The threshold should be reduced - smaller sites are more viable.
- Support a flat rate across the Borough.
- Need to provide a flexible approach to affordable housing, particularly if a CIL (Community Infrastructure Levy) charge is introduced.
- SHMA target is not robust as it calculates total need then extracts market need, rather than properly assessing affordable need.
- Affordable housing is a priority, but it needs to be balanced with the provision of other essential infrastructure.
- Need to review target over time.
- Need to make sure affordable housing is provided across the city.

What local organisations/interest groups said:

- 25% okay but there needs to be a mix of tenures.
- Threshold should be reduced to 10 or more.
- Need strict policies if a flexible approach is to be taken to s106 provision.
- No need for different targets for different areas.
- Need to consider the impact of increasing affordable housing provision on the delivery of other infrastructure, including open space.
Question 10 - Specialist housing

- Do you agree that reserve sites remain the most appropriate locations to meet specialist housing needs across the city or do you think there is a more appropriate alternative way of enabling delivery?
- Should the Council be looking to allocate specific sites for extracare provision? If so, where would this be appropriate?
- Would you support a more flexible approach to land use designations to support the delivery of specialist housing in appropriate locations?
- Do you have any views on how the Council can best support the delivery of additional bungalows and specialist homes needed by the ageing population?
- Are you aware of any particular housing need that is not specifically set out above?

What members of the public said:

- Strongly support the provision of a dedicated complex for bungalows for the elderly - extracare is only one solution.
- Bungalows needed for the elderly - flats are too costly and problematic. Need communal garden space for interaction.
- Council housing and lifetime homes should be considered as standard - not specialist.
- Need to investigate the need for specialist housing in more detail.

What Town and Parish Councils said:

- Need specific sites for elderly accommodation.
- Reserve sites remain a good policy
- Any extracare should be in tranquil areas on the edge of the city.
- Support more flexible land use.
- Look at innovative solutions - layered concourses rather than bungalows.
- Bungalows difficult to deliver. Consider retaining ground floor flats for the elderly.
- Other types of housing that need to be considered:
  - Care homes
  - Drug/alcohol rehabilitation
  - Integrated housing for ethnic communities

What Ward Councillors said:

- Need accommodation for the elderly in all areas so they can stay within their communities.

What Milton Keynes Council departments said:

- Seek to provide specialist housing within communities, including any extracare.
- Should be considering a more flexible approach to land use
- Reserves sites are not the only answer to specialist provision - e.g. of former garage site being bought forward for wheelchair homes.
• Need to discuss the need for extracare with Social Care team - but suggest looking for sites would be prudent.
• Reserve sites provide well for specialist needs but need to remove the ‘preferred use’ as this is confusing.
• All homes should be built to lifetime homes.
  • Other types of specialist housing to consider:
  • Shortfall in wheelchair accessible homes of around 90 homes using the ‘Mind the Step’ methodology
  • Self-build
  • University students
  • Looked after children

What the industry said (e.g. landowners, developers, agents...):
• A flexible approach is needed to delivering specialist housing
• Look at specific sites for specialist provision.
• Large scale developments should be able to meet all needs.
• Extracare should be near to facilities.
• Support the use of reserve sites for specialist housing.

What local organisations/interest groups said:
• Whatever approach is taken with care homes, need to ensure provision remains for D1 use - prefer fewer, larger units.

**Question 11- Gypsy and Traveller provision**
• Do you agree with the analysis of future provision of gypsy and traveller need set out in the SHMA? If not, why?
• Do you agree that it is appropriate to carry forward the existing allocations and there is no need to allocate any new sites to meet the needs of Gypsies and Travellers and Travelling Showpeople?
• Do you agree that it is logical to have a criteria based policy to consider any application for future Gypsy and Traveller/Travelling Showpeople provision?
• In developing such a policy, what issues does MKC need to consider?

What members of the public said:
• There is limited money, need to make difficult decisions to spend it on those most in need on the housing waiting list - not possible to provide for everyone.

What Town and Parish Councils said:
• Agree with the assessment - need to plan to meet need, but recognise that things are changing.
• Suggest that any sites that aren’t taken up in a timely manner are used instead for affordable housing.
What Milton Keynes Council departments said:

- Need to do more to look at concealed households - likely to be additional hidden need.
- Need to ensure there are deliverable sites - existing Local Plan sites have yet to come forward.
- Agree with the conclusions of the SHMA.
- In planning for any new sites, need to consider the impact on existing residents and the impact of a transient community.

What the industry said (e.g. landowners, developers, agents...):

- Figures seem reasonable.
- Need to consider amenity of surrounding sites in planning for new provision.

What local organisations/interest groups said:

- Need to plan to meet need.
- Expanding existing facilities is the best approach.
3 Employment and Economic Development

Summary

This Topic Paper covered employment issues including what planning policies were needed to meet the needs of business and support an economy fit for the 21st Century; the planning policies needed to support the growth of Central Milton Keynes (CMK), micro and small businesses and home working; whether restrictions should be relaxed to enable places of worship to be set up on industrial estates; if additional employment land should be allocated and where including for warehousing. The final question sought views on if there were any other employment issues that had not been addressed in the Topic Paper.

A total of 117 responses were received from 39 individuals and organisations.

On the question of how Milton Keynes Council should plan pro-actively to meet the development needs of Business and support an economy fit for the 21st century, there was support for the Council taking a lead and pro-actively planning to meet business needs and grow the economy capitalising on the strengths of Milton Keynes providing a wide range of sites to meet business needs. The need to follow advice in the National Planning Policy Framework and flexibility in policies was also stressed.

On how we can promote and encourage the provision of accommodation fit for micro and small businesses, which constitute the majority of all businesses within the Borough, respondents felt there was scope to reuse empty retail premises in the older town centres and older buildings in areas such as Stony Stratford. All options including financial measures should be looked at to bring vacant buildings into active use. Businesses stressed that Milton Keynes should continue to provide a mix of speculative and purpose-built units in accessible locations in the city. One response felt CMK should be a focus for provision, another felt they should be provided in new villages centres well connected to CMK.

Question 3 asked how we can encourage the development of Central Milton Keynes (CMK) to play its full role as the primary focus for knowledge based employment growth within the Borough. There was support for the growth of CMK as a regional centre or hub for the benefits this would bring to the city. However, for growth to happen it was recognised that CMK needed to provide a diverse range of space to meet business requirements. Other responses referred to uses and facilities, which support the growth of CMK such as a University/research institute, housing, cultural offer, good transport connections etc. Some representations referred to CMK as a high cost location to operate in and to parking and queueing difficulties. There was an acknowledgement that while some businesses liked to cluster and preferred a central location, for other businesses CMK was unsuitable and alternative provision needed to be made elsewhere. Opportunities for the relocation of large London based businesses to CMK were highlighted.

Question 4 asked how can we encourage the growth of homeworking within the Borough. The factor mentioned by most respondents to this question was the provision of high speed broadband/internet services across the Borough. The provision of home offices, offices over garages and serviced multi-purpose office spaces in smaller (village) centres was also mentioned. Although the sustainability benefits of homeworking were acknowledged and some employers are in favour of it, there was still felt to be a high level of resistance throughout most businesses.
Views were mixed on the question about whether the Council should permit more D1 uses such as places of worship, in a limited number of industrial estate locations throughout the city. The MK Council of Faiths was strongly in favour; other replies were opposed to the use of vacant buildings as places of worship. Others felt this should be on a case by case basis, with careful consideration especially of parking provision. Some referred to the mutually beneficial sharing of parking facilities between places of worship and offices.

On the question of whether the Council should intervene to promote office type development at the expense of warehousing development or should the Council continue to allocate additional employment land for warehousing assuming that it is required, the reaction from landowners, developers and agents was generally negative although some Parish/Town Council’s supported restrictions on warehousing as not a good user of employment land.

Question 7 asked if additional employment sites are needed in the Borough up to 2031, where should they be located and how much land is required. The Highways Agency made an important point that any new employment sites should be in sustainable locations, close to public transport services, achieving a balance of jobs and housing as well as co-locating homes and jobs to minimise the number and length of car trips. The scope for the reuse of existing buildings and brownfield land was also highlighted. Some replies stated development should be at locations along the East-West Railway line and the dualled A421. A consultancy commented that their research showed that MK will need a significant amount of new employment land to support forecast job growth up to 2031. A portfolio of different sites of varying sizes matched to different sectors of the market particularly logistics is required.

Question 8 allowed respondents to raise any other point relating to employment that had not been addressed elsewhere. A number of topics were raised, some of which have already been mentioned e.g. provision of Broadband. The balance of homes and jobs in Plan:MK was a key issue with an increase in the level of housing in Milton Keynes sought to reduce the extent of in-commuting into the city. The contribution of employment uses other than ‘B’ use classes needed to be acknowledged as a key driver of economic growth in Milton Keynes and CMK especially. There was some criticism that as the Council’s Employment Land Study (EGELS) had not been concluded it was difficult to analyse where the vision for economic growth lies and Plan:MK needs a clear economic vision for it to be successful.

**Overall Comments**

There were four general comments made in this section covering a wide variety of different topics. Among the positive comments received was that Milton Keynes is a great place to do business in but on the negative side the difficulties of recruiting and retaining skilled staff were stressed.

The local economy would benefit from a ‘proper university’ and improved transport links and parking and improved technological connectivity.

The importance that the retail and service sector economy played in the local economy should be highlighted more.

**What members of the public said:**
A local businessman commented that Milton Keynes is a great place to set up and grow a business, but it is difficult to recruit technical support staff and software developers locally. One of the biggest challenges for Milton Keynes is the lack of a pool of suitably qualified local people who are willing to stay in the area. If employers cannot recruit locally, they will go elsewhere. His firm are considering setting up a new office in Manchester where staff recruitment is easier. What Milton Keynes needs is a ‘proper University’ as Cranfield and the Open University are not supplying people who can meet this need.

What Town and Parish Councils said:

The central issues for employment and economic growth in the Borough were improved transport links and parking and improved technological connectivity.

What Ward Councillors said:

The MKC Liberal Democrat Group reserved comment on this Topic Paper at this stage until the Council’s Employment Land Study had been produced.

What the industry said (e.g. landowners, developers, agents...):

The Topic Paper did not recognise the important role that the retail and service sector economy played in delivering economic growth in Central Milton Keynes (CMK) and Milton Keynes.

**Question 1: Policies**

- How should Milton Keynes Council plan pro-actively to meet the development needs of business and support an economy fit for the 21st century?
- What planning policies for employment do we need in future to manage the Milton Keynes economy?
- Are there any planning policies for employment that should be retained, even though they may be in a modified form; what policies can be discarded; are any new employment policies needed in future, which might include planning policies for the development of strategic sites?

What members of the public said:

- More jobs in small scale, locally-managed operations offering staff good facilities and working conditions rather than large corporate organisations.
- Blind Pond Farm should be maintained and enhanced as a potential source of local jobs as well as serving the local community. Contends that local jobs and services are needed more than housing.
- Sees expansion of the city as a ‘generally positive thing’, asks where new strategic sites should be and how they relate to the city and its infrastructure and whether there is a plan for growing them.

What Town and Parish Councils said:

Planning pro-actively for future needs:
A flexible approach to how a business park should look. Unit size and parking are key. Future proofing from the start will prevent dilapidation post 2030.

Want planning policies for employment strengthened to protect Bletchley Town centre, even where they may be in conflict with the National Planning Policy Framework (NPPF).

Support improved transport links and better internet/broadband access throughout the Borough to enable businesses to grow and develop.

Why change a winning formula that has worked extremely well in developing a vibrant city to date? Milton Keynes past success may become its failing in the future.

The Council should concentrate on the regeneration of existing employment sites so they are suitable for future employment needs. If older sites are left to ruin, while new developments are promoted, the older sites can become unattractive for regeneration without complete demolition.

Support building redevelopment especially with regards to energy conservation, migration of use. E.g. warehousing to offices, rolling out of superfast broadband.

Retain employment policies E1-E11 but with less emphasis on rural development since this has had little take up in the past and contributes little to employment growth or local employment.

What Ward Councillors said:

Two Councillors highlight the fundamental importance of attracting, growing and sustaining businesses and jobs.

What Milton Keynes Council departments said:

One team said that employment should be focused on sites with best infrastructure provision in terms of superfast broadband, access, transport including public transport and environment. Plan should support infrastructure delivery e.g. superfast broadband. Support for East-West Rail and making best use of its connections to Oxford etc. Creation of new employment sites around railway stations focused on high technology development with mixed use development (shopping/leisure). They said Milton Keynes should retain and develop policies that enhance its reputation as a business centre. Expansion of university facilities will generate skills required for competitiveness; create entrepreneurs and reputation of the city. Ensure provision of superfast broadband to major employment sites and new housing developments to facilitate homeworking. Redevelop outdated employment sites to meet market expectations. Review all policies and retain those still considered effective.

Another said that Plan:MK should highlight the Council’s Neighbourhood Employment Programme (NEP), which implements a key priority of the Economic Development Strategy about improving access to training and job opportunities for those with no or low skills. Refers to the MK Economic Growth and Employment Land Study (EGELS) and notes that if employment land is no longer fit for employment purposes were developed for housing, this would boost the supply of workers in the city and reduce in-commuting.

MKDP stated the need to identify the differing future business types, employment requirements arising and requirements for land, and allow for provision to cater for this. An Employment Land study is being prepared and is anticipated to identify future needs and the current vacant sites that have a beneficial future use. Increasing reliance on IT will lead to future changes. Need to encourage new businesses and inward investment.
What the industry said (e.g. landowners, developers, agents...):

Planning pro-actively for future needs:

- MKC should proactively plan to meet the development needs of business by fostering the spirit of the NPPF and reduce the burden of policy requirements relating to design, parking and the requirement for mixed uses and active frontages at ground floor level. Plan:MK should recognise the constraints in which developers operate especially commercial viability. Plan:MK should recognise the impact Business Neighbourhood Plan policies can have on delivering a vision for economic growth especially when some policies are prescriptive.
- Any employment policy should follow Government advice. Sites no longer suitable for employment use should be used for alternative uses such as residential.
- The Council should plan to utilise the strengths of the Milton Keynes area, its strategic location in relation to the UK’s population and good and improving transport links. Highlights the quality of the environment in MK as a factor in encouraging inward investment and green spaces in the city making it an attractive place for residents and business.
- The city needs to position itself for different types of economic activity and pro-actively meeting the development needs of business. Refers to the city’s economic strengths and performance. Milton Keynes needs to plan for a portfolio of different sites, of varying sizes matched to different sectors of the market and providing opportunities of appropriate scale to ensure flexibility to respond to market needs.
- The Council should plan to utilise the strengths of the Milton Keynes area, its strategic location in relation to the UK’s population and good and improving transport links. Highlights the quality of the environment in MK as a factor in encouraging inward investment and green spaces in the city making it an attractive place for residents and business. Employment land should be located in strategic locations near grid roads and the M1 to make best use of Milton Keynes connectivity. Provision of employment land should be to meet the needs of business, including the provision of superfast broadband.
- The workforce for the local economy will require homes. Growth of jobs to support the economy should be a key input in establishing how many homes are required. No figure for jobs has been established or the number of homes to provide for these jobs. Refers to the Council’s SHMA attempting to estimate the number of homes without a definitive growth in jobs. Although the Employment Topic Paper claims growth is employment-led this approach is not developed in Plan:MK. Alleges the production of the SHMA in advance of the EGELS has had the effect of the Council identifying a level of housing growth in advance of jobs growth and jobs growth will be constrained by this. Argues providing jobs not supported by homes is an ineffective policy although workers can commute to fill jobs in Milton Keynes from neighbouring areas those neighbouring areas need to agree to provide homes that do not provide for their own economy.
- EGELS should be produced in line with relevant requirements of NPPF. The following issues are identified as key to the future prosperity of Milton Keynes:
  - The retention of a diverse employment base of low- and high- skilled jobs;
  - Addressing the emerging barrier to the growth that is presented by the under-provision of housing of the right types and in the right locations to minimise car journeys; and
Ensuring that provision for employment is closely linked to the City's strategic movement network, including public transport corridors, park and ride, and rail provision.

The Council should pro-actively seek to meet the needs of current business in the Borough by ensuring that adequate and high quality facilities are secured to enable businesses to continue to operate competitively to support the economy and local jobs. Policies should be suitably drafted to meet the dynamic needs of business both in expansion and contraction.

More flexibility within the employment policies to recognise a wide range of employment uses in addition to traditional B Class uses. Plan:MK should follow advice and requirements of the NPPF. The Council should not be overly prescriptive regarding specific uses and should be seeking to positively promote economic growth and support businesses. Planning policies should be flexible to promote a prosperous economy able to accommodate changing business needs. Markets and economies evolve and not all new businesses fit within traditional use class definitions. Specialist operations have an important role to play in the economy and it is helpful for local authorities to recognise those uses that are appropriate on employment land within the relevant planning policy framework. Documents should provide clear guidance to operators and developers thus encouraging development.

Employment policies needed

Flexible policies that allow for a range of employment uses but recognise where market demand wishes to locate employment in a sustainable manner.

The Council should be proactive, open for business and welcome investment in the area. If not then ‘footloose’ investment will go elsewhere. Refers to the International Sports City (ISC) initiative and the social, cultural and economic benefits that come from new facilities being developed and maintained and high profile mass participation sporting events taking place locally e.g. the Rugby World Cup. Refers to the benefits and regenerative effects of sporting developments such the Stadium:MK on Denbigh North.

Emphasises that Milton Keynes must plan for the growth of the logistics sector in key strategic locations as with the rise on ‘online’ shopping and local convenience stores needing fresh produce in a variety of locations, the logistics sector has become a key part of the retail economy. Key to the development of the logistics sector is access to flat well accessed, developable land and local authorities have a large role to play in ensuring land is available.

Refers to the six priorities in the Milton Keynes Economic Development Strategy 2011-2016 and the South East Midlands Local Economic Partnership (SEMLEP) Strategic Economic Plan which identifies four sectors of the economy (high performance technology, logistics, manufacturing and advanced technology, and the cultural and creative sectors) as having the greatest potential to grow. Argues Plan:MK should align with the priorities and objectives set out in these two documents.

Milton Keynes should plan for the growth of financial and professional services, motor sport businesses and the logistics sector in strategic locations. There is strong demand for logistics floorspace, which is not being met. Reference is made to a GVA study in 2012 for Central Bedfordshire. The availability of warehousing and logistics premises has fallen every year since 2009 highlights the large number of jobs that can be created by these facilities.
The primary policy which links with other elements of the plan is to establish how many jobs will be provided through Plan:MK.

A definition of “employment development” proposed which recognises that there are businesses that do not fall within traditional ‘B’ Class uses yet which provide substantial economic benefits and are entirely appropriate in an employment location, such as builders’ merchants, trade specialists, warehouse clubs, and cash and carry operators.

One respondent put forward proposed wording for new policies.

Existing policies

- Local Plan Policy E1 (Protection of Existing Employment Land) should be discarded because it conflicts with the Core Strategy and National Planning Policy Framework (NPPF).
- Employment policies in the Local Plan have been carried forward time and time again, they need to reflect the proactive approach of the NPPF. Thought needs to be given to new policies encouraging new investment in a variety of sites with different characteristics, including provision of large footprint buildings in strategic locations, as part of a strategic vision for the future. Apart from delivering sufficient housing for employees, employment must be a priority. There needs of growth must be balanced against the needs of preserving and building on Milton Keynes strengths, its connectivity, green spaces and skilled labour force.
- Refers to the Local Plan having specific policies (E12-E15) for the development of what is now Magna Park and supporting the principle of allocating land specifically for large footprint employment uses. Plan:MK should allocate a new site capable of meeting large scale distribution and manufacturing operations to accommodate the wholesale distribution and logistics sector. Support for the principle of developing employment uses in Central Milton Keynes particularly additional office (B1a) and high technology/research and development (B1B) floorspace. However, Plan:MK should recognise and consider the potential role of alternative sites in meeting business needs.
- Inadequate current provision for B8 (Storage/Warehousing & Distribution) uses. The majority of employment sites identified in Table 5.4 of the 2013 Core Strategy are too small to accommodate the requirements of the logistics and distribution sectors and may be unattractive to modern business needs as they have been undeveloped for some time. Milton Keynes Economic Growth and Employment Land Study needs to be based on a different approach to identifying a fresh portfolio of employment land rather than rolling forward ‘legacy’ allocations. MKC should seek to ensure that new planning policies continue to provide a framework that supports inward investment and promotes Milton Keynes as a desirable business location, including specific provision for a strategic employment site.
- MKC needs a strategic vision for employment designation in the Borough. This vision should encouraging development in a variety of sites with different characteristics, including provision of large footprint buildings in strategic locations. More sophisticated policies needed to encourage financial and professional services and motorsports businesses to locate and expand in MK.

What local organisations/interest groups said:
The Canal & River Trust are responsible for the Grand Union canal which runs through Milton Keynes. Highlight the contributions of waterways as tourist and visitor attractions and waterway infrastructure supporting small and medium sized businesses in the marine sector and jobs in rural areas. Mentions the use of canal tow paths as places for installing fibre optic and BT cables. Refers to the role of waterways in supporting recommendations of the ‘Taylor Review of the Rural Economy’ as places for urban renaissance and rural regeneration and diversification. Concerned if new employment opportunities related to the canal are located in areas where permission may not normally be supported.

A local society stated that MKC should place less emphasis on distribution and logistics sites, which occupy large footprint sites and contribute little to the MK economy; have discussions with existing local businesses in respect of skills they need and planning to meet those needs; and also have discussions with local businesses in respect of the conditions they need to both stay and expand in MK and to find out what attracted businesses to MK so that this knowledge could be used to attract more businesses to MK.

Retained policies are still appropriate to MK’s needs and no additional planning policies are required. All retained policies listed in the Employment Topic Paper are still appropriate to MK’s needs unless superseded by Government policy. Propose a new policy that in any new development of over 100 homes some land is reserved for micro/small businesses to start up.

**Question 2: Micro and Small Businesses**

- How can we promote and encourage the provision of accommodation fit for micro and small businesses?

What members of the public said:

A sole trader said the most interesting places to live are often where residential, small scale employment & retail co-exist with a relatively fine grain- structure. The traditional high street has been eroded, where previously this tended to happen organically. So policies encouraging a finer mix might be the more interesting approach. The comments about encouraging training, infrastructure etc. are all things most people would agree with.

What Town and Parish Councils said:

Smaller units like on older business parks should be actively promoted such as Stacey Bushes and Bradville.

Support for small and micro businesses to be expanded into empty retail premises in the older town centres and would like to see this policy retained encouraged and enforced. The growing ethnic population has a strong business ethic and this would help to get businesses off the ground, it would be useful if a small business service could also be established giving advice to these entrepreneurs.

Question “should we” given the limited resources of MKC looking into the future. Does the investment reap the rewards for the city against placing more emphasis on encouraging medium to larger employers? The key issues for micro and small businesses are accommodation and communication, including high-speed internet and telecommunications. For accommodation then consider supporting redevelopment of the smaller older...
warehousing units that lie dormant. Landlords seem only too happy to leave them dormant and reasons are given in the response for that. MKC should look to engaging policies that discourage dormancy through, for example, change of use, development support, rate relief for renovations, and discouragements (increased charges for dormancy).

One Parish Council questions why the space around MKC is not developed as cost effective accommodation for small businesses. Micro and small business need affordable accommodation with easy access, affordable parking and high-quality technological links.

First floor accommodation is already used for commercial purposes in Stony Stratford High Street. However, many older buildings in the town may be suitable for very small or start-up businesses, or could be made so with minimal alteration, provided a careful balance is struck between the needs relating to cultural and historical heritage and the operational needs of such businesses. Such development would enhance the economic viability of the town centre.

What Ward Councillors said:

Two Councillors echoed the points above about using older properties for small businesses. Conversions on newer developments such as on Crownhill could also be provide specifically for growing small businesses.

What Milton Keynes Council departments said:

One team highlighted the importance of micro and small businesses to the local economy and the need to provide suitable infrastructure to accommodate them. Current new areas of development such as Wolverton Park and the EEA and WEA may be suitable locations for these businesses. An alternative option could be to make homeworking a viable option with could provide a cost effective method for micro businesses. The planning obligation Policy PO3 in the Local Plan [for the provision of small business units] should still be retained though possibly modified, to make it more usable. Similarly, maintaining Policy E11 protects current accommodation for these businesses by restricting planning applications that affect their viability.

What the industry said (e.g. landowners, developers, agents...):

Focus should be in Central Milton Keynes.

Planning policies should be flexible enough to allow the market to dictate the need for micro and small businesses. It should not be a policy requirement to provide them without sufficient and robust technical and support assessments and justification of their need and demand.

Highlight the types of premises required by different sectors can vary greatly with the range of different activities involved. However, there are certain types of sites which can accommodate many of the needs of different sectors, which provide the space to maximise the potential to attract mobile investment. A large site provides the ability and flexibility to accommodate large-scale inward investment occupiers, and also has the ability to allow for agglomerations of small scale occupiers engaged in different processes and activities within single industries or across multiple related sectors, thereby accommodating micro and small businesses.
Milton Keynes has a very good track record of being an incubator location for start-up businesses. It should continue to provide a mix of speculative and purpose-built units for SME business space in accessible locations, including those within the city, but also in new village centres that are well linked to Central Milton Keynes.

What local organisations/interest groups said:

A local society suggest that a small percentage of land is set aside as part of planning for all of the new larger sites in line with retained Policy E9.

Question 3: Central Milton Keynes

- How can we encourage the development of CMK to play its full role as the primary focus for knowledge based employment growth within the Borough?

What members of the public said:

Central Milton Keynes as a focus for a knowledge based economy. Many small businesses are based away from the relatively high rents associated with Central Milton Keynes creating dispersed employment. Communications infrastructure is increasingly important.

What Town and Parish Councils said:

CMK needs to be careful that we don’t overload; opposed to pushing out into large business parks such as Winterhill; Kiln Farm and Mount Farm are ideal areas to be regenerated as new multi-use business/multi use parks with local facilities around them. Parking is becoming a major problem with the new Network Rail and the danger is people will consider cost of parking and convenience when they consider a new job.

The CMK Neighbourhood Plan should support the development of the city centre for all including its position as a regional hub.

Knowledge-based employment is a key sector in the UK economy and for a city with the vision of Milton Keynes it is a critical growth area.

Work done by the UK Science Parks Association, emphasises the factors which can increase the chances of success of a local knowledge-based economy.

The Business Neighbourhood Plan for CMK places great emphasis on all four of these components. Thus, by supporting the implementation of the plan, MKC will be encouraging the development of CMK to achieve its full potential in the growth of the knowledge-based economy of the city.

The prime problem of having a business in CMK is that of cost not only for the business but for staff as well with regards to transportation and parking. Therefore, there has to be a good commercial reason for being in CMK. There are certain businesses (solicitors, accountants etc.) that prefer to cluster and perceive market benefits of being centrally located. However, as these businesses grow they tend to move out of CMK into surrounding areas like Knowhill as an example. However, attracting larger organisations from London
to relocate, especially supported by the intercity rail network, could have significant opportunities. This could certainly be enhanced by engaging with the train operators who have London-MK spare capacity during peak travelling times.

Improved technological links, specifically internet access and improved transport links and improved station facilities. CMK station does not present the welcome to visitors we would like to see, nor does it make MK a more attractive alternative to London for knowledge-based professionals.

What Milton Keynes Council departments said:

One team within the Council stated that CMK must have up to date, efficient infrastructure to allow optimum business functionality, including superfast broadband for all business premises and homes including 4G connection throughout. Transport infrastructure must allow for ease of movement in and out and around CMK. The East-West Rail connection is important for linking Milton Keynes to Oxford and Cambridge and beyond to facilitate trade and the commuting of skilled workers and improve connections with world class research facilities. Movement around CMK through autonomous driverless vehicles increases public transport options and can lead to reduction in congestion but has a novelty which sets a positive message about the innovative nature of Milton Keynes which should help attract knowledge-based industries. There are opportunities to develop local heating networks from the CHP plant in CMK and to look toward connections for renewable power. If CMK can guarantee a resilient supply of low cost energy which is not prone to price fluctuations then this will be a significant selling point for all business. The development of the University Campus is essential and its location in CMK should act as a catalyst for the roll out of new and expanding enterprises into the area. A number of office blocks will need to be redeveloped to bring up to modern standards in terms of energy efficiency, ergonomics and to create an aesthetic that sells Milton Keynes as a modern city. There is evidence to show that quality of life and a diverse cultural offer is a significant factor for workers in creative industries when they choose where to live and work. CMK as a centre for arts, culture, entertainment and sport should be supported.

Milton Keynes Development Partnership stated the need for clear policies to support sustainable development. Development in key areas will support wider economic growth and activity including Midsummer Boulevard East. There are potentially areas within CMK which are yet to be developed that can assist the successful development of CMK for a full range of property uses.

What the industry said (e.g. landowners, developers, agents...):

Central Milton Keynes needs to provide a range of business units from incubators to small suites/workshops so that business can thrive from close proximity with opportunities for cross-selling, joint working etc.

A lack of larger business space is a risk and whether the size and quality of available sites is enough to support demand for clusters of knowledge-driven and high technology industries. Traditional knowledge based and high-tech industries are moving away from a single-use use business park approach towards a wider mix of uses, so Milton Keynes needs to ensure that a diverse range of business space is provided, both in the city and linked to the city, to ensure sufficient choice of business space is provided to meet the requirements of both young entrepreneurs and executives.
Support for the development of Central Milton Keynes (CMK) and the role it has to play in the move towards high value, knowledge-based employment growth in the City. Policy CS3 of the adopted Core Strategy indicates that CMK is the primary focus for the development of additional office (B1a) and high technology research (B1b) uses. On this basis, the Milton Keynes East (MKE) proposals will substantially enhance the Milton Keynes ‘offer’ by providing floorspace suitable for accommodating knowledge-based businesses whose needs are not met by office floorspace or are less capable of being accommodated in central urban locations. These could include high performance engineering, advanced and technology-based manufacturing, advanced logistics, business service relocations, some types of environmental industries (e.g. solar power) and some types of creative industries.

Support for the development of CMK to play its full role as the primary focus for knowledge based employment growth.

**Question 4: Homeworking**

- How can we encourage the growth of homeworking within the Borough?

**What members of the public said:**

Ensuring that local infrastructure is in place to help facilitate people not feeling the need to travel to an office base. Parking, local centres etc. New residential executive homes with office space are essential.

**What Town and Parish Councils said:**

One Parish Council commented that you can only facilitate homeworking as businesses have varying regards to homeworking and needs; there is still a high level of resistance throughout most businesses.

First-world technological links, specifically internet access are needed.

Another Council felt that a lot of the local jobs, especially for the recently unemployed are in elementary occupations, do not lend themselves to homeworking. The increase in zero hour contracts has again changed the economic structure.

Broadband capacity is extremely poor in parts of Bow Brickhill and Great Brickhill which actively discourages home working. A more consistent approach needs to be achieved from utilities providers.

**What Ward Councillors said:**

Two Councillors supported homeworking, see also answer to question 2

**What Milton Keynes Council departments said:**
Provision of superfast broadband where feasible will make homeworking a practical alternative. Benefits of home working can include reducing carbon footprint, lower fuel bill, greater flexibility, lowers congestion and saving money. Provision of community spaces where occasional face-to-face meetings can be held by homeworkers, outside of their home in a safe environment should be encouraged.

What the industry said (e.g. landowners, developers, agents...):

Homeworking is something that will be encouraged predominantly by market forces rather than the Council. However, it can be encouraged through the provision of fast broadband, and (where appropriate) use of home offices, offices over garages, and serviced multi-purpose office spaces in smaller (village) centres.

Ensure highest speed internet connections across the town.

What local organisations/interest groups said:

Ensuring that all new homes are connected to superfast broadband as part of building requirements.

**Question 5: D1 Uses on Employment sites.**

- Should the Council should permit more D1 uses such as places of worship, in a limited number of industrial estate locations throughout the city? Which buildings/locations might be suitable for this use?

What members of the public said:

- Support for the flexible use of undeveloped sites for places of worship.
- A masterplan showing specific locations and effects on infrastructure would be a useful outcome of this consultation.

What Town and Parish Councils said:

- Vacant buildings should not be used for places of worship but should be retained for employment use.
- Do not fully support this. These churches provide valuable income for the meeting places which accommodate them.
- On a case by case basis such uses could be allowed as they help to cater for a growing need.
- Careful consideration is needed, especially of parking provision, especially where holy days fall on week days. In the main, though, there may be mutually beneficial sharing of parking facilities between places of worship and offices.

What Milton Keynes Council departments said:

One team stated that some D1 uses could be permitted in industrial estates which could make use of car parking as they generally operate when the employment uses are less active. Such uses should be in locations on public transport routes. The overriding consideration should, however, be the protection of sites for employment.
What the industry said (e.g. landowners, developers, agents...):

- Encourage re-use of employment sites and buildings from other uses - conversion to residential is now encouraged under the permitted development rights introduced by the Government. Policies should not be onerous in restricting alternative uses but should let the market dictate use.
- Do not support change of use of employment uses or buildings for uses such as retail that would harm the vitality and viability of the CMK Primary Shopping Area.
- Planning for D1 facilities should equate to community facilities and provide them close to residential areas.
- Generally integrate D1 uses with town or city centre locations where traffic movements likely to be minimised.

What local organisations/interest groups said:

The MK Council of Faiths strongly supports the use of locations on industrial estates for D1 uses and welcomes the increasing flexibility it has seen to the reallocation of redundant warehouses for such uses. Encourage this flexibility to be incorporated into Plan:MK’s policies - this could still include a caveat that employment uses should be considered first. Criteria for conversion should include the unit’s unsuitability for modern warehouse uses; its period of vacancy and the availability of a minimum level of car parking.

Do not agree that proximity to housing is an advantage as distance from housing minimises noise disturbance issues.

Question 6: Warehousing

- Should the Council intervene to promote office type development at the expense of development such as warehousing?
- Alternatively, should the Council continue to allocate additional employment land for warehousing assuming that it is required?

What Town and Parish Councils said:

Would generally avoid “intervene” and would move more towards “encourage” if the market is leaning that way. Demand for distribution floorspace is changing with demands for a flexible workforce to support larger warehouses with sophisticated picking, packing and distribution technologies.

Future proof employment space and buildings to accommodate changing trends and technology needs.

Limit the amount of land allocated to warehousing. Plan:MK should allocate more land for small manufacturing units. Consider designating corner sites of grid roads for this purpose.

Warehousing does not make good use of employment land and leads to adverse impacts due to heavy traffic.

What Milton Keynes Council departments said:
The Council should intervene to promote office over warehousing uses based on location. Office space is required for a majority of job sectors in MK. Warehousing requires much more space and delivers a much lower job density. Offices should be encouraged in CMK and the built up area of MK; warehousing is still relevant to the economy but should be located in areas such as Magna Park.

What the industry said (e.g. landowners, developers, agents...):

No - to intervene would seek to reverse global, national and regional market trends and would be an inappropriate strategy to take. Whilst acknowledging the need for office floorspace, to achieve this at the expense of a thriving logistics sector would be irresponsible.

Land should be allocated to support all types of employment and not to prioritise one type over another. Promote a balanced economy.

Market indicators are that most companies using distribution facilities need more space. The City should capitalise on its locational advantage for logistics to provide employment both for MK residents and those of Central Beds who commute here.

No, as required by the NPPF, the Council should ‘positively seek opportunities to meet the development needs of their area’ (NPPF para 14) and allocate additional employment land that meets the needs of businesses and the market based on evidence, in line with the requirements of both the NPPF and the PPG.

Analysis undertaken by a consultancy indicates that there is a substantial need for additional industrial floorspace in Milton Keynes, including for B8 warehousing and distribution uses. Importantly, there is a requirement for a portfolio of different sites, of varying sizes, matched to different sectors of the market and scale of opportunity is required. The attractiveness of Milton Keynes as a location for large regional hubs is proven, with e-commerce market leaders such as Amazon, John Lewis and River Island locating in the Borough in recent years. Therefore, Milton Keynes is well placed to attract further occupiers of this type. If Milton Keynes fails to plan positively to accommodate the logistics sector; it is likely to lose out to competing locations within the SEMLEP or other areas nationally.

What local organisations/interest groups said:

Warehousing contributes little to MK’s aspirational image; requires little in the way of skilled labour and, due to pay levels, requires many employees to be brought in from other areas. With increasing automation even fewer jobs would be provided. If MKC has a vision for the type of city that MK should become then Plan:MK should intervene and it should not be left to market forces.

Question 7: Future Allocations

- If additional employment sites are needed in the Borough up to 2031 for whatever reason, where should they be located and how much land is required?

What members of the public said:
• If the A421 is to be dualled it would make sense for the Plan to respond to that. Favours extending the designated area to maintain the relatively low density/high public open space provision that is part of MK’s character.
• Allocate a Science Park or office park at Bow Brickhill or Woburn Sands to capitalise on the Technology Arc

What Town and Parish Councils said:
• Only provide new employment sites to meet demand; it’s not a case of “if you build it they will come”. Businesses will cluster towards the new buildings and they prefer to lease rather than buy. Keep demand slightly ahead of supply to encourage re-use and redevelopment.
• The original policy of mixing employment areas with housing is no longer viable due to the pressure that articulated trucks put on the city’s roads.
• Locate large industrial sites in a one mile corridor along the M1.
• Phase out existing older sites e.g. in Bletchley, Bleak Hall, Snelshall and re-zoned for housing/retail and light industrial.
• Provide new employment sites in established centres and on brownfield sites.
• Locate employment sites close to public transport hubs.

What Milton Keynes Council departments said:
The current target for 1.5 jobs per dwelling should be continued and it may be that a large employment site is needed to meet the target. A large site can allow clustering of related industries but must have excellent transport links and superfast broadband. Opportunities for local heat networks and connection to renewable energy sources should be considered and included in policy of possible.

Plan:MK should support regeneration of unused office space, this should minimise the need for new land allocations.

What the industry said (e.g. landowners, developers, agents...):
• Plan:MK should be focussing on a longer period than 2031. A variety of land types should be available for different business needs.
• New employment land should also be able to support leisure development in line with the ISC objectives.
• New employment land should include provision for larger footprint buildings at key strategically located sites. Under- or un-used sites in older employment areas should be allowed to be reused e.g. for logistics or motorsports uses.
• Employment land provision at SWMK includes space for starter business units for which there is a need and demand in MK.
• Locate office parks along the East-West Rail link.
• Currently the Council does not have an up to date assessment of economic development and business needs. MKC needs to consider patterns of employment land supply and losses to other uses; market intelligence; market signals; public information; the stock of existing employment land; locational and premises requirements of different businesses. MK currently has 220ha of vacant and undeveloped employment land; even if it was all of the right type and location there is insufficient to meet future forecast growth and in fact not all of that 220ha is in the right place and of a type to meet needs. In qualitative terms there are even more gaps.
Analysis by a consultancy shows that MK will need a significant amount of new employment land to support forecast job growth up to 2031. A portfolio of different sites of varying sizes matched to different sectors of the market is required.

Experience shows persistent demand for warehouse space - these uses are ideally located near to good transport links e.g. M1.

What national/statutory organisations said:

Highways Agency: any new employment sites should be in sustainable locations, close to public transport services. Try to achieve a balance of jobs and housing as well as co-locating homes and jobs to minimise the number and length of car trips.

What local organisations/interest groups said:

One local society await the EGELS before commenting

Question 8: Other Issues

Is there are any other employment or economic growth issue that not addressed in this Topic Paper that need to be considered in Plan:MK?

What Town and Parish Councils said:

- The need for super high speed broadband must be emphasised.
- Refer to future employment opportunities in the form of support for the elderly. MK is strategically located and has the land to support the development of housing stock for the older population. There needs, though to be a revolution in house design (including attention to door widths, stairs, wet rooms, alarm systems etc.) which would allow more elderly to be cared for in their own homes and not in hospital.
- Supporting infrastructure, quality of life and training are all basic requirements to attract new businesses to MK.

What neighbouring and other local authorities said:

Northampton Borough Council refers to their comments made on the EGELS. MK is a net importer of labour which leaves areas like Northampton performing the role of labour supplier. Need to consider the impact of permitted development rights as this could impact on the mix of uses and on supply/demand.

What the industry said (e.g. landowners, developers, agents...):

- Without the evidence base from the EGELS it is difficult to analyse where the vision for economic growth lies. Plan:MK needs a clear economic vision for it to be successful.
- There is a lack of cohesion in the Topic Papers - a serious oversight in making the area attractive to international investors.
- Address the balance of homes and jobs in Plan:MK. Increase the level of housing to reduce in-commuting
- Plan:MK should support development on the edge of Milton Keynes, including in neighbouring areas to reduce commuting distances for some workers. Carry forward the principles of Policy CS5 into Plan:MK.
Policies should allow flexibility for employment sites to come forward for other uses when such development could be shown to have economic benefits or the site is currently underutilised.

- The employment potential of uses besides Use Class B should be recognised.
- Recognise retail and leisure employment as a key driver of economic growth in Milton Keynes and CMK especially.
- Just as permitted development rights now allow change of use of office buildings to residential, the same should apply to the change of use of allocated employment land.

What local organisations/interest groups said:

Parks Trust: the economic value to MK of its green space needs to be recognised in the vision. Protection of green spaces should not be seen as a constraint but rather as adding economic value to Milton Keynes in general. Development control policies should allow for appropriate ancillary forms of built development in parks (visitor centres/ cafes/ cycle hire etc.).

One rural residents’ association said that very high quality broadband services, especially in rural areas, are long overdue and are an essential economic development requirement.

A local citizens group said priority should be given to new employment development delivering higher paid work and which promotes the expansion of skills.
4 Town Centres and Retail

Summary

This Topic Paper covered issues including the future role of Central Milton Keynes (CMK) and the other town and district centres in the Borough. It discusses whether changes are needed to the current retail hierarchy to reflect changing trends in retailing and the impact of recent developments. The Paper considers the decline of town centres and asks whether the Council should be more proactive in encouraging regeneration of the older town centres in particular. Interventions considered in the Topic Paper include restricting types of uses in some centres; a specific discussion around the impact of restricting the location of hot food takeaways near to schools and restrictions on the size of food stores in local centres and the thresholds at which a retail impact assessment should be triggered. In all, 131 responses were received from 38 organisations and individuals.

The majority of responses related to CMK in some way. Whilst there was overall support for maintaining and promoting CMK’s regional role, most responses on this matter considered that it should be more than just a regional retail role, but that it should be expanding its wider role as a destination to include its leisure and cultural offer as well. Concern was expressed at the amount of out of centre retail that the Council has allowed in recent years, MK1 being cited as one example, both for its impact on the vitality and viability of CMK but also for its impact on attempts to revitalise Bletchley town centre.

At the same time as support was expressed for CMK’s regional role, there was considerable concern that the retail hierarchy has meant that its local and district centre roles have been neglected, to the detriment of the amenity and convenience of not just residents of CMK itself but those in the surrounding, predominantly residential grid squares. It was originally the intention that CMK would provide the local and district centre functions of these grid squares, with the result that many of them have very limited facilities (such as parades of shops; meeting places; health facilities etc). This places residents without access to a car at serious disadvantage and is detrimental to community cohesion and development.

In terms of the retail hierarchy, there were calls for further consideration to be given to Olney and Stony Stratford town centres, both of which provide a wider than local role, serving a wide catchment, especially due to the presence of specialist shops.

On the question of the need for Plan:MK to include policies to restrict certain uses, the overall feeling was that the market should be left to decide. On the matter of hot food takeaways it was felt that there was insufficient evidence to justify restrictions and that such a restriction would not prevent school children buying unhealthy food from unrestricted retailers such as supermarkets and newsagents.

Overall Comments

What members of the public said:

- We are going down a blind alley - having started off as a new town where community and commercial interests were necessarily aligned to ensure success for all, we are still trying to get all interests round one table and hoping for consensus. When this fails, each party goes away determined to plough their own furrow.
Plan:MK must acknowledge that CMK has matured and now has similar problems to other town centres. It needs to stop looking to only a few commercial interests to solve its problems and encourage blue sky thinking rather than rehearsing tired concepts such as pedestrianising wide and windy boulevards.

The questions in the Topic Paper are often phrased in terms of the past while pretending to look to the future.

What Town and Parish Councils said:

Shopping centres such as Milton Keynes are brand ambassadors to aid web based shopping. There is much land set aside for retail to raise our ranking but it puts a strain on infrastructure, creates an increase in housing and the loop begins again.

Was MK ever designed to be a sprawling town with double the population it was intended for and a road/rail system that can’t cope?

What neighbouring and other local authorities said:

The West Northants Joint Planning Unit comments that in Plan:MK, MKC should consider the impact of additional retail growth at CMK on the vitality and viability of other centres outside Milton Keynes, including Northampton, Towcester and Brackley. The JPU agrees that another retail capacity study to assess how much retail floorspace is needed in future should be undertaken. Such a study should have regard to the recently adopted West Northants Joint Core Strategy and the Northampton Central Area Action Plan to ensure that the type and scale of retail development in MK is complementary.

What Ward Councillors said:

One Councillor comments that the current categorisation of the city, town, district centres, plus the hierarchy of retail sites that are ’near to centre’ and ’out of town’ centres seems arbitrary and not helpful. For example, designating Rooksley or Winterhill as ’out of town’ centres, a designation based around distance to transport hubs, feels impossible to defend objectively.

Given the constraints of the NPPF it would be easier to represent MK as having a hub and satellites ’city centre’. While the ’city centre’ clearly deserves a bigger share of future retail growth, giving it 85% and leaving the other retail centres about 2% each seems very disproportionate.

What National/ Statutory Organisations said:

The Theatres Trust supports policies for the provision and safeguarding of community and cultural facilities. Uses which keep town and villages centres active and vibrant during the day as well as the evening should be actively encouraged and protected. A successful evening economy improves the image of an area to visitors, it also improves quality of life for visitors. An appropriate balance is needed between promoting vitality and viability and managing the impact on residents due to noise, odour, litter etc.
Question 1: Retail in Town Centres

- Should the Council focus on developing CMK as a regional shopping centre?
- What vision should we have for the city centre in the future and what type of shops, facilities and activities do we want to see within it?
- Should the public spaces (boulevards and other public areas between buildings) be improved from a pedestrian perspective so as to provide a better integrated offer to shoppers/consumers and therefore improve dwell time and consumer spend?

What members of the public said:

- CMK’s role as a regional constantly over-rides its role as a local centre, which is wrong, but acknowledge that CMK is essential to the economic well-being of the whole city. It is also important for the sense of pride and civic belonging of all those who live in the wider MK area.
- The role of CMK has been eroded by the creation of an alternative centre at MK1 and should not be allowed to be further eroded.
- The centre:mk and Intu:MK should continue to improve their offering as enclosed shopping centres but a thriving regional, district and local centre should develop around them.
- Need to look for things that mark CMK out as special that will bring in new residents as well as visitors from the wider area - a multicultural ethos that centres on the outdoor market and a few specialist shops should be built on further, encourage greater engagement and visibility in the CMK economy of ethnic minorities.
- In favour of the proposals for the MSCP (multi-storey car park) at the end of the shopping centre by John Lewis.
- CMK needs to be more people friendly - at present it is a giant car park.
- Need smaller, affordable shop units for individual retailers
- Provide more underground car parking, or MSCPs connected by tram.
- Need more outdoor places for people to sit and meet, places for street entertainment and more green spaces between the shops.
- The road between the station and CMK (Midsummer Boulevard) needs to be a wide, pedestrian road with market stalls or small shops like the Barcelona Ramblas.
- The southern side of Midsummer Boulevard East needs redevelopment.
- If there are good reasons to move between areas of priority then people will move between them.
- Need for more convenience retailing; need a bus station, including facilities for passengers arriving by coach.
- Do not lose sight that new planned development will lead to a much larger resident population and need for expanded services, including tertiary education. The needs of the local population should not be overridden by the demands of large retail investors.
- Don’t understand the emphasis on pedestrians when the Council is about to approve a MSCP explicitly designed to move people from their cars straight into the shopping centre.
- Great opportunity to stand out in the UK with brave, visionary and unique plans.
The chain stores have removed the individual maker; the one off original and work of artisans. Need a zone for art and artisans.

CMK in danger of having only characterless, sanitised retail outlets. Something needs to be done to encourage development somewhere in MK that recreates the narrow bustling streets of Brighton or York, for example.

The issue in CMK is the surprising amount of run-down and unused space around the periphery of CMK eg the garden centre, Food Hall...

Outdoor markets should be seen as an asset, not an inconvenience.

The shopping centre needs to be upgraded if it is to be able to continue to compete.

What Town and Parish Councils said:

CMK Town Council’s strategy is to turn the retail core of CMK, with its inward looking shopping malls into a more outward looking driver of the city centre as a whole.

CMK needs populating through integrated development of residential, employment and educational land uses in addition to retail and leisure. A new market hall will encourage independent retailers and market traders to complement the existing outdoor market.

A new public transport hub near to the market hall will provide a major new focus of activity and provide the “High Street” that is currently lacking, incorporating an integrated retail and leisure offering.

The CMK Business Neighbourhood Plan identifies Midsummer Boulevard East as an Inset Action Plan Area for which a detailed design and consultation process is to be undertaken by the CMK Alliance, the resulting Action Area Plan would then form part of Plan:MK.

The existing public spaces support the development of CMK. Increased investment in high quality public realm in CMK is critical to its future success. Maintenance is overdue in many parts of the centre.

CMK was carefully designed as a revolutionary concept for business and people. These principles must be protected at all costs.

Development opportunities that modernise existing buildings should be allowed as long as they confirm to the design principles.

Given the advent of 24 hour digital retail technology, could the Regional Shopping Centre concept become an anachronism? Does CMK actually need to expand? In terms of the vision for the future, would it not be better to leave it up to market forces? MKC has only a peripheral role in new development and has been largely ineffective at maintaining any policy - the MK1 is a case in point which has been developed despite being contrary to policy.

MKC could help by changing the policy on charging for parking and by maintaining the urban environment to a higher standard in order to compete better with other centres. Availability of parking spaces is an issue at weekends and school holidays especially. The recent Black Friday traffic chaos proved that CMK infrastructure can’t cope with the existing retail demand.

MKC should focus not just on CMK being a regional shopping centre but focus should also be given to the older town centres and we need to adapt to the impact of MK1.
What neighbouring and other local authorities said:

Northampton Borough Council notes that there needs to be studies on the impact of the proposed expansion of retail on the viability and vitality of centres outside Milton Keynes.

What the industry said (e.g. landowners, developers, agents...):

Plan:MK should continue to focus on developing the PSA (Primary Shopping Area) as a regional shopping experience given its position at the top of the retail hierarchy and in order to give investors confidence to continue to invest there. Key to the success of Milton Keynes and its future as a successful regional shopping centre will be the integration of shopping with other uses, especially leisure, entertainment and dining experiences, enhancing its role as a destination.

CMK comprises distinct areas, all of which perform important roles in the overall centre. Policy should allow these areas to perform these functions which will help to strengthen CMK as a regional centre.

A vision for the future should include a commitment and understanding of the commercial realities of the retail sector. Need for flexible policies.

Large scale development in CMK involving a significant amount of other uses should not be encouraged, instead those parts of the centre where such uses are already established, should be the focus for those new developments.

There is a limit to the number of supporting uses - for example, recent planning applications for increasing the amount of cinema floorspace in CMK would saturate this part of CMK.

Plan:MK must include vision and direction including direction for the future of public realm and pedestrian space. Support improvement to the public realm to improve dwell time. This should include recognition of the benefit of safe, secure, pay on exit car parking.

Support promotion of CMK as a regional shopping centre but note the importance of other types of retail offer in the district, including the important role of centres like Wolverton in meeting more local shopping needs.

The Midsummer Boulevard East discussions are intended to identify a planned approach to develop the area’s potential. There are other areas in CMK, yet to be developed, that can assist the successful development of CMK for a full range of land uses.

What Ward Councillors said:

One Councillor comments that retail must cater for diverse communities, especially in CMK. Encourage building of small units for retailers whilst still encouraging the larger retailers to locate in CMK.

Another Councillor comments that the focus should be on CMK as a regional destination for retail, leisure and culture - not just retail. Decide on our aspirations for CMK and, if there isn’t enough space in CMK, decide which bits of the job spec could be located somewhere else. Identify CMK’s USP (unique selling point) - what is it that makes people choose to come here rather than other destinations - and protect and increase those aspects. The predominantly indoor retail and leisure offer is the biggest single positive differentiator that we can enhance (or we could ruin it eg. by promoting active frontages and a more outdoor shopping experience).
What MKC departments said:

One team commented that CMK should reinforce itself as a regional hub for shopping and leisure/cultural activity. Development should focus on maintaining strong transport infrastructure whilst providing a broad retail offer. CMK is a vital employment area and must be further developed to survive in this increasingly competitive market.

CMK in the future needs to accommodate local residents as well as acting as a regional hub, but the space available is finite. The shopping centres should offer a variety of stores, ideally with some independent shopping alongside chains. Office space needs to be of the highest quality. Need to better connect the leisure and cultural use and areas with the shopping, business and hotels areas to increase dwell time and raise spend locally.

Perhaps CMK needs a major concert hall or sports facility to bring in new visitors and raise its profile. The development of the University Campus will be important going forward.

Significant improvement in public space will improve perceptions of Milton Keynes.

What National/Statutory Organisations said:

The Highways Agency recognises that CMK already fulfils a more strategic role as a retail centre compared with other towns in the area and encourages MKC to consider implications of extending its reach through the development of transport evidence.

What Local Organisations/Interest Groups said:

The Parks Trust recommends integrating the development of CMK with maintaining the character of Campbell Park and facilitating good links between the two areas.

A local society suggests that CMK should be developed as a regional centre not just for shopping but also for bars, restaurants and other consumer enhancing items to increase its attraction. Improve access by modes other than the car should be a high priority. CMK should be a great place to visit and the public spaces should definitely be improved.

Another local campaign group comments that the whole paper seems weighted towards CMK as a regional shopping centre. Employment is key. Massive densification is also required from the Core Strategy. The CMK Business Neighbourhood Plan probably has the most comprehensive set of proposals to support prosperity as this is based on extensive consultation and research - you should give considerable weight to its policies although not yet formally adopted.

Need policies to promote more independent shops, restaurants and bars. Plan:MK must restore the role of CMK as a district and local centre as well as a regional centre - for the first time in its history, the Primary Shopping Area no longer has a supermarket, a better balance between convenience and comparison shopping is needed.

CMK needs more community rooms/halls for various uses to book space which might help to partly address the need for more activities for young people which don’t involve spending lots of money.
Has the question about increasing dwell time been written by planning agents for Hermes? The wording is almost that used to justify the need for the Primark extension. Certainly need to tidy up the public realm and make footpaths more inviting – CMK is the flagship of the Borough, it needs to recover from years of neglect to its public realm. If looked after and respected to keep CMK different, and attractive to existing and new generations.

There is constant pressure from developers to build closer to the boulevards. This is not welcome or necessary. The boulevards are not too wide, people will and do cross when they have a reason to do so.

**Question 2: Town Centre Policies**

- What retail policies need to be retained, amended or what new retail policies do we need in the future in Plan:MK to manage the growth and development of our town centres?

What members of the public said:

- Manage the development of CMK, it should be people not money led.
- CMK needs an appropriate amount of convenience shopping as well as facilities such as dry cleaning reflecting its residents’ needs and modern household trends.
- Essential; that town and district centres that are best served by public transport should also have the best retail facilities, especially convenience retail.
- Protect and enhance the outdoor market.
- Support places where people meet in our town centres eg open spaces, markets, cheap cafes, libraries.

What Town and Parish Councils said:

- It’s a fine balance between controlling town centres and stifling growth. CMK is boring, parking is expensive and unattractive.
- Leave it to market forces to determine what retail outlets are required and where.
- Flexibility needed to adapt to new retail trends like click and collect etc.
- Adhere to the policy of concentrating retail in town centres especially to support regeneration of older town centres

What MKC departments said:

Infrastructure Co-ordination recommends maintaining the current retail hierarchy

What neighbouring and other local authorities said:

Northampton Borough Council notes that the issue associated with PD rights (impact on the nature and mix of uses and supply/demand) should be investigated

What the industry said (e.g. landowners, developers, agents...):

Policies that restrict non-A1 retail units in the centre:mk should be removed - such policies are not in the spirit of the NPPF. Complimentary uses such as food are essential to support an evening economy. Policies need to protect the viability and vitality of CMK from inappropriate out of centre development.
Plan:MK needs to consider a range of shopping centres and retail facilities across the Borough, not just focussing on CMK. Areas such as MK1 have had a hugely positive impact on previously run-down areas and should be supported.

Disagree with the assessment of Denbigh North in para 48 of the Topic Paper - it was enabling development and has regenerated a run down industrial estate. It shows the ‘can do ’ nature of MK and has brought positive social impacts. MK1 should be supported equally to other developments in the city.

An up to date evidence base, including a capacity assessment, is needed to replace the Roger Tym Study.

What Ward Councillors said:

One councillor recommends encouraging residential development in CMK where it encourages vitality and activity. Make CMK a regional centre with a mix of facilities. CMK should also cater for the neighbouring estates. Improve the pedestrian experience in CMK, including better links to neighbouring estates.

What National/ Statutory Organisations said:

The Highways Agency notes that Core Strategy Policy CS4 can be considered suitable in terms of reflecting the Agency’s priorities and principles for locating development in sustainable locations.

Question 3: Retail Hierarchy

- Does the retail hierarchy in the Borough needs to change?
- Are there any centres whose role has changed since the last review of the hierarchy, whose position within the retail hierarchy needs to reflect this change?

What members of the public said:

- MKC needs to look proactively at its local centres - Bletchley especially needs attention. Wolverton has had more success encouraging small specialist shops and this should be supported by planning policy.
- The retail hierarchy seems to have had an adverse impact on CMK in terms of convenience retail - development has been allowed in district, local and edge of centre sites at the expense of CMK.
- CMK should appear in a list of district centres as well as being a regional centre reflecting its more local role as well.
- Kingston is too small to cope with the number of people who use it.
- Individuality is important - why chain stores everywhere? Need an area for small, independent stores.
- Olney really plays the role of a ‘town centre’ having a vital role as a service and shopping centre for its catchment. The retail hierarchy should be amended to promote Olney as a district centre.

What Town and Parish Councils said:

Flexibility is the key to enable retailers to respond to changing shopping patterns.
Stony Stratford town centre provides much more than just a retail offer and this should be reflected in its future designation in the hierarchy of the borough. The Neighbourhood Plan, once adopted, should be the driver for any Plan:MK policy for Stony Stratford town centre.

More support for Queensway, Bletchley is needed to offset the impact that MK1 is having.

**What Ward Councillors said:**

Two councillors comment that despite Stony Stratford never having been designated as a district centre, it does fulfil a function considerably in excess of a ‘local shopping destination catering for daily or specialist needs’. Stony Stratford should be considered a destination and possibly a ‘supplementary district centre’. Its catchment for shoppers and visitors extends far beyond the administrative confines of the town. It has, traditionally also served the south Northamptonshire towns.

Another councillor notes that the absence of larger shops in Conniburrow was a mistake when the estate was built. This needs looking at. Redevelopment of the Food Centre should be a priority.

**What MKC departments said:**

One team recommends focussing on creating links from rural villages to localised shopping and services provided by the older town centres to help meet daily needs.

**What the industry said (e.g. landowners, developers, agents...):**

Retain the existing retail hierarchy. Support CMK being the primary centre supported by a number of lower order centres.

The traditional application of the sequential test does not work in MK, so the Council needs a different vision for a highly mobile community. What will happen to the 1980s out of town shopping centres at Kingston and Westcroft; how can new demands of retailers be met; why is there only one food store in CMK?

**What Local Organisations/ Interest Groups said:**

A local society comments that the retail hierarchy does not need to change but care is needed in respect of Woburn Sands with the effect of EW Rail and any increase in traffic congestion and parking demand on the high street.

A local campaign group comments that planning decisions have ignored the retail hierarchy, resulting in a hollowing out of CMK as it has to compete with areas with free parking eg Oakgrove, MK1. This damages CMK as both a regional and district/local centre for residents.

**Question 4: Town Centre Regeneration**

- Should the Council be more proactive in supporting and facilitating town centre regeneration initiatives in Bletchley and Wolverton?

**What members of the public said:**
Yes, the Council should be more proactive. The Co-op store in Bletchley should not have been allowed to close down.

Central Bletchley poses an interesting challenge having lost its role a few years ago.

Wolverton has strength in small retail spaces (and low rents?)

**What Town and Parish Councils said:**

Agreement from a number of Parish Councils that the quality and viability of town centres is vital to those who live nearby and that MKC should be more proactive, although concern expressed as to what the Council can do to influence a fast changing market? Perhaps planning policies need to be more visionary rather than prescriptive.

Marketing an opportunity is the key - selling the 'place' and 'opportunities' rather than developing a fixed inflexible plan.

Concern was expressed by one Town Council that the refurbishment of the public realm in Queenway resulted in agreement with Highways on the material to be used - so why is it that repairs are not carried out in the same materials?

Regeneration is not just about the built environment but support is also needed for economic development, anti-social behaviour and social cohesion.

Support from MKC always seems to be in silos - more cross department working would help.

**What MKC departments said:**

One team noted that the economic downturn has slowed progress due to limited funds. Plans are underway currently on regeneration projects in both Wolverton (eg the Agora) and Bletchley (Fixing the Links project).

Another comments that residential development can play an important role in the regeneration of town centres. The Topic Paper is correct that regeneration requires dedicated resources from MKC but these resources are likely to remain in short supply for some time to come. MKDP might therefore provide the most practical way of supporting regeneration initiatives.

**What the industry said (e.g. landowners, developers, agents...):**

MKC should actively promote regeneration in Wolverton town centre. Any existing facilities lost through redevelopment (eg of the Agora) should be replaced in the town centre.

MKC should act as a catalyst to support town centre regeneration across the Borough to secure future prosperity. The Council needs to be proactive to both attract and retain investors’ confidence. Regeneration and change can be brought about through MKDP.

**What Local Organisations/ Interest Groups said:**

A local campaign group agrees that the Council should be more proactive but not at the expense of CMK.
Question 5: Town Centre Decline

- Are there any town centres in decline where redevelopment may be necessary?
- How should the Council manage the decline of a centre?

What Town and Parish Councils said:

Local councils should use Neighbourhood Plans and local initiatives to identify those town centres where action is required.

Netherfield suffers with people parking there and walking to the hospital. Encourage short term parking with money from pay and display being used to rejuvenate the centre.

Any pressure MKC can bring to bear on retaining shops and services would be welcome. Support for retaining local services that residents see as essential supports both the centre and the community.

What MKC departments said:

Infrastructure Co-ordination notes that Wolverton and Bletchley are in decline. Changing the use of buildings for the community can be a viable option. Retain services such as convenience stores and pharmacies will ensure that the centre continues to attract shoppers.

What the industry said (e.g. landowners, developers, agents...):

It is not only existing centres in decline that should be subject to redevelopment / additional investment. The PSA in CMK will need significant redevelopment over the timeframe of Plan:MK if it is to develop to its full potential.

Planning policy should protect the city centre as well as support new investment. Policy needs to be flexible to meet changes in market demand.

MKC can manage decline by re-evaluating its assets and releasing land owned by MKDP, or through the use of CPO (compulsory purchase) powers if key sites are not coming forward.

What Local Organisations/ Interest Groups said:

A local society notes that Woburn Sands High Street is a vibrant mixed use rural town but it is already showing the strain of the amount of development in the local area. There should be no further development until the effect on infrastructure can be fully assessed.

Question 6: Restricting Uses

- Should certain types of use should be restricted in some centres because they are becoming too dominant and/or undermining the vitality and viability of those centres?
- Should hot food takeaways be located away from schools, or not granted in local centres close to schools?
What members of the public said:

- Yes, MKC should be pro-active in ensuring a good balance of provision in all retail centres.
- Unhealthy food should be kept away from places that children frequent on their way to and from school if possible, but it is a mistake to equate ‘hot food’ with unhealthy food. Sweet shops are near to schools and these are unhealthy too.

What Town and Parish Councils said:

No - the market will decide. Businesses come and go and trying to restrict uses will be ineffective and could distort the market.

If hot food takeaways are not to be located near to schools - how close is ‘near’? What evidence is there to support such a policy? What about the local convenience stores that sell fizzy drinks, sweets, pies, buns etc?

Yes, uses in town centres should be restricted - the proliferation of charity shops especially should be controlled.

What Ward Councillors said:

One Councillor comments that hot food takeaways should not be tolerated near to schools. MK has a serious problem of obesity among young and older people. MKC should also consider policies preventing the proliferation of betting shops especially near or within areas of deprivation.

What MKC departments said:

Infrastructure Co-ordination notes that growth of certain industries such as betting shops can provide revenue but restrictions should be placed on how many can be placed within centres in order to promote viability.

Hot food takeaways should be located away from schools - MK has obesity rates above the national average and it would be sensible to prevent new developments having such facilities close to schools. Healthier lifestyles should also be encouraged eg more sport participation, walking, cycling and a reduction in car use.

What the industry said (e.g. landowners, developers, agents...):

Restriction on uses at the centre:mk should be lifted. A range of uses will enhance vitality and viability and increase dwell time. There should be no restrictions in the PSA in CMK. It needs a mix of uses to remain attractive to investors and visitors.

Overall the market and use classes order provide enough control of certain types of uses. But restrictions on use might be relevant in district and local centres which can be more sensitive to over concentration of certain uses.

Limiting hot food takeaways near schools would be unsound - no justification for this in the NPPF and it is not a positive approach to planning. There is a lack of evidence of the link between fast food, school proximity and obesity.
**Question 7: Provision of Local Convenience Stores**

- Should the Council still encourage the provision of a local convenience store in close proximity to new residential development?

**What members of the public said:**

Yes - the trend is for more frequent basket shops. A local store can also make basic grocery items accessible to the disabled and provide a focal point for the community.

**What Town and Parish Councils said:**

Yes - this is what people want as their weekly shopping habits change.

**What MKC departments said:**

Infrastructure Co-ordination suggests that MKC should do this as it promotes smart, sustainable settlements and can ensure access to grocery items for more vulnerable members of the community.

**What the industry said (e.g. landowners, developers, agents...):**

This should only be encouraged if of a suitable size which does not compete with larger stores and centres in the retail hierarchy.

If provided it should be of an appropriate scale to meet the day to day needs of the local population.

**What Local Organisations/ Interest Groups said:**

A local society comments that a convenience store on its own is often financially unviable unless combined with other retail facilities. This should be decided on a case by case basis.

**Question 8: Restricting food store sizes**

- Should the Council restrict the size of a food store permitted in an existing and proposed local centre and, if so, to what size?

**What members of the public said:**

Floorspace should no longer be relevant, but rather all retail should be assessed for its impact on the immediate and other local and district centre. Lidl and Aldi demonstrate how with relatively small floorspace, stores can attract weekly shoppers from a wide area with consequences for parking and traffic as well as for the viability of other stores in the area.

Trend to small scale retailers. There could be restrictions on floorspace with the condition that other services (pharmacy/post office) should be encouraged.

**What Town and Parish Councils said:**
Leave it to market forces and if it can provide more local and varied shopping opportunities for residents then that would be a good result.

Any store larger than 3,000sqm ceases to be a convenience store and becomes a supermarket.

The size of store should reflect the size and needs of the local community. Larger food stores should be located in town, district and the city centres.

**What MKC departments said:**

Infrastructure Co-ordination notes that there should be a retail impact assessment of stores over 1,000sqm.

**What the industry said (e.g. landowners, developers, agents...):**

Food stores in existing centres should accord with the capacity requirements for Milton Keynes and meet the requisite tests.

**What Local Organisations/Interest Groups said:**

A local society agrees that they should be restricted to the size of an average convenience store or other retail unit in the local centre.

A local campaign group also agrees and refers to previous comments re hollowing out of CMK.

**Question 9: Retail Impact Assessment**

- Should the threshold for a retail impact assessment be lowered from its current 2,500sqm to 1,000 sqm?

**What members of the public said:**

No it’s fine at 2,500sqm (and is in line with the NPPF)

**What Town and Parish Councils said:**

Yes, the market is leading to smaller stores so it would be useful to see local impacts but on a case by case basis.

Yes, if these thresholds had been in place we would not be firefighting the impact of MK1 on Queensway, Bletchley.

**What is the point of a retail impact assessment and what good does it do?**

**What MKC departments said:**

Infrastructure Co-ordination agrees that 1,000sqm would be a more sensible threshold

**What the industry said (e.g. landowners, developers, agents...):**
The proposed lowering of the threshold could bring an additional level of assessment which may not be justified or required in the majority of cases. There should be clear thresholds based on a thorough assessment of the existing offer going forward as using varying thresholds will create uncertainty.

Threshold should be based on allowing investment to take place in centres defined in the retail hierarchy.

Support retail impact assessment for all retail and leisure developments of over 1,000sqm outside of town centres. This will allow planned investment, eg in the CMK PSA to come forward. Evidence to justify a lowering of the threshold should come from a new retail capacity study.

What Local Organisations/ Interest Groups said:

A local society agrees especially where food stores are concerned. Another also agrees due to the rapidly changing nature of retail and impact on viability of town centres.

What members of the public said:

Most of the population increase in recent years has been in the BAME communities. Entrepreneurs and customers from the BAME (black and minority ethnic) communities might have a significant impact on our local and district centres.

'Pop-up' shops and 'meanwhile spaces' might allow new retail and cultural enterprises to emerge on otherwise declining high streets.

What Town and Parish Councils said:

Ensure that ageing population can still reach local shops, so make local centres large enough with the right level of facilities.

Parking - want a continuation of current policy not to charge for car parking in the older town centres.

What the industry said (e.g. landowners, developers, agents...):

Consider the contribution that other uses make to the vitality and viability of town centres, especially CMK and the PSA’s status as a regional destination. In order to enable the PSA to compete, the importance of food, drink, cultural and leisure uses should be highlighted. In that vein, restrictions on non-retail floorspace in the centre:mk should be lifted to reinforce its attractiveness and increase dwell time. Recognise the importance that local convenience retail could have in the PSA as a complimentary use that provides for the needs of residents and visitors.

The importance of car parking in CMK, in the form of MSCPs providing 'pay on exit’ parking, should be highlighted and reinforced through policy.
The chapter should make reference to the important role that the centre:mk plays in achieving a vital and viable regional centre. Retail capacity should be focussed in the PSA to maintain its status. Plan:MK should introduce a strict policy on development in out of centre locations; recent development in out of centre locations have created regional destinations in their own right, not in the spirit of the NPPF.

Update retail capacity studies

What Ward Councillors said:

One Councillor expresses surprise that site B4 isn’t designated a key site in the local plan proposals map. The site has been empty for too long. More needs to be done to encourage use of public transport for journeys into CMK, including making CMK more accessible from neighbouring estates. MKC needs to consider solutions to parking problems on CMK neighbouring estates.

What MKC departments said:

Infrastructure Co-ordination notes that the town centres in the WEA (and to a lesser extent the EEA) need to be incorporated into the retail hierarchy once information about this becomes available.

What Local Organisations/ Interest Groups said:

Big Local Conniburrow comments that in the original plans for Milton Keynes, CMK was to have a regional and district centre role, serving the surrounding grid squares (comprising the Central Housing Area) which were themselves only provided with minor local facilities, often just a corner shop. This situation is not working for the residents of Conniburrow and the other surrounding grid squares. Community facilities in the area are limited, where they are available in CMK, they are not easily accessible.

Conniburrow is especially missing a supermarket, nor is there a dry cleaners, launderette, out of hours pharmacy, dental or medical centre. Conniburrow has no parade of shops, pub, church, medical centre and no focal point where residents can meet. Most residents don’t regard CMK as their local or district centre.

It seems that development in CMK focusses on its regional role at the expense of its local and district centre role - Plan:MK needs to take a fresh look at how CMK relates to its surrounding grid squares.

Policy is needed to enhance the local facilities and distribution of some district centre uses in to the Central Housing Area estates, including the redistribution of some uses from CMK.

An SPD (supplementary planning document) should be prepared to review the relationship between CMK and the surrounding grid squares - this should be done as part of Plan:MK and the Regeneration MK strategy.
5 Transport and Travel

Summary

This Topic Paper covered issues including how to increase the number of journeys made by cycle, on foot and by public transport. It looked at how new developments could encourage more sustainable travel behaviour and reduce the need to travel as well as how they could contribute to the use of rail and capitalise on the additional capacity generated by East West Rail and HS2 (High Speed 2). It looked at how the impact of road-based freight movements could be reduced; how the planning system can secure contributions from development to support sustainable transport options; whether the principles of grid roads should be maintained; and whether speed limits should be reduced.

198 individual comments were received from 64 organisations and individuals. A wide range of opinions were expressed on the various questions and issues in the Topic Paper. There was some criticism of the lack of real suggestions as to how Milton Keynes can become more sustainable especially given how dominant the car is at present. An issue that was raised by a number of respondents on several questions was that of the inequality of access for those without access to a car and that these people are doubly disadvantaged by the lack of an effective and affordable bus service.

On the question of how best to encourage walking and cycling there was overall agreement that in order to achieve this it would be necessary to increase safety, surveillance and convenience. The difference between those who cycle for leisure and those who cycle to commute to work was highlighted with the suggestion that the introduction of direct 'super redways' would be beneficial to encouraging more people to consider cycling to work. Several respondents commented on the need for greater education of those using the redways to reduce conflict and accidents between different users. Similarly, key factors to increasing public transport patronage include provision of clean, convenient, frequent and cheaper bus services. Some respondents were seeking the introduction of guided bus/tram ways and there was recognition of the need for a critical mass of development (and hence, passengers) in order to make public transport services viable for the operators.

The development of East West Rail was generally considered to bring benefits to the area, although the lack of direct access to the West Coast mainline stations of Milton Keynes and Wolverton was felt by some to be a limiting factor to its overall success. HS2, on the other hand, was not considered likely to bring much in the way of benefit to the MK area. The need for a rail freight terminal in Milton Keynes was raised by some respondents as a way of getting freight off the roads. The need for off-road lorry parking to be provided in new warehousing/logistics developments was raised by several respondents.

On the question of grid roads, the majority of respondents wanted the grid road principles to be maintained and rolled out into new developments. Generally there was a dislike of the city street approach. There was less consensus on whether speed limits on grid roads should be reduced and a number of respondents suggested measures such as no right turns out of estate roads as a way of reducing accidents.

Overall Comments

What members of the public said:

Comments from members of the public can be grouped under the following headings:
General

- Stop buses running through estates - they disturb residents and are dangerous to children.
- General avoidance of difficult issues in the Topic Paper - there being no mention of SITS (the Sustainable Integrated Transport Strategy)
- Support the proposal for new developments to contain a mix of uses to reduce the need to travel out of those developments.

Need for modal shift/greater sustainability

- Topic Paper initially very supportive of sustainability.
- If MK cannot become sustainable due to original design, should it be allowed to grow at all?
- The Topic Paper contains no transport policy and no indication of how greater sustainability is to be achieved.
- The car is the dominant mode presently and the Topic Paper does not include anything to suggest that this will change.
- Environmentally, MK is the most extravagant of all UK towns due to car dependency but no mention of this in the Topic Paper - a serious omission.
- Should MKC promote safe and responsible use of headlights? Modern headlights blind pedestrians.
- Plan:MK needs to propose a series of transport strategies all based on the Council’s sustainability agenda - one option should be a SITS based solution. Options must set out their modal split, social, economic and environmental benefits and disbenefits.
- MK should work with others in SEMLEP to convert the Strategic Economic Plan in to reality.
- Could not find a reference to Park and Ride - P&R should be an integral part of modal shift.
- MK’s car dependency is encouraged by low density development - MK needs to evolve to build low rise, high density at between 100-150 dwellings per hectare.
- Successful planning relies on integrating transport with land use planning - the future shape of the city needs to follow a linear form along a public transport spine.
- There should be electric buses every 15 minutes from the station to Campbell Park in CMK.

Inequality/accessibility

- MK is, due to car dependence, a very poorly connected city and the Topic Paper is planning to keep it that way. About 1/5 of MK households have no access to a car. A further 2/5 have access to one car. The layout and transport system accentuate inequality.

Protect grid roads/roundabouts/original design of MK/respect car use

- Roads in the expansion areas need to connect with the grid system.
- Grid roads should not be slowed down but kept to 60mph; keep roundabouts and use underpasses for pedestrians. No traffic lights on any existing grid roads.
- Parking in the old towns (Stony Stratford, Bletchley, Wolverton etc) should remain free. Their High Streets are fragile and need to be protected.
- As MK expands outwards the non-dualled grid roads will need to be dualled.
5 Transport and Travel

- Once the WEA is occupied, the H1 should be extended as a bypass for Stony to prevent the town becoming a rat run.
- Alarmed at the lack of reference to roundabouts and lack of aspiration to remove some to enable more direct routes, e.g., from A5 to M1.
- Topic Paper makes almost no reference to the car, by which most journeys are made.
- All new major builds in CMK should have underground parking.
- Linear parks and redways should be extended into all new areas.
- Accept that many people don’t want to use buses; provide adequate car parking in CMK and reduce parking costs.

Impact of new development

- Concern that new development between Woburn Sands and Bow Brickhill would increase traffic along The Leys.
- MKC doesn’t want to build grid roads anymore, and public transport funding is cut.
- Recent track record of development poor - can understand idea of City Streets and Countess Way looks okay but concerned about Newport Road in Broughton and Wavendon.
- Building east of M1 would cause gridlock at Junction 14.
- Difficult, if not impossible, to understand Figure 3.
- All new houses should have two parking spaces; side roads should be wide enough for parking and traffic. MKC should canvass residents to find out what they want in terms of more/better parking.

What Town and Parish Councils said:

CMK needs a strategy to manage parking; promote modes other than car.

CMK Alliance Business Neighbourhood Plan promotes a CMK shuttle bus; a new public transport hub in CMK (Policy CMKAP SS3); as well as still providing adequate car parking (Policy CMKAP T4).

There is and will be an ever-increasing impact of traffic on quality of life, especially at peak time, which needs to be prepared for. The Paper does not address the lack of alternatives to the car and issues such as expensive bus fares.

Rail commuters report that traffic to MK station is congested even in the very early hours - fight to get a parking space; queue for tickets then fight to get a seat on the train. Using MK station is not a good experience - at night, lighting is poor and unsafe.

Working from home difficult due to poor broadband speeds.

What neighbouring and other local authorities said:

West Northants Joint Planning Unit supports measures to reduce the need to travel and encourage sustainable modes. To reduce the need to travel by car and enable access to a range of services, the Plan should consider enhancing links by public transport between towns and villages in West Northants and Milton Keynes.

What the industry said (e.g., landowners, developers, agents...):
The potential role of Park and Ride in helping to shape the overall transport mix for MK does not appear to be covered. Subject to detailed consideration of locations, the role of P&R is worth considering.

The questions raised in the Topic Paper are insignificant in relation to the overall challenge facing MK and the absolute requirement to achieve a modal shift from the car. As presently formulated, the Topic Paper does not adequately address this key issue.

New development needs to be located in the most sustainable areas; also unless cross border issues such as commuting into MK from adjoining areas are taken into account the Plan will be undermined.

Welcome proposals for a coherent plan to 2031. Note that the plan recognises that growth is essential if MK is to retain its place as an important regional centre and that it is recognised that a growth in demand for trips is a direct result of that growth.

What Local Organisations/Interest Groups said:

The MK Green Party commented that MK currently has one of the least sustainable transport systems in the country; to move from being one of the least to one of the most sustainable cities would take far more significant interventions than are proposed. They welcome the move towards Smarter Choices but felt there is a lack of Council commitment and support for this - many of the staff working in this area have been made redundant.

They welcome the development of the MKMMM (Milton Keynes Multi-Modal Model) and look forward to its use to aid decision making. In their view, in terms of road safety, especially on grid roads, the elephant in the room is high speeds.

If MK is to be genuinely sustainable and in order to address the impact that further growth will have, there will need to be a massive shift to non-car modes.

No mention is made of Peak Oil - Plan:MK needs to take account of this.

Question 1: Walking and Cycling

- What features can be incorporated into new developments to maximise the number of people walking and cycling, especially for short journeys?

What members of the public said:

- More direct cycle routes with fewer road crossings; redways should be well lit; well sign posted; clear sight lines and more secure. Lack of cleanliness/good lighting etc is a factor in under use of redways.
- The problem with the redways arises from the original plan for MK - they were conceived as leisure routes and designed to keep cyclists and cars separate but now that more people use them to get to work they want quicker and more direct routes (ie integrated alongside gridroads).
- Walking/cycling routes should be planned in from the start and should be more direct than roads.
- Danger of uncontrolled dogs and dog mess
- Need to educate redway users
Super redways might encourage more cycling
Paint a line on redways and educate cyclists to cycle on the left.
Reduce speeds on grid roads and paint a cycle lane on grid roads.
All offices to have shower and changing facilities
Charge for all parking in CMK and use money to provide subsidised bike rental scheme, plus better secured and monitored cycle parking in CMK.
Differentiate between purpose of walking and cycling i.e.: leisure and commuting - each has different requirements.
We need cycle only redways
Cluster uses together to encourage shared journeys.
Anticipate what form future vehicles might take and what infrastructure needs they might have.
More investment needed.

What Town and Parish Councils said:

Redway system should be extended as far as possible and included in new developments; increase its use by ensuring effective surface maintenance and improvements in lighting. A redway map would be useful. Redways are a fantastic resource but under utilised. Perception is that they are dangerous, but with more people using them, surveillance would improve. A suggestion was made to survey users to identify improvements - invest in surfacing and lighting; include cycle stores for apartments in the city centre and Campbell Park; more secure cycle storage in CMK; more involvement from local cycle clubs to get people started. A suggestion made to introduce separate lanes for cycles and pedestrians with a painted line.

Perhaps a deterrent to cycling to work is lack of secure, covered storage and changing facilities. Every new development should have these. For both walkers and cyclists - clearer signposting; better surveillance would improve feeling of safety.

Include mobility scooters as well as walking and cycling - well thought out routes; safe; clear of debris and vegetation; well surveilled; well lit. Take account of desire lines; gentle inclines only with hand rails. In Bletchley, need safe routes for cyclists where the redway system does not exist. Need infrastructure in place first to encourage walking - at the retail centres around Tesco; B&Q, Beacon etc it is safer to drive between the retail areas than attempt to walk.

More cycle lanes and pedestrian pathways needed - Moulsoe has neither on Newport Road to J14 or from the Cranfield end of the village to Cranfield.

What Ward Councillors said:

One Councillor commented that new neighbourhoods need to be designed so that the route on foot or bike is shorter than by car, as per the Residential Design SPD.

Two Councillors considered that in order to maximise journeys by foot and cycle, it would help to identify useful direct routes and clearly sign them; produce maps; better lighting; surveillance and surface improvements. Use linear park extensions for leisure routes. New development should be planned from the walking and cycling perspective from the start.

What the industry said (e.g. landowners, developers, agents...):
Convenience and safety are the most important factors to encourage walking and cycling. New developments should provide convenient; surveilled and safe links to facilities. Client’s site provides opportunities for walking and cycling by connecting to the redway system and creating a country park providing leisure routes.

One developer responding to the paper stated that they always seek to incorporate exemplar features for walking and cycling in new developments; facilities should be supplemented by a Travel Plan to ensure they are provided, maintained and enhanced.

The lack of significant increase in cycling is surprising. A contributing factor might be the lack of facilities for cyclists in existing office stock, so measures to encourage retro fitting might be encouraged.

New developments should be designed in accordance with Manual for Streets 1 and 2 and in accordance with the principles of walkable neighbourhoods. More direct cycle paths are needed to encourage cycling. The cycle network should remain physically separate from the road network.

What National/Statutory Organisations said:

The Highways Agency commented that to help maximise the number of people walking and cycling see “The Highways Agency and the Planning Application process, Appendix B”. Acknowledges that if MK expands outwards it may be more of a challenge to encourage walking and cycling trips but these should still be encouraged and appropriate infrastructure should be implemented in new development.

What Local Organisations/Interest Groups said:

One local society commented that redways are important but consideration could be given to separating walkers and cyclists. There is a need to change the perception that redways are dangerous by providing better lighting; increased surveillance etc.

The Parks Trust commented that strategically planned and well designed networks of open space such as linear parks can provide opportunities to encourage walking/cycling.

The MK Green Party stated that the redway network should penetrate into and across CMK - there is already a North/South route, need an East/West one. The redways should also extend out to towns and villages surrounding the MK urban area. Pedestrians and cyclists need legible, direct routes in new developments.

There is a need to educate pedestrians and cyclists how to use the redways. Paint a centre line down redways to reduce collisions and to smooth flows. Barriers on redways should be removed eg at Booker Avenue and Ibstone Avenue in Bradwell Common. Most estates should have 20mph speed limit to improve safety for vulnerable road users.

Plan:MK should make reference to cyclist and pedestrian safety on grid roads. Cyclists are allowed to use grid roads and MKC should make safe provision for them on all roads, including grid roads. Pedestrians are allowed to cross grid roads.
5 Transport and Travel

Question 2: Public Transport

- What would encourage more people to use public transport for more journeys?
- What could the planning system do to help make public transport more attractive?

What members of the public said:

- Need quick, convenient, cheaper and more frequent public transport, especially for non car-owners who rely on the bus
- Buses should have easy access for wheelchair and pram/buggy users
- Bus drivers could be more positive towards customers
- Encourage parents to build their child’s confidence using public transport
- Work with schools - have a week with the challenge to get to school without the car
- A tram system would be best but difficult to achieve given the average low densities across MK and the inability to provide subsidies.
- Build strategic developments closer to rail links eg EW Rail
- Buses need to go closer to where people work
- MK Central rail station offers a poor service to commuters - trains too infrequent, too short and little faster than 30 years ago.
- Significant investment and a clear vision needed to resolve fundamental issues.
- Understanding 'door to door' - section 11 of the Paper quotes a DfT document which lists public transport as a more sustainable 'door to door' choice. The whole point of public transport is that it isn't 'door to door' - unlike personal transport.
- For someone used to running a car, using a bus is a particularly poor experience.
- Compared to door to door transport (car, bike etc) buses provide very slow average journey time.
- Ways of improving the bus experience:
  - Have zero tolerance approach to buses not using RTPI - take them out of service
  - Buy bus tickets only before getting on the bus and have separate doors for embarking and disembarking.
  - For new developments create services that pick up in a few locations on the estate then run non-stop to key destinations.
  - See if we could achieve a 30 minute maximum time for home to city centre bus journeys.
  - The main bus operator seems lacking in commitment to excellence - can we improve this?
  - Achieving modal shift to public transport requires increasing restrictions on the motorist. Parking charges are low compared to other cities. Additional problems caused by the large price differential between standard and premium rate.
- Greater density of housing developments would improve the viability of public transport.

What Town and Parish Councils said:
A guided bus route or tramway based on a figure of 8 (inner and outer ring) using Marlborough Gate and Grafton Gate (inner ring) and Magna Park, V12 (outer ring) should be introduced. Develop high-level monorail to cover CMK, employment areas and park & ride

The bus service is still only good in parts with a lack of joined up services, scruffy buses and several under-used routes. Bus operators need to do more to improve the quality of experience. MKC should aim to become a Passenger Transport Authority, this would give us the power of a Regulator and have more control over the operators. There should be quick buses that only use the grid roads. Keep prices low and advertise this. Public transport must be user friendly, safe, quick and reliable and Operators need to look carefully at where people want to go and plan routes accordingly. Provide more connections between different areas so that not all journeys have to run through CMK.

Mass transit is urgently required to take the pressure off the roads and is a serious investment decision that must be taken now. The planning system should provide a frequent, as near door to door service as possible. Problem is funding this although MKC could identify alternative ways of providing public transport and invite the market to respond.

Improve rail services at MK rail station; improve station facilities

More frequent and cost effective bus services to rural areas.

What Ward Councillors said:

One Councillor commented that people will be more likely to use public transport if it starts from where they are and takes them to where they want to go.

Two Councillors noted that RTPI (Real Time Passenger Information) everywhere would improve bus use. Effective services to and from the workplace would build bus using habits. Extend public information (eg how the request stop on Crownhill works).

What MKC departments said:

The Infrastructure team comments that public transport needs to be reliable, cost effective, flexible, safe and comfortable. Travel information needs to be easily available and reliable and the cost of travel and journey times needs to be comparable and, ideally better than by private travel. Incorporate RTPI on key routes.

Provide public transport routes at the beginning of a new development helps to establish public transport travel patterns with residents. Routes are more viable if the link to/follow higher density areas.

More bus lanes would reduce journey times for public transport.

Consider infrastructure needed to support personal transport eg pull in laybys.

What the industry said (e.g. landowners, developers, agents...):

The convenience and regularity of public transport will encourage people to use it. Provide public transport in new developments from the outset to encourage bus using habits. Buses need to be on viable routes. New development needs to be in the right locations, with the
right catchments and sufficient density. In many cases new developments lack the critical mass to attract PT operators. This would be replicated if employment sites are dispersed through the urban area.

Extend RTPI system.

Implement bus priority measures at signals

Expand use of school buses to reduce private car use at peak times.

What National/Statutory Organisations said:

The Highways Agency suggests that planning developments in sustainable locations, close to the public transport network, within walking distance of bus stops and railway stations would encourage more use of public transport. Further encouragement could come from subsidies, promotions, better public transport infrastructure and more services being made available.

If the Milton Keynes urban area is to expand outwards, potentially increasing the distance between residence and place of work it will be important that public transport services are available and attractive to reduce car dependency.

The Council should develop a plan which maximises the potential to encourage trips by public transport in preference to the car. The HA encourages the Council to consider the potential for public transport use as part of its site selection process.

What Local Organisations/ Interest Groups said:

A local organisation comments that MK has to live with the fact that it was designed for the car. Unless buses can be made to go where people want them or there is real innovation in personal transport there is little to be done to get people out of their cars.

Another local organisation highlights concerns of inequality of access - residents without access to a car are poorly served by public transport. The ‘Fair Transport’ campaign supports a bus charter and community e-cars. This approach is also taken by the MK Green Party, who note that bus use is much lower in MK than in similar sized towns and that about half the residents of MK do not have access to a car all or part of the time.

MKC should lobby Government for bus services to be re-regulated so that the Council can ensure the appropriate bus services are provided. In the meantime set up Quality Contracts with the operators. Core bus services should be at least 4 buses per hour day time and at least 2 bph evenings and weekends.

The Green Party suggests a number of improvement measures including; improve bus information; provide orbital bus services around the periphery of the city; free bus travel within CMK; more frequent early morning and late evening services for workers; night buses; all buses on Midsummer Boulevard should run through Midsummer Place - through a tunnel above or below ground to keep emissions away from pedestrians; provide bus services to all employment areas; consider a light rail or tram system for the near future using grid road reserves and the CMK boulevards; provide good bus access to the hospital and all facilities.
The Parks Trust seeks an assessment as to how accessible key areas of open space are to people via public transport. This should form part of the open spaces assessment/green infrastructure planning work as commented on in the Open Spaces Topic Paper.

**Question 3: Personal mobility**

- How else can new developments encourage more sustainable travel behaviour and reduce the need to travel?

What members of the public said:

- No mention of Powered Two Wheelers (PTWs) which is very disappointing
- Apart from CMK there are few secure and no covered parking areas for PTWs - eg no provision at recent developments like the Stadium or Waitrose
- PTWs are a means for individuals to travel greater distances than on foot or bike and are quicker than the bus.
- Redway system needs a major expansion to include new direct routes alongside grid roads.
- Introduce fast and frequent bus services confined to grid roads. No bus lanes - remove existing ones.
- More grid roads should be dualled and 60mph limit on all dual carriageways (except the A5 trunk road) with secure central fencing to prevent jay walking.
- Cyclists need safe and secure facilities for bike storage
- All growth should be planned - no more piecemeal development
- The British have a culture of ownership and the car provides both personal space and convenience of door to door transport, with the absence of stress. Public transport, walking and cycling do not offer the same level of convenience and flexibility.
- One way to change culture would be to build new developments on the principles of Freiburg-Vauban where car owners have to park in a car park on the edge of the development and pay a high premium for the space. Everyone gets used to walking a little and it is quicker and easier to get into Freiburg city centre by tram rather than by car.
- For use around town, innovative transport like something mid way between an electric bicycle and a full blown car might be a model for personal transport in the 21st century - providing low maximum speed, low emissions and running costs, with some weather protection, some carrying capacity and the convenience of door to door transport.
- Major failing in MK is lack of a quick, efficient, green transportation system into CMK eg a tram
- If the car is no longer to be the main transport mode then a different city shape is needed - one favouring the linear characteristics of public transport with the incorporation of "hot spots". The Topic Paper does not address this.
- The MK grid was never meant to be self sufficient, rather, the redway connections to adjacent grid squares allow residents to move from home to whatever service they need. Flexibility was and should remain as one of the advantages of the MK system. The grid square also gives the psychological advantage of 'belonging' to a specific geographic area, reinforcing sense of place.
Concerns about under provision of supporting facilities at grid square level can be overcome by raising development densities. MK’s garden city approach is unsustainable - we need low rise high density.

- The Grand Union Canal is a commercial waterway.
- Minimal ability to enhance rail travel within Milton Keynes unless the place of work is Elder Gate.
- Need to publicise bus timetables.
- Almost zero opportunity to transfer road freight to rail.
- Car share could be facilitated by large employers looking at employee data and pairing off employees and adjusting working hours if necessary.
- MK congratulated for bringing the driverless vehicles and new induction coil charging buses.
- Electric vehicles should be massively increased and promoted. Target taxi drivers - consider grants for early adopters. Apps could allow customers to order an electric taxi to encourage take up.

What Town and Parish Councils said:

People need to travel for a variety of reasons. Superfast broadband influences some of these activities and so reduce the need to make some of these journeys. Broadband speeds in MK are nowhere near satisfactory and should be a priority for upgrading across the borough.

Need a localised centre with plenty of space for local users to park/cycle and walk to from their homes.

The bus companies and MKC have a duty to ensure that all communities have economically viable services, especially important in parts of the city with high levels of deprivation. It seems discriminatory if someone is unable to access a job through the lack of viable transport. More frequent and cost effective bus services to rural areas is also required.

MKC could look at alternative solutions such as Wheels to Work, community buses, dial-a-bus and volunteering schemes. Subsidising more vulnerable residents will be a necessary requirement.

What Ward Councillors said:

One Councillor comments that there is no point in living in a city if you restrict yourself to the amenities in your local neighbourhood. As MK gets bigger the total annual distance travelled by residents will increase faster than pro rata. We will achieve a more worthwhile result if we set the right objective - rather than reducing the need to travel it might be a better and more achievable target to reduce the total amount of carbon-based travel, especially if we can start to have access to non-carbon electricity.

What MKC departments said:

One team noted that providing public transport at the beginning of house building helps to establish patronage in travel patterns of new residents. Planning policy may need to facilitate developer contributions towards PT subsidy until usage levels move the routes into profit. Routes are more viable if they follow higher population areas - PT routes should therefore run through higher density housing areas.
Another team comments that alongside journeys to work, journeys are also important traffic generators. There are opportunities to encourage more walking and cycling to school through good design, by ensuring that schools are centrally located in school catchment areas, together with clearly defined, direct routes to school. Co-locating schools with local centres or other public spaces can provide car parking space if parking facilities on school premises are at capacity, so reducing the impact on nearby streets. This can also help to increase footfall at local centres, improving their viability and vitality.

It was also commented that the success of MK based on a number of factors, especially the grid roads and recognition of the importance of the car. The Council’s approach should not be to try to design out the car. Technological and societal changes may still bring about many of the benefits that we are currently trying to achieve. The Council should seek to improve capacity on the road network to bring about:

- Dedicated and physically separated cycle and electric bike lanes running alongside the grid road
- Dedicated bus lanes, again alongside grid roads
- Improvements to roundabouts eg reducing height to make it easier to see over/round them.
- Use the grid road reservations to introduce these changes.
- Ensure that future road provision follows a grid road pattern. Speed limits should not be introduced but instead measures to make the system safer.

Funding could be secured in a number of ways (eg prudential borrowing, SEMPLEP funding). Alternative passenger systems such as monorails are unlikely to be affordable.

**What the industry said (e.g. landowners, developers, agents...):**

Provide people with as many options as possible, including easy access to rail services to be provided by the East-West rail link. To achieve this, new developments needs to be located in appropriate locations, easily accessed by this route.

Location of new development is key to encouraging use of sustainable modes of transport. Strike the appropriate balance between reducing reliance on the car and providing high quality employment locations, easily accessible to markets and employees.

A major gateway into MK for commuters is M1 J14. As long as suitable capacity can be provided to cater for likely demand, it makes sense to locate as many of the jobs required in Plan:MK as close as possible to this gateway. This gateway location is also attractive to B8 distribution uses.

**What National/ Statutory Organisations said**

The Highways Agency suggests that a Travel Plan would promote and encourage sustainable modes of transport other than the car, along with improvements to walking, cycling and public transport.

The Canal & River Trust advocates the use of the canal towpath as a sustainable transport route and encourages new links to it from new development. The towpath may need improvements to ensure that it is fit for purpose and the cost of this should be borne by the new development. An audit of possible sustainable transport routes should be carried out when a development location is considered and any necessary improvements identified should be included in the development scheme.
What Local Organisations/ Interest Groups said:

A local society notes that little can be done to apply the necessary levels to change behaviours beyond providing employment areas within new development; extending redways and grid roads for flexibility.

The Parks Trust notes that adequate provision of green space reduces the need to travel for day to day recreational needs.

The MK Green Party is seeking a Safe Routes to School programme covering all schools. Redways into new housing developments should be constructed before first occupation. Speed limits on residential roads should be 20mph. The Council has a duty to make all roads (including grid roads) in MK safe for all types of traffic including cyclists. Speed limits on grid roads should be reduced to 50mph. The Workplace Parking Levy should be introduced to raise funds to improve public transport, cycling and walking and to provide a disincentive for people to drive to work.

The local group, Big Local Conniburrow, raises concerns that proposed developments in CMK will have adverse effect on parking on Conniburrow adding to commuters who already park here. Public transport is a further concern - a very limited bus service fails because of its infrequency and limited destinations. The young and fit walk to CMK but the elderly and infirm rely on taxis at considerable cost. The local medical centre is at the far end of Bradwell Common - too far for the more vulnerable to walk.

Question 4: Sustainable Travel

- How can we ensure that sustainable travel is at the heart of all new development proposals?

What members of the public said:

- Sustainable travel encouragement could take the form of more subsidised charging stations in public areas, and also have them installed in commercial premises’ car parks. People need to be confident that electric vehicles will allow them to complete a round trip.
- Provide protected and secure cycle storage.
- Do more for road cyclists - MKC should not be telling cyclists that ‘cars do not expect to see road cyclists on these roads’
- Slow Milton Keynes down to make it safer for cyclists.
- Redways not suitable and dangerous for road bikes - badly maintained, glass, pedestrians with headphones, dogs etc. Educate people about how to use the redways properly.
- Further growth of the city needs the vision of the New City founders, to plan and implement the necessary infrastructure before development.
- In favour of low carbon, low cost and likely, low speed vehicles, using either ‘super redways’ or grid roads (with reduced speed limits)
- Unconvinced of the benefits of ‘pods’
- Electric buses are hampered by the same disadvantages as normal buses and are also noisy (continuous high pitched whine for passengers).
Car share impact reduced by dispersed layout of MK. There are opportunities for sharing but these are best organised by large employers.

Beware of Planners who don’t understand how MK works.

Need to see innovation that fits the low density of MK, not the other way round.

SITS is a perfectly reasonable route map to facilitate MK’s transition away from a high carbon situation but SITS is unused. Plan:MK provides an opportunity to engage with SITS and evolve in a more sustainable direction.

The Duty to Cooperate could provide a basis for an imaginative way of addressing national and wider than local issues including tackling infrastructure shortfalls.

Concentrating urban expansion in a few locations sub regionally could have the benefit of focussing investment on a single area.

Instead of driverless pods from MK station to CMK, how about a cable car or some form of overhead suspended transport.

What Town and Parish Councils said:

Ensure new developments have redways and easy access to bus routes and bus stops.

Ensure that buses not only go from one shopping centre to another but also connect to parks and schools.

What MKC departments said:

One team notes that there is little that the planning system can do to guarantee sustainable transport choices.

What the industry said (e.g. landowners, developers, agents...):

E-W Rail - developments adjacent to the railway line would be in a sustainable location and would promote a modal shift eg for commuters to Oxford and Cambridge. Access to the Oxford-Cambridge arc would benefit the MK economy. More work is needed to ensure that we integrate the city into the E-W Rail corridor.

A flexible approach should be taken to ensure the most cost effective solution to be incorporated into new developments.

Create a critical mass of employment in a single, high quality location as this is more likely to lead to a popular public transport destination than several dispersed sites would.

Welcome any initiatives that support sustainable travel but these have to be balanced against the needs of the development. Transport Assessments and Travel Plans already form a core part of significant planning applications.

Agree that larger expansion areas are likely to be better able to deliver public transport improvements and new neighbourhood centres which help to reduce the need for people to travel especially by car.

What Local Organisations/ Interest Groups said:
The MK Green Party suggests tackling car dependency, eg using car clubs; travel planning. Introduce the Work Place Parking Levy. Reduce grid road speed limits. Don’t build new roads such as the Olney bypass and the Southern bypass. Oppose new M1 junction 13a. Generally do not support Park and Ride - it encourages driving; does little to improve social inclusion as it only benefits those who have a car and will undermine scheduled bus services.

**Question 5: Rail**

- How do you think new developments can contribute to the use of rail and capitalise on the additional capacity to be generated by East-West Rail and HS2?

**What members of the public said:**

- The East-West Rail link will be welcome but as it seems unlikely to be in operation for 10 years fail to understand how it can be considered in Plan:MK.
- The East West transport corridor would be a huge step forward, enabling commuting to Oxford and Cambridge and bringing the MK area into the knowledge based economy. It could reduce traffic entering MK as people commuting from the west may find rail preferable.
- A faster MK to Bedford train service would be a cheap and easy to implement service. Introduce an express train to Bedford via Woburn Sands, Ridgemont, Woburn, taking less than 30 minutes.
- The risk with HS2 is that its need for passengers may mean that long distance services will be removed from MK. Urges MKC to lobby against HS2.
- By contrast to Reading (new station, fast and frequent service) MK Central has a small station with a minimalist service.
- Bletchley station needs a major upgrade as part of East-West Rail. It must be designed as the gateway to the city of Milton Keynes and facilitate future growth in passenger numbers, particularly to Stadium MK.
- Would like to see a metro/light rail system; fares would need to be affordable to everyone.
- Not clear what the figures in paragraph 94 refer to. Rail competes better with other transport modes over medium to long distance journeys.
- Increasing capacity to cope with commuting demand is a huge challenge for operators as their investment (in extra rolling stock, longer trains etc) is only required for a small part of the day.
- Re-opening the line from Verney Junction to Buckingham would also be useful and could allow Buckingham to develop into a medium sized town.
- Would be sensible to locate some housing development along the East-West Rail route eg at Winslow.
- Don’t see HS2 bringing any opportunities for locating new housing development within the immediate MK area.
- The unreliability and slow journey times of buses means that they do not support rail travel from Milton Keynes - it doesn’t make sense to spend 45 minutes on a bus to catch a train that can get you to London in 30 minutes! Need to drive to the station to get there on time, but parking in CMK is very expensive. Taxis aren’t really an option either other than for a small group as they are too expensive.
What Town and Parish Councils said:

Any suggestion of increasing development around Woburn Sands as a result of East-West Rail should be vigorously opposed. The adopted Woburn Sands Neighbourhood Plan gives an agreed development framework for the area and the settlement will lose all its identity and character if forced to expand. Conversely a view was expressed by another Parish Council that expansion and development should be concentrated along the EWR route.

East West Rail should be linked with all areas of MK through the city centre and onwards to Bedford and that areas that are not on the railway line should be linked by a shuttle bus/tram service. However, as EWR is planned to be delivered by end of 2017, unless there are planned to be new developments in the next three years, it is difficult to see what benefit this can bring to the future plan for the expansion of Milton Keynes.

HS2 only has the potential to free up capacity on the West Coast Mainline for more services calling at the three MK stations.

Connecting services and warm, clean and welcoming stations and waiting areas are the key to increasing passenger numbers. Extending the Bedford to Bletchley line to Wolverton including a stop at CMK would also help.

What MKC departments said:

The Infrastructure team notes that public transport routes should link to the stations on EWR. There is scope for new development along the EWR route to incorporate new platforms or for the development of new freight facilities with associated commercial development. Future visitor destinations could also be aligned to EWR.

What the industry said (e.g. landowners, developers, agents...):

Provide railway stations in appropriate locations where they will offer new and existing residents an alternative mode of sustainable transport, for example, development at SWMK is adjacent to the EWR route. The nearest station will be Bletchley. Locating development close to rail and other public transport corridors will encourage people to use non-car modes for some or all of their journeys.

New developments need to be strategically and sustainably located to allow the MK economy to thrive. EWR and HS2 will enhance economic prosperity by bringing greater connectivity to the area. Development should be located with these key infrastructure projects in mind.

What National/ Statutory Organisations said:

The Highways Agency comments that provision of feeder modes to enable future residents and employees on new developments to access rail services will be crucial. The Platinum 300 service is a good example of a high frequency, high quality bus service which links more peripheral parts of MK with the railway station. MKC should explore opportunities to ensure that new development is well connected to inter-urban rail. Take advantage of the likely future benefits of East West Rail running to the south of Milton Keynes, offering the potential for inter- as well as intra-urban journeys by rail.

It may be more difficult to achieve good access from sites to the south, south-east and east of Milton Keynes to the West Coast mainline, but this should be considered in future site selection assessments.
What Local Organisations/Interest Groups said:

One local society notes that it is difficult to see how clustering development around Woburn Sands will be of benefit to MK travel and transport. Any increase of passenger use of EWR is likely to be minimal as it route to Bletchley and Bedford and not CMK. Clustering development around Woburn Sands will have considerable disadvantages. Additionally, Bow Brickhill station will not see any increase in capacity and so there seems to be little benefit in increasing development in this area.

The MK Green Party supports EWR and supports extending Bedford-Bletchley service to MKC station. MKC should campaign for the Leighton Buzzard - Luton railway to be re-opened to provide a fast and reliable pt link between MK and Luton. Part of this route is being used for the guided busway. There should be a Sunday service on the Bedford to Bletchley line. No rail station on the east side of the city - Magna Park for example should have rail access for freight and passengers.

Question 6: Freight

- What more can be done in new distribution and industrial developments to reduce the impact of road-based freight movements?

What members of the public said:

- Freight should be encouraged to move by train at night
- MK should have a goods station
- New warehouse developments should provide adequate on-site HGV parking for visiting HGVs to park overnight. Off-road HGV parking has been reduced in recent years.
- More should be done to move freight on the canals

What Town and Parish Councils said:

HGV parking in employment areas is a problem. Lorry park areas with rest rooms and catering facilities seem to have been scrapped. We need sites for lorry parks, and new warehouse developments should have secure, on-site lorry parking.

Use the rail network and possibly a local air strip.

All freight needs to end up on the roads - freight transport needs to be reflected in national policy.

Where possible, industrial development should be made to fit within existing highway capacity and present or future rail links.

What MKC departments said:

The Infrastructure team suggests that a new freight/road interchange should be considered.

What the industry said (e.g. landowners, developers, agents...):
Road based freight is a key component of the UK economy. Road based freight movements are, though, best kept away from local distributor roads where possible. Allocate more employment sites in strategic locations, close to major routes and junctions, that maximise the ability to achieve this, ie. close to the M1 and the trunk road network.

Technological advances are allowing reductions of freight emissions and improvements in efficiency.

What National/ Statutory Organisations said;

The Highways Agency comments that freight management plans such as movement restrictions and alternative routing could be considered in order to reduce congestion on the strategic road network. Milton Keynes has the potential to increase its position as a major hub for industrial and warehouse distribution land uses with associated increases of HGV traffic on the surrounding road network, including the M1 and A5. Expect a forthcoming transport evidence base to assess the impacts of these types of employment use and the traffic they generate.

The Agency encourages MKC to explore any opportunities to transport freight by rail eg EWR in the future, and exploiting any spare capacity on the West Coast mainline.

The Canal and River Trust comments on the lack of any reference in the Topic Paper to the possibility of carrying freight by water despite several wharfs in the area being protected for freight use. Waterways can be useful for carrying freight and especially waste and building materials. Successful examples include the Olympic Park and the Guardian Media Group HQ at Kings Cross.

What Local Organisations/ Interest Groups said:

A local society does not support further logistics and warehousing development as they contribute little to the economy - providing only a few and generally low-skilled jobs relative to the footprint they occupy. Do not support more off-site lorry parking - lorry parking should be provided on-site. Do not support SEMK’s proposal for a rail/road interchange at Aspley Guise/Husborne Crawley.

The MK Green Party suggests that there should be a rail freight terminal in MK. The warehouses at Magna Park should be rail connected with an intermodal rail freight terminal nearby. More roads in MK not on the Lorry Route Network should have weight limits introduced, as discussed in the MKC Lorry Management Strategy 2008.

**Question 7: Funding**

- How can the planning system ensure that contributions to sustainable transport options are guaranteed and easily secured from development proposals?

What members of the public said:

- Devolve more power to the regions. The Department of Transport does not provide value for money and the majority of funding goes to London.
- The current planning system is unable to deliver our transport/infrastructure needs.
The Government is “unwilling” and not “unable” to fund... and so we have a compromised transport system.

A couple of years ago there was several million pounds funding for cycling developments in MK but where is the evidence that this money is being spent.

We need all party commitment to the continuous investment that both public transport and cycling require.

Continue the S106 process. Encourage the developer and occupier with tax breaks, help with employment hiring and other localised discounts for staff.

What Town and Parish Councils said:
The development tariff needs to be large enough to pay for infrastructure to support development.

What the industry said (e.g. landowners, developers, agents...):
Contributions to sustainable transport options are normally secured using S106 agreements in the form of service level agreements for public transport and Travel Plans. These can include bonded sums to fund bus services.

Support continued use of S106 and CIL. The system would benefit from more transparency on where the money is spent and clear links between the development providing the funding and the improvements implemented. What happens to unspent money should be made clearer.

What Local Organisations/Interest Groups said:
A local society comments that this is a political decision. Understand the current planning constraints ie developers claiming financial viability issues and MKC not having the resources to challenge this.

What MKC departments said:
The Infrastructure team comments that developer contributions could be used to support sustainable transport options/public transport and support innovative design. This could include examples similar to those in Campbell Park where cycle storage was designed for recent apartment developments or the provision of electric charging points.

**Question 8: Grid Roads**

- Should the principles of grid roads be maintained? Should speed limits on grid roads be reduced?

What members of the public said:

- Unnecessary and undesirable to reduce speed limits on grid roads
- Yes, grid roads should be maintained, they allow rapid transport across the city for cars and buses and have space for future mass transit.
- Grid roads reduce noise for residents
- They provide wildlife corridors
- The Topic Paper devotes more space to anti-grid roads than the pro argument.
Reduce speed limits.

Maintain grid roads but reduce speed limits - to 60mph for dual and 50mph for single carriageways.

Expand and dual the grid roads

There should be no bus lanes or priority to buses at traffic lights

Traffic needs to be free flowing - unmanaged traffic lights on roundabouts should be peak time use only.

Grid roads should be limited to core routes; all other routes should support mixed use such that cars, buses, cyclists and walkers all mix with open acknowledgement of each other (the City Street concept).

Concerned about increasing traffic jams in MK.

The plans for the WEA, city streets and foot bridges/pedestrian crossings over the V4 leave a lot to be desired.

Grid roads improve mobility and access for motorists but reduce it for anyone relying on public transport or wanting to use lower speed vehicles.

The high speed on grid roads is an issue when turning onto a grid road out of an estate road. This is not just an issue for accidents but a major cause of anxiety and stress for motorists.

The insistence of some motorists to slow to only to 30-35mph at roundabouts is dangerous and reduces opportunities for others to safely join them, increasing queuing. Reducing speeds at roundabouts would help to reduce congestion.

Useful to know how many journeys on the A421 are by motorists travelling right through MK. If the proportion is high then consider upgrading that route.

Future technology might include intelligent speed limits used in cars.

The capacity of the grid road system may be nearing its limits and it is difficult to think of any effective off-road transport system down the grid roads.

Grid roads provide the flexibility that a low density, dispersed city like MK needs.

What Town and Parish Councils said:

Maintain grid roads. Do not replicate the mistake of city streets. One Parish Council suggested introducing “No Right Turns” onto all grid roads.

At peak times the grid roads are at capacity causing long queues at roundabouts, delays and increased energy consumption and pollution. This situation needs to be addressed now. The grid roads need to be constantly extended and improved, city streets decisions in the WEA need to be reversed.

No speed limits on grid roads. The comprehensive Review of Personal Injury Collision Trends in Milton Keynes (2014) unambiguously demonstrates the number and severity of accidents at junctions on 40mph rural roads and where exceeding the speed limit, aggressive driving or young drivers are contributory factors. Accidents directly associated with grid roads are greater for vehicles turning right on a dual carriageway and accidents not related to speed but rather driver error. This could be addressed by eliminating right turns.

What Ward Councillors said:

One Councillor stated that all evidence suggests that MK is hugely successful (including in terms of road safety) and the grid system is the single biggest differentiator between MK and the areas it is out-performing, so the grid system should be retained and enhanced. It should be extended into new estates.
If MK ever has high serious accident rates then these need to be investigated. Individual junctions and road could be reviewed if they have high accident rates. But reducing speed limits could lead to impatient drivers driving through residential areas with increased risk to pedestrians.

Two Councillors believed the key features of the grid roads include - navigation via the H/V structure rather than landmarks; separation of cars from cyclists, pedestrians and housing developments; relatively fast, direct roads; landscape corridors. Issues that have emerged include - some dangerous turnings that have been closed; some fatalities due to high speed; difficulties operating an economic bus service; isolation due to separation of housing from the transport network.

Review what has been learnt from the city street in the EEA.

**What MKC departments said:**

The Infrastructure team commented that the system as it is should be largely protected in its original form albeit with allowances for upgrades as necessary such as junction improvements, possible intersection signalisation and dualling. New developments on the fringes of the city should be served by grid roads but developments need a hierarchy of roads to enable connected communities and ease of access to facilities.

**What the industry said (e.g. landowners, developers, agents...):**

- The grid road network is one of the key facets of Milton Keynes’ success and a strong reason why business, leisure and residents choose to locate here. This network must be supported and maintained wherever possible, with the maintenance of the current speed limit essential to its success.

- Future development around MK should respect the grid road heritage but needs to be relevant to the needs of today and the next 40 years. Support alternative road layouts on a case by case basis for new developments.

- If the requirement for a link road between the A4146 and A421 is to be carried forward in Plan:MK and it remains desirable to remove through traffic from the surrounding villages then a grid road through the proposed development at SWMK should be supported.

**What Local Organisations/ Interest Groups said:**

One local society made comments that grid road principles should be maintained as they provide the flexibility to explore other forms of transport that the city street design does not do.

Speed limits should be reduced except on main through routes like the A421. All other grid roads should have a maximum speed limit of 40mph.

The Parks Trust comments that if Plan:MK considers development in grid road corridors, this should only be at places of connection with adjoining grid squares where there would be public benefit in improving the quality and safety of pedestrians and cyclists using
overbridges and underpasses and ideally will occur on both sides; it does not harm the capacity of the grid road corridors to accommodate the movement needs of future generations and the remaining overall character of the grid road is one of a green setting.

The MK Green Party notes that high speeds on grid roads makes it difficult for buses to turn out from laybys and estate roads and is especially difficult for buses turning right onto a grid road. Bus drivers are under pressure to keep to schedules and are therefore under pressure to take risks when pulling out. Speed limits should be reduced from 60/70 mph to make the roads safer for all users - suggest one speed limits for all grid roads of 50mph.
6 Rural Issues

Summary

This Topic Paper covered issues relating to the rural areas of the Borough including; the implications of population structure; transport and accessibility; services and facilities and the ongoing viability of towns and villages; employment and the rural economy; housing targets; affordable housing; rural exception sites; settlement boundaries; design policies for dwelling extensions; the natural environment; and sustainability. Overall 121 individual comments were received from 34 individuals and organisations.

A good response was received across all the questions within this paper with many issues eliciting a range of responses, often with little consensus, and in some cases with distinct divides over support for opposing viewpoints. The key issues that received comment related to housing, transport and accessibility, services and facilities, employment, and the review of settlement boundaries.

There was a general view that there is a need for policies to promote the vitality of settlements to address the issues relating to an aging population structure within the rural area and the implications this existing demographic structure has, and will have, on the need for housing, public transport and accessible facilities and services. Several responses also highlighted the need for more detailed studies of rural communities providing a holistic consideration of all factors, not just age.

In terms of housing, there was a general consensus amongst members of the public and Town and Parish Councils that there should remain a separate housing target for the rural area and whilst there was no consensus on a target figure it was generally considered that figures should be based on the local community and access to services and facilities. Responses received from the industry however countered this by arguing that separate housing targets for the rural and urban areas are no longer appropriate.

There was also a mix of responses in relation to affordable housing provision and, whilst the industry response noted that requiring affordable homes on smaller sites can affect the viability of such developments and these sites should therefore be exempt, the remaining responses provided a mix of support both for a 15 dwelling threshold and a need for a lower threshold.

One of the most contentious issues related to settlement boundaries and the principles that should shape their review. A number of members of the public and Parish and Town Councils commented that reviews should be based on local needs and community views, however the key points raised by industry responses highlighted that a full systematic review of settlement boundaries should be carried out and provided a range of principles the review should be based on including, the objectively assessed needs of the area and ensuring boundaries do not arbitrarily restrict suitable and sustainable development on the edge of settlements.

With regard to transport, there was a split between all respondents as to whether development should focus on settlements with existing access to public transport or not, with a number of reasons being put forward to support the two viewpoints. Another viewpoint also suggested that planning should instead be focusing on minimising the need to travel.
Town and Parish Councils provided a wide range of ideas as to how Plan:MK should support the viability of rural towns and villages and protect against the loss of services and facilities, however the clear consensus from industry responses was that the provision of new housing within villages is the key to creating a more balanced population profile, leading to increased demand and support for local services and facilities.

The key points raised in relation to employment focused on supporting the conversion and re-use of rural buildings for employment uses, and the need to provide policies that support business development both in home working and small business units through provision of land for small business units, provision of high speed broadband, and assisting rural businesses to grow in a sustainable manner.

Finally a number of questions which drew less overall response found that there was minimal support amongst respondents for small numbers of market houses to be allowed on rural exception sites to enable the delivery of affordable units; that there is general support for design policies covering rural dwelling extensions; and, amongst members of public, Town and Parish Councils, and local groups there is general support for policies to be included that would assist in improving energy efficiency in rural houses and support community energy projects.

**Overall Comments**

**What members of the public said:**

- A full survey of trunk networks must be obtained from the various statutory undertakings (e.g. water supply, sewerage, gas, electricity, transport etc.) to include capacity for additional development, detail of “pinch points”, areas of ample capacity, plus estimates of how capacity at “pinch points” can be enhanced. This should assist in assessing impact of different development sites.
- Plan:MK should include no housing development in rural areas aside from Newport Pagnell, Olney and Woburn Sands. Existing poor public transport to rural areas and likely further cuts due to cuts imposed on Local Authority expenditure increases fear of further social exclusion for rural areas.
- Initiate revival of railway at Olney (Bedford - Olney - Northampton); would improve commuter travel through North Beds and Northants and provide capacity for growing number of commuters from MK to London.
- Any essential growth in the rural should be spread around more rather than focussed yet again on three villages.

**What Town and Parish Councils said:**

- Support the continuation of Policy CS1 and the settlement hierarchy within this policy.
- Support the continuation of Policy S10 and concentrating development within and adjoining existing settlements.
- Support the continuation of Policy S11; protection of areas with county-wide landscape value.
- Policies protecting and enhancing village facilities are absolutely vital to the well-being of the villages and should not be weakened. Where possible MKC should acquire additional powers to require maintenance of these facilities.

**What Ward Councillors said:**
6 Rural Issues

The need for broadband and support for businesses and jobs applies to the rural area as much as in urban areas.

**Question 1: Population Structure:**

- What implications does the age structure of the rural areas have for Plan:MK?
- What policies are needed to address those challenges?

What members of the public said:

- New smaller houses should be encouraged in settlements with a high proportion of older residents, so as to attract younger people.
- Need to ensure Hanslope doesn’t become a sterile environment with an ageing population. Policy should promote vitality of the settlement by ensuring it creates opportunities for all age profiles and restricts growth which leads to further increases in ageing population. Should allow sustainable development in sustainable locations to assist.
- With aging population in rural areas, we need to plan for better support for people to remain in their own homes.

What Town and Parish Councils said:

Two Councils said that there is an impact on the continuing need for a good public transport service and accessible services. Policy should support transport and accessibility to doctors’ surgeries, dentists, shops etc. and the need for ancillary services.

General challenges that need addressing are: transport, housing, health and education services, flexible elderly and young, single person housing, work-at-home housing and commercial units, with specific needs determined locally. Policies should produce more balanced demographic distribution and sustainable communities.

Implication cannot be properly assessed without a more holistic consideration of other factors (e.g. do the younger population belong to the ‘live here, work elsewhere’ inhabitants?).

With aging population in rural areas, Plan:MK should ensure a suitable supporting infrastructure, in terms of appropriate social and medical support, is in place (e.g. sheltered or warden assisted units).

What Milton Keynes Council departments said:

Implications for Plan:MK of current age distribution in rural settlements is not straightforward. Villages, hamlets and market towns have choices with regard to their future as outlined in the Taylor Review. Plan:MK should continue with the current rural exception sites policy and continue the work that is underway with local communities through the Neighbourhood Plan process to identify where/how new housing and related facilities can and should go.

What the industry said (e.g. landowners, developers, agents...):
The high proportion of those aged over 65 in rural areas is likely to make these areas unrealistic options to those who might want to live there, but find shortage of housing and lower turn-over of dwellings is restricting supply and pushing prices up.

There should be a sensible and logical spread of development across the rural areas generally, rather than in two or three larger settlements, so that every village may benefit from small-scale organic growth, meeting the needs of local communities and allowing them to benefit from social effects of an influx of new residents.

**What local organisations/interest groups said:**

A more detailed study of communities is needed, taking into account more inclusive parameters and communities’ existing resources to see the implications age structure would have; it is unclear when considering age alone.

**Question 2: Transport and Accessibility**

- How can planning help support the rural public transport network?
- Should developments be focused on settlements that have access to public transport to help encourage sustainable travel choices?

**What members of the public said:**

More frequent buses at a reasonable cost to provide an alternative to the car. Focus development on settlements with access to public transport and improve it.

**What Town and Parish Councils said:**

- Development should be focused on settlements that have access to public transport;
- Planning can support rural public transport by keeping up-to-date with need.
- Development should take account of accessibility to public transport routes particularly logistically efficient routes to schools and centres with a good mix of shops and services.
- Planning should reduce/minimise need for transport e.g. by ensuring provision of superfast broadband to ensure more viable commercial enterprises and innovative social and health care services. MKC should support voluntary transport services and retain village stores and services in innovative ways.
- No need to focus development on settlements with existing good public transport, not a major constraint given only 5 out of 27 settlements are categorised as ‘poor’. ’Chicken and egg’ situation, if settlements develop, public transport providers will be more interested in providing service.
- Not necessarily a need to focus development on settlements with existing good public transport. Development in areas with good services could have a detrimental impact on other settlements, rural area should be considered holistically.

**What Milton Keynes Council departments said:**

Makes sense to focus development on settlements with access to public transport to encourage sustainable travel choices.

**What the industry said (e.g. landowners, developers, agents...):**
More housing growth in villages to support higher public transport provision and frequency. Villages should be expanded to accommodate sustainable growth.

Planning can support the rural transport network by securing appropriate infrastructure and the imposition of realistic tariffs on development, which can be directed towards funding rural public transport.

New development should be focused on settlements with greatest access to public transport to encourage sustainable transport choices, however this should not stop development elsewhere. Rural settlements will struggle without a degree of organic growth appropriate to their size.

What local organisations/interest groups said:

Supporting the commercial rural public transport network is not a prime function of planning, unless Town/Parish Councils wish for development for that reason e.g. using s106 monies to support an existing service. Rural exception sites of affordable homes to retain local residents in the community is a planning function and part of this process looks at access to local infrastructure including public transport.

Development should be focused on settlements that have access to public transport, whilst not the only reason, it should be a factor to encourage its use.

Question 3: Services and Facilities

- How can Plan:MK support the ongoing viability of its rural towns and villages?
- How can planning help to protect against the loss of essential rural services and facilities?

What members of the public said:

Development of Tickford Fields Farm would help sustain existing, and be capable of providing new, community infrastructure for current and future residents in and around Newport Pagnell.

What Town and Parish Councils said:

- Plan:MK can support ongoing viability by providing: adequate shops for both food and personal items (chemist, post office, hardware etc.), adequate parking, open spaces, café/restaurant/public house facilities, and covered bus stops.
- Planning can help protect against the loss of essential services by listening to the people and their needs, and utilising Town/Parish Councils to pass information on.
- Support viability of rural settlements by requiring planning obligations from developments to provide infrastructure to maintain viability.
- Recognising that rural and urban residents have different priorities in services and through providing essential services (e.g. bus subsidy) to rural areas rather than a ‘one size fits all’ approach to all of MK, will help prevent loss of services and facilities.
- A robust planning attitude to change of use and, to a lesser extent, sympathetic attitude to infrastructure development (e.g. health care expansion) can partly prevent loss of essential facilities.
- Plan:MK should look to guide the planning process for new development to consider providing or supporting low cost retail units to ensure rural communities have access to ‘general stores’, as part of the criteria for assessing sustainability.
- Parish and Town Councils are best placed to make an input.
- MKC should consider how some services are delivered (e.g. mobile as opposed to static) and provide incentives where necessary.
- To protect against loss of services, planning should ensure economic viability and a ‘live here, work here’ approach.
- Develop vision about what technology is capable of delivering in coming years (e.g. superfast broadband is a requirement, not a ‘nice to have’). For some services technology may be part of retention solutions.
- Maintain population of villages to help reduce loss of services. Public transport provision, subsidised or otherwise, can also help.

**What the industry said (e.g. landowners, developers, agents...):**

New housing allocations should be provided in villages to ensure a more balanced population profile; this will then support local services and social infrastructure for all ages.

Rural areas have become no more than residential dormitories with no/limited local facilities or services. There is an increasing pressure for affordable and private housing to increase demand for local facilities.

Plan:MK should include flexibility to ensure services in better-equipped villages can be supported by sufficient local residents. This will not be helped by promotion of standalone settlements or an urban extension.

Plan:MK can play a vital role by recognising that development, which brings new people into these communities, can help underpin important local services and facilities which might otherwise close.

Through use of appropriate policies the planning system can protect against the loss of such uses by introducing a structured approach to the redevelopment of such sites based on evidence of, for example, marketing.

**What local organisations/interest groups said:**

Plan:MK can help by creating affordable homes in villages with good public transport access and existing facilities.

Encourage communities to take up designation of community assets and right to buy if threatened with loss.
Question 4: Employment:

- Plan:MK should include policies to support sustainable growth of all types of businesses and enterprise in the rural area (para 28 of the NPPF). How can planning policies ensure that businesses in the rural area grow in a sustainable manner?
- Should we encourage the conversion of redundant farm buildings for alternative uses?
- What can Plan:MK do to support the rural economy, and the viability of rural businesses?

What members of the public said:

- Encouraging rural leisure activities (e.g. equestrian activities) supports a wide range of rural support services.
- Encourage conversion of redundant farm buildings for alternative uses, but only where character is preserved.

What Town and Parish Councils said:

Support the continuation of Policy E5; encouraging the re-use of rural buildings for employment purposes.

Support the continuation of Policy E6; allowing necessary new employment buildings as part of farm diversification.

Planning policies are unable to deal with some of the issues faced by farmers (e.g. low price farmers paid for milk). A food pricing structure could help to support the rural economy.

Policies allowing conversion of redundant farm buildings for alternative uses should also be reversible.

Support policies for business development both in home working and in small business units at appropriate sites.

Biggest factor to support home workers and embryonic businesses and thus the rural economy is broadband and its upgrading.

Conversion of redundant farm buildings is a suitable use for them.

Rural areas feel uncertainty about the future of their surroundings. Policies must give confidence to make long term investment a viable option.

Providing suitable land and low cost commercial units to provide retail or commercial activities which are sympathetic to and in harmony with local surroundings (e.g. garden centres, agricultural support units etc.) should be part of the criteria for assessing the sustainability of new rural developments.

Support the conversion of redundant farm buildings for alternative uses.
Policy should reflect local needs for commercial premises in tandem with any housing development, too avoid too many commercial units and to increase the proportion of those who ‘live here, work here’.

Change of use should be utilised to promote viable clusters of similar enterprises, or a variety, depending on needs and distribution of business types across neighbouring rural areas.

The conversion of redundant farm buildings for alternative uses should be encouraged where appropriate and needed. When change of use is applied for, a strong case must however be put forward for regarding the buildings as ‘redundant’, so as to avoid proliferation of new farm buildings which can later be claimed as ‘redundant’.

Not mentioned in the Topic Paper is support for appropriate sport/leisure enterprises (requiring space for particular terrain), small farm uses (e.g. for specialist crops), and businesses unsuitable for urban areas (kennels, catteries, abattoirs), all of which serve the urban population. Perhaps the model of cities being sustained by their ‘hinterlands’ providing resources could be adapted for 21st Century.

Viability of rural businesses should not however be the reason for new housing development.

**What the industry said (e.g. landowners, developers, agents...):**

Ensure highest speed internet connections across the town.

Sustainable rural businesses are an essential part of the matrix of local services that can be supported by local residents.

Planning policies should assist businesses in the rural area to grow in a sustainable manner, by; being supportive of local businesses and enterprises that employ local people; and through allowing businesses to expand (within reason) on the site where they are based, without fear of needing to relocate.

Conversion of redundant farm buildings for alternative uses is currently covered by GPDO (General Permitted Development Order) and therefore having policy would introduce unnecessary duplication.

Policy should adopt a positive and permissive approach to the expansion/growth of rural businesses as well as fostering a diversity of business uses on agricultural units as part of the tried and tested approach already available to planning authorities in the form of rural diversification.

**What national/statutory organisations said:**

New facilities needed to support the Grand Union Canal, such as marinas, chandleries and boatyards may be need to be created within rural areas. It is important that Council policies are supportive of such uses.

**What local organisations/interest groups said:**

Permitted development which allows extension of buildings should be reflected in policies to encourage business expansion, providing no damage to the rural, physical and aesthetic environment of the community.
Farm diversification should be encouraged, caveated to those buildings erected prior to 2006 (to prevent exploitation) and subject to a transport assessment. However, care needs to be taken to prevent inappropriate development in the open countryside.

Ensuing high speed broadband is rolled out as quickly as possible will help support rural economy and viability of businesses.

**Question 5: Rural Housing Target**

- Do you agree that Plan:MK should include a separate housing target for the rural area distinct from that for the urban area?
- If yes, what do you think this should be? 85 houses per year, or higher to allow for migration?

**What members of the public said:**

Housing target should be kept low at 85 dws/yr to maintain focus of development in MK. Continued expansion of the few service centres will spoil what has attracted people to the area.

No issue with separate targets but, number of new homes should be strongly influenced by an assessment of capacity, including availability and suitability of land and potential for development to assist delivery of new community infrastructure. Target should be higher than 85 dws/yr to allow for migration and to ensure necessary critical mass of development to deliver new infrastructure.

**What Town and Parish Councils said:**

One Council felt this was a difficult question as not all rural areas are the same. For example, infilling should suffice in smaller villages, whilst larger villages should be assessed on an individual basis. Services should be the main concern rather than giving a number for housing requirements.

Another said yes, but separate housing targets should be based on the nature of the community and village’s character, size and proximity to other communities and services, in consultation with Parish Councils. Target could take the form of a percentage of existing housing stock if availability of land sustainability allows.

It was also said that a separate target should be maintained to ensure pressure from urban shortfall does not impact on rural areas. Outside key settlements, housing targets should be set through neighbourhood plans not imposed externally; local communities will want some development to maintain facilities but imposed targets can negatively impact on the character of the settlement.

**What Milton Keynes Council departments said:**

Higher target of 210 dws/yr as set out in the SHMA should be adopted. 85 dws/yr would not necessarily meet local needs.

**What the industry said (e.g. landowners, developers, agents...):**
Redevelopment of previously developed land for housing purposes in the rural area should be supported as a principle. Any rural housing figure should be on top of this provision in the overall housing figures, or separate.

The distinction between urban and rural in MK suggests it is appropriate to have separate housing targets. The rural target should be seen as a minimum delivery, not a cap.

Separate housing target acknowledges the differing issues for the rural areas and allows greater flexibility to support local services and businesses.

No, as the three key settlements all constitute sustainable locations for development which should not be constrained by a low rural housing target. No longer a need to have split targets as the NPPF presumption in favour of sustainable development allows Council to assess proposals against these criteria and resist development in inappropriate rural locations. Rural towns have strong links with MK and provide an opportunity for deliverable and sustainable growth taking away reliance on deliverability of urban expansions.

If a target is identified, it needs to be realistic, addressing not only basic need against supply, but also including an allowance for past under-supply in the rural areas. Planning for only 85 dws/yr and not planning for migration needs seems illogical. With growth migration to MK is a reality and it is critical that rural provision accounts for this as well.

A separate target would restrain the ability of Plan:MK to deliver aspirations of the NPPF to secure a thriving rural community. It is also an inflexible mechanism which will inhibit the plan from responding to changing circumstances.

Is it not appropriate to continue disaggregating housing delivery between urban and rural areas, for the purposes of calculating five year land supply. A number of appeals shows that a lack of an overall five year land supply outweighs a disaggregated approach.

What local organisations/interest groups said:

No there should not be a separate housing target; having a total for the rural area permits presumption in favour of development if the total is not reached, with a detrimental impact on the rural environment.

1,650 per annum, as concluded by the SHMA, is the appropriate figure.

**Question 6: Affordable Housing**

- Should Plan:MK introduce a new threshold that would trigger the requirement for affordable housing in the rural area? Should this new threshold be smaller than 15 units?
- Should Plan:MK plan for more larger sites in the rural areas that would provide a fair share of affordable dwellings?

What members of the public said:
The threshold should be lowered, perhaps as low as 9 or even 6 houses. Outside of key settlements and selected villages it is rare to find developments of 15 or more houses. The existing 15 house threshold is therefore tantamount to saying no more affordable homes in rural villages. Therefore in many settlements, it unlikely that any affordable housing will be built unless a large development is opted for, which is overly limiting.

15 unit threshold appears adequate; can’t see the benefit of larger sites if there is a 15 dwelling limit.

What Town and Parish Councils said:

A new threshold, lower than 15 units should be introduced. Plan:MK should not plan for larger sites until all other sites have been taken up.

Support the existing threshold of 15 units. With forthcoming large scale developments in Newport Pagnell and Olney, it is unnecessary and out of character to build larger sites in the remaining rural areas in order to create more affordable homes.

The amount of affordable housing depends on need, so thresholds are not necessarily appropriate. Large sites are not a prerequisite for affordable housing, they can often be problematic, whilst small sites can deliver affordable homes and provide local trades with employment.

Moulsoe would be unsuitable.

What the industry said (e.g. landowners, developers, agents...):

The threshold of 15 units would seem to balance opportunity and affordability

Different thresholds for different parts of the Borough are unnecessary, a flexible approach, considering each site on its merits and taking account of market conditions within the rural settlement should be provided. Announcement by the Housing and Planning Minister, to exempt small sites from affordable housing requirements, should be given regard.

Should await announcement on Government’s intentions on possible restrictions, preventing affordable housing being levied on sites of less than 10 units. Evidence suggests requiring affordable homes on smaller sites can critically affect the viability for such developments, resulting in no new housing in the rural area, to the detriment of communities. Affordable homes should be secured through larger developments, community led schemes and exception sites, therefore Plan:MK should plan for more, larger sites in the rural areas at a scale to support affordable housing provision rather than try to levy affordable housing on smaller sites.

What local organisations/interest groups said:

Yes, there is a need for affordable homes in the rural area and 15 units is too high. Suggest threshold is lowered to 10 dwellings. Lowering the threshold to 10, this should deliver what rural communities need, without the need for the allocation of larger site; which should not be planned for.
Question 7: Rural Exception Sites

- Should small numbers of market houses be allowed on Rural Exception sites, at the local authority’s discretion, to enable the delivery of affordable units?

What members of the public said:

No, unless affordable units are genuinely available only to local residents - greater benefit would come from encouraging small houses and bungalows to encourage downsizing.

Exception sites will only benefit locals on the housing waiting list - if more are built than there are locals meeting the criteria to be on the list, they are likely to be offered elsewhere and not address local needs.

What Town and Parish Councils said:

No; they should go through the normal planning system, not at the local authorities’ discretion.

May be appropriate but only part of a Neighbourhood Plan and following completion of a full needs survey.

Affordable homes were built on a site in Moulsoe some years ago; another site is neither suitable nor necessary in the foreseeable future.

Affordable housing depends on local needs and low building costs. Imposition of other rigorous policies will push up cost.

What Milton Keynes Council departments said:

The most effective way would be to plan for larger sites in the rural area that would provide a fair share of affordable dwellings; smaller thresholds may make schemes unviable. Therefore allow appropriate amounts of market homes to make schemes viable.

What the industry said (e.g. landowners, developers, agents...):

Exception sites should be additions to appropriate allocations for villages.

The NPPF is clear that there are circumstances whereby allowing some market units as part of an affordable scheme can help make them viable in the rural areas, therefore introducing a local policy to endorse this is unnecessary.

What local organisations/interest groups said:

In part yes, but be constrained by a policy ensuring 80% must be affordable, and up to 20% can be market homes.

Question 8: Design:

- Should Plan:MK have specific design policies for the rural dwelling extensions?
6 Rural Issues

What members of the public said:

Yes - strongly believe that all development should have specific design criteria, to avoid
devaluation of environment with ‘anything goes’ design.

What Town and Parish Councils said:

Plan:MK should not have specific design policies for rural dwelling extensions.

Yes; such policies should also be adopted for areas of the urban MK where architectural
integrity is a feature.

Yes; The Parish Council’s most common responses to planning applications are related to
ensuring design is sympathetic to adjacent buildings and the character of the village.
There are examples where inappropriate materials and designs have been accepted.

Yes; there are numerous examples of overextended houses within the rural areas.

What the industry said (e.g. landowners, developers, agents...):

Simple guidelines relating to materials and massing would be appropriate to assimilate
development into its setting.

What local organisations/interest groups said:

Policies should be no more than that for urban extensions and permitted development.
All extensions should be subservient to the existing building and in-keeping with the area.

Question 9: Settlement Boundaries

- What in your opinion should be the main principles that would shape the
  settlement boundaries review process?
- Do you think that your town/village boundary needs to be reviewed in order to
  support the delivery of future development?

What members of the public said:

Needs flexibility to respond to local needs. Proposed designation of very small villages
(e.g. Lathbury) as “open countryside” effectively bans any development and freezes the
chance to develop, condemning the villages to a lingering death.

The development boundary of Olney needs reviewing in order to support the delivery of
future development. Specifically to include the site at Lavendon Road for which the
principle of development has previously been established.

What Town and Parish Councils said:

Settlement boundaries should be a matter for residents of the settlement, unless an
over-riding requirement is identified by the Borough. Residents of Woburn Sands were
clear in support of existing boundaries as their experience shows there is a finite limit to
the scale of development within a settlement determined by elements such as retail
provision, education and medical services.
Emberton village boundary does not need reviewing to support the delivery of future development in the foreseeable future and should remain a small village settlement. This is a matter for Parish Councils based on local needs and community views.

Moulsoe is currently open countryside; there could be grounds for a boundary being established, even if it brought forward a little housing development, only if it helps head off larger development.

Three key principles; Settlement boundaries should not be changed without the support of a Neighbourhood Plan; any change should maintain the integrity of the village layout; and the character of the village at its entrances should be maintained if not enhanced.

A review of Castlethorpe boundary is not necessary at this time.

What the industry said (e.g. landowners, developers, agents...):

Main principles to shape settlement boundary reviews should be an assessment of capacity of the settlements and the influence of recent development, since the last boundary adoption, which has increased the extent of the settlement. Existing infill sites are likely to have been filled during last plan period and therefore ability of other settlements to support five year land supply will be determined by appropriate expansion of settlement boundaries. Western Underwood should be reassessed and expanded.

Main principles to govern a review of settlement boundaries should be;

- Do current boundaries allow sufficient flexibility to support sustainable development and potential changes in needs, across the Borough and within each community individually?
- With evidence of a shortfall in sites to deliver residential development in rural areas, under current policy approach, should current development boundaries be relaxed to support appropriate levels of delivery to meet existing or enhanced targets?
- Do development boundaries create an arbitrary division between adjacent sites that may both be suitable for sustainable development, regardless of the existence of a line on a map?

Settlement boundaries should be shaped to accommodate housing and employment growth which has been objectively assessed; they should not be constraints to appropriate sustainable development.

Principles for revision should include flexibility in and around settlements with the better range of available services. Castlethorpe boundary is currently drawn too tight.

A fundamental review of saved Policy S10 with reference to the NPPF should be the starting point. If a policy of rural restraint is to be continued, settlement boundaries must be subject to a systematic review to ensure they are appropriate to present day land use context and coincide with the developed envelope of a settlement, so as not to risk undermining development opportunities that may exist without changing the built form within a settlement. A partial review would risk polices being found unsound; Plan:MK must provide a thorough re-appraisal of MK’s development context and current and emerging national policy.
A full review of all settlement boundaries is the only comprehensive way of identifying appropriate sites for development in the rural areas. Key issue in reviewing boundaries should be the identification of sites that help rural settlements grow organically, providing additional dwellings without fundamentally altering character or appearance.

Review of Wavendon settlement boundary is important in order to identify land suitable for development over the plan period.

Settlement boundaries should not be used as a mechanism to restrict otherwise sustainable development. Their use fails to plan positively for objectively assessed housing need and arbitrarily restricts suitable and sustainable development (which would help meet the housing needs of Milton Keynes) from coming forward on the edge of settlements; this does not accord with the positive approach to growth required by the NPPF. Plan:MK should adopt a more permissive approach to development in the open countryside.

Principles that should shape settlement boundaries are; the need to meet objectively assessed needs of the area; promoting viable communities in the rural areas to deliver housing to sustain existing population and maintain a suitable demographic balance; and to maintain a five year land supply. Impact of expansion on character and quality of rural communities is likely to be less than that from development on remaining open spaces and high density development.

Hanslope village boundary needs to be reviewed.

What local organisations/interest groups said:

Settlement boundary reviews would have been preferred as a standalone process rather than being driven by housing targets or links to the Site Allocations process and the imposition of developer led decision making. Main principles should be; working with Town and Parish Councils so changes are supported by the community; impact assessment of changes on infrastructure, transport, environment including identity; and full weight given to any Neighbourhood Plan, complete or in progress.

Settlement boundaries of Woburn Sands, Wavendon and Bow Brickhill do not need reviewing in order to support future development.

**Question 10: Natural Environment**

- What would be an acceptable method of both improving and benefitting from the ecosystem services?

**What Town and Parish Councils said:**

An acceptable way to improve and benefit from the ecosystem service would be to make sure that all infrastructure is in place to support development before it starts.

Promise of continued protection of rural characteristics is welcomed.

Using land for bio-fuel reduces arable acreage; solar power is a better option but siting can be problematic.
Some farms have already diversified and further diversification, as long as it does not increase heavy traffic or detract from character, would be supported.

**What the industry said (e.g. landowners, developers, agents...):**

Plan:MK could require minimum energy standards in all housing.

**What local organisations/interest groups said:**

This question has less to do with the natural environment and more to do with energy production which we would only consider on a case by case basis due to their negative impact on high grade farmland, biodiversity and the natural environment.

**Question 11: Sustainability**

- How could Plan:MK help to improve energy efficiency of the existing rural housing and could Plan:MK include policies that would support community-run renewable energy developments?

**What members of the public said:**

Yes - Plan:MK should support community run energy projects

**What Town and Parish Councils said:**

Whilst most rural people expect to have a colder house than people in towns, any help to improve energy efficiency is always beneficial.

Make grants available to improve energy efficiency (e.g. insulation and solar panels)

Include policies to support community energy projects.

Replacement/redevelopment of housing might be the best way of improving energy efficiency for some buildings.

**What the industry said (e.g. landowners, developers, agents...):**

Would like involvement in the preparation of the Landscape Character Assessment

The visual and landscape impact of community-run energy schemes are identical to commercial ones, so it would be prejudicial for a policy to state a preference for community run schemes.

**What local organisations/interest groups said:**

Provide grants to rural housing and flexible planning policies to allow solar roof panels and other community owned and managed renewable energy schemes that do not impact on the historic or natural environment.
Summary

This Topic Paper covered issues including delivery of utilities, broadband and transport infrastructure; how reserve sites might be used more flexibly; community facilities and education provision; and general issues around funding and prioritising infrastructure, facilities and services. 84 individual comments were received from 38 individuals and organisations.

Responses to the paper were mostly positive with regards the continued use of reserve sites and their role in providing resilience against future needs (although there was not an overall consensus on the potential to be more flexible in the uses that might be suitable on such sites), and the importance of delivering high speed broadband infrastructure and the role that developers might play in that. Several respondents identified the difficulties in maintaining the ongoing viability of community facilities, and contributed their thoughts on the sorts of facilities that are essential to developing sustainable communities and walkable neighbourhoods. Education and the provision of sufficient school places was also discussed, including the need to ensure sufficient capacity is reserved for extensions to schools, and ways of supporting the Further Education sector in Milton Keynes. The majority of responses however considered wider infrastructure issues, including potential funding mechanisms and what types of infrastructure should be prioritised.

Question 1: Broadband

- Should Milton Keynes Council include a similar policy in Plan:MK, which puts the responsibility for providing the infrastructure necessary to deliver high speed broadband with the developer?
- If so, how could that requirement be managed (e.g. through conditions or legal agreements)?
- Or should provision in new developments be delivered by other means, as with the existing, established parts of the Borough?

What members of the public said:

- Poor broadband stifles the growth of businesses.
- If possible, we should enforce developers to deliver broadband. Suggest that grid roads/redways/linear parks may provide an opportunity to plan data connections across the city.

What Town and Parish Councils said:

One Council stated that the provision of high speed broadband is vital to support economic viability in older towns.

Several Parish Councils support a policy of developer delivery of broadband infrastructure as it is now seen as an essential utility, with one wanting to see MKC ensure free wifi access in all communal facilities and encourage it in all commercial facilities. They believe legal agreements may be a more effective means of managing the requirements, with
punitive penalty charges for delay and non-provision, with a review of the efficacy of provision in existing areas should be undertaken to see what works best, where and why. It was felt that delivery should be a pre-requisite to any occupation.

One Council however believe that technology moves so fast that broadband is likely to be superseded, so provision should stay with existing providers and phone companies, with another highlighting some of the difficulties in broadband delivery, particularly in areas where there is no commercial case. They suggest that legislation is needed to dictate that new development must have access to FTTC (Fibre to the Cabinet) or FTTP (Fibre to the Property), but are concerned that developer costs will just be pushed to the housebuyer.

What Ward Councillors said:

One Councillor said that existing ‘market provision’ is unsatisfactory, and would support a policy to require developers to provide fast broadband infrastructure on new sites. Others believed the best possible broadband is essential to encourage homeworking and e-learning.

What Milton Keynes Council departments said:

One team believed that to meet the targets for universal high speed broadband, we will need developers to provide infrastructure in new areas, so MK can concentrate on improving existing infrastructure. Legal agreements would ensure requirements are met, and should reflect the standard of broadband required. Another said that subject to viability issues, delivery of broadband should be by way of a legal agreement.

What the industry said (e.g. landowners, developers, agents...):

One developer noted that they already provide necessary broadband infrastructure wherever it is viable and adds value to the development, as a reflection of how important it is to businesses. Developers who do not incorporate provision will lose out to those who do. As provision is reliant on cooperation of suppliers, legal agreements would be inappropriate as not providing sufficient flexibility; existing incentives should be sufficient.

A local agent noted that the Central Bedfordshire policy is still emerging and not yet tested at examination. They consider the approach to be overly prescriptive, may stifle the evolution of technology and that costs may affect development viability.

What local organisations/interest groups said:

A local society said that broadband infrastructure is as necessary as any other utility, but the existing ‘market’ approach is not working. They consider delivery by the developer should be by way of a condition, but there may be a need to resort to a legal agreement if there is persistent non-delivery.
Question 2: Reserve Sites

- Should we be more flexible about the sorts of uses that are considered appropriate on reserve sites?
- Should this only be on vacant sites in long-established areas, or should potential uses also be more flexible on new reserve site allocations?
- Are there any alternative uses that Reserve Sites could be put to?
- Do you think that the principle of residential development on Reserve Sites is acceptable?
- Should all new reserve sites be time-limited, so if a community-type use cannot be found within a certain period (c.10 years) the site is returned to the original landowner/developer?
  - Or should reserve sites remain available in perpetuity, until they are required?
- Should we consider allocating larger Reserve Sites?
- Should we even continue to allocate Reserve Sites, considering a large proportion of them remain vacant and unused?

What members of the public said:

One respondent said that reserve sites should be worked into an overall plan so that even if unused they serve a purpose in providing open space in a development.

What Town and Parish Councils said:

One Council believed we should be more flexible about the sorts of uses that are considered appropriate, but housing and commercial uses should be ‘last resort’. They said that this should be the case for existing and new sites, although more flexibility should be afforded to vacant sites in long-established areas where a use for the site has not previously been identified. They supported the continued allocation of sites, consider they should be retained in perpetuity to allow for unforeseen needs to be met, and that regular reviews and temporary uses should be considered. Finally, they agreed that we should consider allocating larger reserve sites.

Another considered that all reserve sites should be reviewed on a bi-annual basis to consider which uses are currently suitable on a site and which are impractical, and if a wider assessment shows a lack of need for the site, then it should be returned for business or residential use. This bi-annual ‘culling’ would ensure periodic releases of land and avoid areas becoming derelict at cost to the taxpayer. They felt that residential uses may be acceptable if complimentary to their surroundings, and that further reserve sites should continue to be allocated, especially important in large developments.

One Council believed that sites should remain for the benefit of the community and any development, either in a community or commercial way, should be giving a benefit back to the resident community. Another however believe that there should not be more flexibility about uses, and undeveloped sites should be used for informal play/open space.

What Ward Councillors said:
One Councillor supported the idea that much larger reserve sites should be set aside, closer to planned or existing facilities, and that there should be sensible time limits for development of reserve sites, allowing for growth.

**What Milton Keynes Council departments said:**

One team suggested that Reserve Sites could be considered for other uses if there are already sufficient facilities available and the change won’t adversely affect the public. It was felt that any possible uses must accommodate the needs of the community, and the effects of the ‘clawback’ position could also be mitigated through such consideration. Further, they said that residential development would only be acceptable where there are already sufficient local amenities and green space, and the infrastructure can cope. They said that the use of short time limits can adversely affect the land usage in the long run as future needs will not always be apparent, however having reserve sites available in perpetuity may mean sites are not given high priority status and could therefore remain unused for long periods. They therefore considered that reserve sites should continue to be allocated, with viable yet flexible roles, and consideration of the use of larger reserve sites to account for a wider range of community needs.

Another team recognised the value of reserve sites as locations for multi-use, publicly accessible facilities, and meeting additional needs for specific sports and community projects. They also felt that time-limiting would restrict future development. They supported larger reserve sites to accommodate uses which might otherwise struggle for sites, and which might help enable projects to deliver the International Sporting City strategy.

Other teams supported the ongoing allocation of reserve sites, including larger sites, to remain available in perpetuity. They also believe there is a need for greater flexibility and to make it clear that residential uses would be acceptable, not just the one use that is identified as a preferred/prescribed use in the Local Plan.

MKDP believe that sites should be retained for uses that have a probable need within the Plan period, and alternative appropriate uses (including residential) should be considered if not other need is identified. Flexibility should be built into the legal agreement to ensure development rather than passing the site back to the developer. New reserve sites should be accommodated in future schemes or as part of any regeneration.

**What the industry said (e.g. landowners, developers, agents...):**

A local landowners/developer saw no need for the allocation of reserve sites close to allocated large-scale employment areas as future growth phases are built into the masterplan of such sites, often linked to infrastructure delivery.

**What local organisations/interest groups said:**

One local organisation supported the continued allocation of reserve sites, in particular larger sites. They accepted the principle of residential development or other uses on existing reserve sites if equivalent land (but in fewer, larger sites) was allocated in exchange, if the site in question has proved to be unsuitable for its original purpose. They considered that a time-limit on sites would be an incentive to a developer to impede community use developments, so they should remain as reserve sites in perpetuity, but not held by the Community Foundation.
A local society, however, resisted the idea of considering alternative uses on reserve sites - any changes should only be considered if it can be demonstrated that a site will never, or not for the foreseeable future, be needed for the proposed purpose, and such decisions should go through full consultation with the local community. Residential development should only be considered if that is what the site was originally reserved for. Reserve sites for employment and residential should be reviewed after c.20 years, but for other uses the sites should remain available as needs may take decades to be realised. They do not support allocating larger reserve sites. Finally, they suggested there is little point in allocating employment and residential reserve sites, but they would support ongoing allocation of reserve sites for social, voluntary and community uses.

**Question 3: Community Facilities**

- How can our planning policies prevent the loss of community facilities, particularly if there are concerns over the economic viability of a use?
- What sorts of facilities would you want to see provided alongside new development, to help create sustainable communities and walkable neighbourhoods?

**What Town and Parish Councils said:**

One Council raised that many older community centres have fallen into bad repair or bad management, with decline due to a shift in demand with changing times. Most rely on semi-commercial hirings, but to survive they need to be divorced from narrow groups and managed as an asset to generate self-sufficiency to support low-funded groups. Another believed that policies should include a requirement for proper investigation of non-viable facilities and that a business case should be needed for closure, which takes account of the cost of loss of quality of life and social cohesion. Another believed that community facilities should be offered to Parish Councils with an endowment (§106) to ensure they are viable.

New developments should include a mix of facilities to suit mixed communities, with centres incorporating sport and leisure, with refreshment halls and room hire facilities, managed by specific charitable organisations. Affordable parking, more efficient road networks and increased number of GP and medical practices were identified as important for new developments. Another stated that provision for new development needs to take account of existing facilities to make sure they are not over-burdened by additional usage.

One Council said they believe possible solutions for the pressure on burial grounds are being addressed nationally.

**What Ward Councillors said:**

Two Councillors believed that community facilities should be designed and built with the community and organisations who can make them work.

**What Milton Keynes Council departments said:**
One team believed that if existing community facilities are not economically viable, all efforts must be made to renovate and improve the services they provide to maximise their use. They felt that communities should be largely self-contained to promote cohesion, self-reliance and a sense of community.

Another team referred to the Sports and Active Communities Strategy 2014-2023 which proposes space and accessibility standards for new build, and for facilities to be ‘local’ forming a network of facilities that people can walk to, to encourage volunteering, community and sporting activities and ensuring cohesion.

What the industry said (e.g. landowners, developers, agents...):

One landowner/developer considered that their proposed development incorporates community facilities that will meet day-to-day needs of workers on the site, and that a similar approach should be adopted for any other large scale employment allocations.

What national/statutory organisations said:

The Theatres Trust proposed a policy approach for safeguarding existing facilities, which includes replacement facilities, funding for enhancing existing facilities and provision in accessible locations. They warned that community uses are inherently unviable in developer terms, however they are essential for the social health and well-being of the local community and therefore must be safeguarded and enhanced.

What local organisations/interest groups said:

A local society wanted to see the Community Right to Bid extended to one year so that privately owned community facilities built on land reserved for community use can not be used as a back door for getting the designation changed. They also felt that the viability of publicly owned community facilities should not be an issue as they must be maintained for the future, whether by the community or local council. They felt that new development needs to provide sports/recreation land and a multi-purpose community hall, and that sites for health centres, schools, local retail, public transport and open green spaces should be considered on a strategic level, taking account of what is already nearby.

Another organisation wished to see clawback arrangements (on reserve sites) in place in perpetuity.

**Question 4: Education**

- What can Plan:MK do to make provision for education within the Borough, including ensuring we have planning policies which ensure we have sites for new schools and help to support the continued development of the universities?

What members of the public said:

One respondent suggested that education should form part of a coherent masterplan for the Borough.

What Town and Parish Councils said:
It was said that Plan:MK should ensure that sufficient education provision is made in all future planning applications, with continuous review of forecasting since the city is dynamic. Design was raised, with Councils believing that we should concentrate more on the quality of design as school environments need to be more supportive, and that new schools should be adaptive. It was felt that schools should be at the hub of the community and grow to become 24 hour operations that support local communities.

With regard universities, one Council said they felt we had ‘missed the boat’, but that the Council would do better to engage more with businesses and commerce in pursuing joint ventures on trade and skills apprenticeships. Another believed we should make provision for a ‘full’ university and campus.

What Ward Councillors said:

Two Councillors believed that schools should be built with the community in phases, and we should recognise that demand for school places goes in cycles. Several Councillors referred to universities; that Plan:MK should reflect the University of Bedfordshire’s vision and intention for the life of the plan and that sites should be identified to expand the university.

What Milton Keynes Council departments said:

One team stated that schools are categorised as critical infrastructure in the Local Investment Plan. They believe we should allocate sites that are adaptable to changes in demographics and for a variety of uses, and that reserve sites next to schools may provide for some flexibility. They believe that in some cases there could be scope for a reduction in the size of a school, but school fields should generally be protected.

Another team, who is responsible for school organisation and ensuring there is a supply of education and childcare provision, discussed how the demand for places has increased significantly in recent years due to demographic increases, new housing development, and changes in national legislation. Their current projections indicate that in addition to the expansions already secured, additional primary places will have to be secured to ensure all children starting school for the first time can access one from September 2018, and additional secondary school places secured to enable children starting secondary school in September 2015. Additional housing above what is already planned will therefore generally require additional education and childcare places to be secured. Changes in national policy mean we are no longer able to directly control the supply of education and childcare places, and must instead negotiate with and influence organisations to ensure we can achieve our duties. Further, our ability to expand existing schools will become increasingly restricted by the capacity of the site. The team would therefore support a strategy where the majority of new housing is planned in areas where large housing development can be clustered and where there can be capacity to secure and build a brand new school site to serve the new community.

What neighbouring and other local authorities said:

Northampton Borough Council believed there is a need to work closely with Northampton University as well as the education facilities at Silverstone.

What the industry said (e.g. landowners, developers, agents...):
A local agent felt that education funding should be secured via the Community Infrastructure Levy, and land required for schools can be negotiated on a case-by-case basis, secured through S106 agreements with appropriate clawback mechanisms.

A landowner/developer emphasised that not all education is related to universities, and support should be given to development proposals that lead to opportunities for apprenticeships, and physical and virtual links to Higher Education or vocational training.

The University Campus Milton Keynes discussed how the early years of the campus (opened in 2013 at Saxon Court) is scheduled to grow to c.500 students by 2017/18. They state that the significant restriction to attracting students is the lack of suitable residential accommodation. The possible conversion of vacant offices to student residences within the locality of Saxon Court is preferred to build the campus community that incoming students desire. For the longer term, their ideal scenario for a university campus is one which has the academic and support buildings located on the same or adjacent sites as purpose built halls of residence to an optimum ‘campus’ environment. They believe a town centre location is ideal with its close proximity to transport hubs, and previous suggested locations at B4 and Campbell Park would meet these requirements.

What local organisations/interest groups said:

A local society felt that we should identify reserve sites for schools, which like other reserve sites, should not have their designation removed. Another organisation would like to see schools used more by the community, suggesting that some new churches could operate from school.

Question 5: Infrastructure

- What policies are needed in Plan:MK to deliver the infrastructure we need to support growth?
- What do you think are the most important elements of infrastructure to fund?
- Are there any different or innovative approaches we could consider to help fund infrastructure and service provision?

What members of the public said:

- Believe that new developments are going ahead without infrastructure, and existing infrastructure which is already at capacity is expected to cope. Also, there is no explanation of how infrastructure will be in place ahead of housing.
- Funding generated through Section 106/Tariff needs to support areas directly affected by new housing.
- Growth proposed for Olney will necessitate the complete rethinking of the infrastructure of the area, namely the Olney and Lavendon bypass.
- Future growth needs better access from the western fridges, including a much-needed upgrading of the A421 west of MK.
- Concerned that there is never any mention of where the water for all the homes that are planned will come from.
- Importance of sewage treatment as Pineham regularly malfunctions, and needs improvement for a larger population.
What Town and Parish Councils said:

It was stated that the success of Plan:MK will depend on the infrastructure contained and built alongside development.

Several Councils believed that we need to be flexible and think outside the traditional, and suggested investigating 'Smart City' technological aids to health care and sustainable communities.

In terms of funding, it was considered that we should leverage the provision of development opportunities to provide or fund required infrastructure and services. One Council felt that MKC has been too quick to accept weak arguments from developers about viability, and that once an agreement is made with a developer, we need to manage it.

Priorities and the most important aspects of infrastructure were felt to be ICT, transport/highways, hospitals and medical centres, and education, and that policies are needed to deal with traffic congestion; innovative and affordable parking facilities for CMK and local centres; social infrastructure; rail connections to London; and improved technological links. They also consider that development should be focused along the East-West rail corridor.

One Council wished to see the classic CMK infrastructure retained as the basis of development in CMK, but believe maintenance and management of the urban estate should be undertaken by a body similar to the Parks Trust, with an endowment and investment from developer contributions to supplement the current highways, car parking and landscape management budgets.

What Ward Councillors said:

One group of Councillors are extremely concerned about the trend to develop significant numbers of homes with no thought for where the infrastructure can be provided, and consider that the current reluctance to extend schools and the lack of provision of land for new schools is concerning. They would also oppose any significant reduction in our current S106 policy and should seek legal ways of implementing the policy in practice once the CIL regulations are in place.

Two Councillors highlighted that health concerns are a real concern for MK now and in the future, and are key to the whole growth issue.

What Milton Keynes Council departments said:

One team identified a strong link between Plan:MK and the Local Investment Plan, and that infrastructure identified in the plan must be realistic, affordable and deliverable, and perhaps categorised as critical, necessary or desirable. They suggested that policies are needed that set a framework for working with Government, investors and developers to deliver affordable schemes. They recognised the success of the MK Tariff in securing contributions and the possibility of a new Tariff for further expansion areas.

Another team however raised concerns that with limited funding and developer contributions, it is often affordable housing that is waived to make development viable and deliverable. So they would encourage Plan:MK to decide priorities and put them in order within the document.
The Waste team submitted comments which identified the need for a new or supplementary community recycling site to serve the west, central and southern areas of the city.

What neighbouring and other local authorities said:

Northampton Borough Council welcomed the central principle of ‘infrastructure before expansion’

Buckinghamshire County Council recognised the need to work together to ensure sufficient provision is made for services and infrastructure to accommodate demand from potential developments near the MK/Buckinghamshire boundary, and they encourage full and early engagement.

What the industry said (e.g. landowners, developers, agents...):

A local agent believed that necessary local infrastructure should be secured on a site-by-site basis via S106 agreements, with strategic infrastructure funding secured via CIL contributions.

A landowner/developer said that certainty is needed and therefore they wish to see policies that support and enable required infrastructure, and protect or safeguard the land required to deliver that infrastructure. They noted the benefit of forward funding of infrastructure through the history of MK. Another landowner promoted their site which would deliver residential development alongside infrastructure.

What national/statutory organisations said:

SGN explained that alterations to existing gas infrastructure assets that are needed to allow development to proceed would have to be funded by a developer and could cause significant time constraints, so the need for early notification is highlighted. Similarly, they would want early notification of any proposals considering renewable technologies, particularly in relation to the production of biomethane.

Renewable MK supports the approach of understanding future capacity of the existing utility networks, but say it is prudent that all currently available grid capacity should be fully utilised, with carefully sited new grid connections that allow additional capacity for renewable and low carbon forms of energy production to be brought forward.

What local organisations/interest groups said:

The Parks Trust believed that Plan:MK needs to ensure mechanisms are put in place to fund the provision and maintenance of open space, which is as essential as other forms of infrastructure in achieving sustainable and liveable developments. They considered the cost of maintaining open spaces can be reduced if the network is strategically planned, well designed and incorporates income-generating assets.

A local society believe joint working is needed to support growth, and that open space for leisure and recreation, public transport, and education are the most important elements of infrastructure to fund.

Thames Valley Police feel that the provision of police infrastructure is crucial to the provision and creation of well planned, sustainable development and a specific reference to police infrastructure should be included in Plan:MK, not as part of a generic ‘Emergency Services’ category.
The Milton Keynes Clinical Commissioning Group submitted an Estates Statement that outlined their commissioning approach for healthcare premises, to help explain the strategic development of primary care in Milton Keynes.
8 Quality of Place

Summary

This Topic Paper covered issues including what makes Milton Keynes special; the potential to require development to meet stated architectural, design and space standards; housing density; the use of design codes; how self- and custom-build could be promoted in the Borough; conservation and heritage issues; and the potential to develop a Local Design Panel. 148 individual comments were received from 46 individuals and organisations.

Responses to the paper were generally positive, particularly with regard developing a Local Heritage List; promoting opportunities for self- and custom-build; encouraging the use of Design Codes; developing minimum space standards; and setting up a Local Design Panel. Many respondents supported the use of the original principles and design characteristics from the Plan for Milton Keynes and identified many of the unique, innovative and enduring features that contribute to quality of place.

Question 1: What Makes Milton Keynes special?

- Do you think we should continue to try and maintain the original principles and design characteristics in new development?
- Which characteristics work and which don’t?
- Which are essential to maintain in the future?

What members of the public said:

There was overwhelming support the idea of continuing the original principles.

Strengths of Milton Keynes or principles that should be continued were identified as including the following:

- Support retention of the grid road landscaping
- Careful integration of existing settlements as per the original masterplan should continue - preserve characteristics
- Support keeping the grid roads; some felt that the departures from the grid system at the Eastern and Western Expansion Areas had already caused problems.
- Support maintaining a segregation of living, working and commercial areas
- Amount of open space and play facilities within housing areas and CMK
- Consistent building lines and covered walkways in CMK
- Grid layout of the older (doughnut) estates.
- Protect the concept of low rise development, grid roads and linear parks
- Support for having an iconic ‘statement’ feature to put MK on the map, as a tourist attraction/destination.
- Praise for the Stadium as a venue and destination
- Need to retain character of existing settlements
- Should take a lead as a Smart City, continuing to encourage innovation and attracting new ideas as a test-bed for concepts (e.g. driverless cars, Project FALCON - ‘Flexible Approaches for Low Carbon Optimised Networks’)
- Capitalise on the Bedford-MK waterway
Weaknesses included:

- Poor connections between some areas (e.g. Campbell Park and CMK), but there are some good examples.
- Some recent developments are characterless and have other failings (e.g. too high density, roads too narrow, insufficient parking).
- Redways; pedestrians and cyclists need to take a more direct route to their destination and need the surveillance of more active areas, and because it is not ideal for fast moving cyclists to share a route with pedestrians, children and dogs.
- Lack of a bus station and associated facilities in CMK.
- Existing residents are not protected from new development.

What Town and Parish Councils said:

All of the Councils that responded supported maintaining the original principles and design characteristics. In particular, they considered that what works and what should be continued includes:

- quality of space
- the grid system
- the linear parks, which should be extended as MK expands
- redways, which should be expanded and improved, and run alongside grid roads for safety
- the relationship between development and open space
- accommodating areas of interest in a thoughtful way
- the treatment of original villages with a conservation status within new developments
- the adoption of Design Code principles
- the distinction between different areas, including old and new
- access to allotments and growing spaces
- the drainage/lakes system which should be expanded as climate change continues
- the role of older towns and villages in contributing to the uniqueness of MK.

There were some areas for improvement identified, including:

- concern that the (city) street scene in Broughton (Gate) doesn’t work and should have been a grid road
- the treatment of villages that do not have a conservation status, which has had a detrimental effect on areas on their unique characteristics
- the poor design and juxtaposition of some houses and footpath links which lack a sense of place
- the increasingly small houses and gardens, being built without accessible community space
- the need for more innovation for needs-based flexible housing for elderly and young persons.

One Council wished to see the inclusion of underground car parking.

It was recognised there have been problems with new estates, and that future development areas should have their own unique style and characteristics, with green spaces and a mix of tenures and building types.
Some respondents believed that more innovation is needed so we don’t preclude new ideas that go beyond conformity with those principles. They felt there is an opportunity to learn from developments in other countries.

**What Ward Councillors said:**

One Councillor recognised the benefits and wished to see the retention of the street hierarchy, including cul-de-sacs; the green street scene; protection of historic villages, dispersal of uses; identifiable districts/estates; the redway and grid road networks; local centres; and grade-separated crossings. However, he felt we should rethink the provision of local play including 'accidental' visitor attractions and the facilities provided alongside them; and the distribution of open spaces, so that they are located closest to those with the smallest or no gardens.

Two other Councillors wanted to keep MK distinctive.

**What Milton Keynes Council departments said:**

One team saw the benefit of having easy local access to community and sporting facilities, but that this would need to be balanced with the need for larger facilities for a wider audience.

Another stated that the ethos of architecture and design, innovation and excellence, quality of life and world class design should be re-invigorated, with innovation and being leading edge as key principles rather than physical characteristics. The proposed Design Audit is needed to understand the principles and design characteristics and their relevance for the modern city. They suggest that thought needs to be given to how high density can be achieved with a modern transport system that addresses pressures of growth within a grid square layout, but doesn’t repeat the problems experienced on some of the more recent developments.

**What neighbouring and other local authorities said:**

Northampton Borough Council said there was a need to understand what MK is trying to 'be' and the community's requirements, and that quality of place should follow from there.

**What the industry said (e.g. landowners, developers, agents...):**

One landowner/developer believed that the majority of the strengths of MK come from maintaining the past principles in new development and they should be continued in Plan:MK. They also thought that the plan period is too short to suitably develop strengths, and should look over a longer period.

A local landowner in the city centre believed that the grid system in CMK should be maintained in principle, but balanced with the need to satisfy modern commercial requirements. They believed that policies should be introduced to allow building lines to move forward and replace existing surface level car parking which could otherwise be provided in multi-story car parks, which would support the development of comprehensive mixed use schemes within the core of the city.

**What national/statutory organisations said:**
English Heritage support maintaining the original principles and design characteristics without stifling innovation. They also commented that no mention is made of the boulevards and tree planting as important characteristics of the original New Town, and that the context in the paper should have made reference to the Registered Historic Parks and Gardens and the difference between designated and non-designated heritage assets.

**What local organisations/interest groups said:**

Most local organisations that responded stated their support for the continued use of the original principles.

It was felt that they have been embedded in the built form and do more than give character – they’ve been fundamental to delivering growth. One local organisation wished to see the uniqueness and integrity of the original design retained, so that ordinariness didn’t spoil it, and another supported the flexibility, resilience and attractive environment the original principles provide.

There was agreement that some recent developments are poor in comparison to much of the earlier New Town development and that Plan:MK needs to deliver higher standards.

They assert that the city streets have not worked as intended, and challenge the claim that people living alongside city streets means greater activity during the day. It was thought the Topic Papers should reflect that grid roads should be part of a network of routes (including redways) and not only used by cars. Grid roads should also be considered as an asset, that gives us resilience and future-proofing, and shouldn’t just be seen as a problem. They wished to see the maintenance and extension of the grid roads, and existing roads widened where space allows.

It was said that the redway system should be marked out for cycle and pedestrian use, and pathfinding help given to newcomers to the city for the grid layout and redways.

It was suggested that the document should reflect the great importance of the infrastructure of the city, including ‘soft’ and ‘hard’ infrastructure of landscaping, spacious boulevards etc developed as part of the New Town. The Parks Trust recognised the value of green space in defining character and quality.

One local organisation also discussed the uniqueness of the Milton Keynes ‘zeitgeist’, and the social and economic benefit of an engaged and interested community and the wealth of cultural organisations in the city. They supported the consideration of MK for world heritage status, and asserted that arts and heritage should be seen as an investment, not a cost.

A local faith organisation raised their concern that there were not sites available that are large enough for faith communities and their parking requirements.
Question 2: Architecture and Design Standards

- How can Plan:MK ensure new development proposals meet high standards of design quality?
- Should meeting best practice standards be mandatory through planning policies?
- How should the policies promote or reinforce local distinctiveness?
- Given the patchwork character across the city in terms of housing design, should new developments seek to build on this legacy so as to create places with interesting and varied architecture that helps to create a strong sense of place or identity?
- Should meeting the principles of flexible and extendable homes be a requirement for a proportion of homes on all major housing schemes?

What members of the public said:

- Mandatory standards might be too limiting
- Flexible and extendable homes should be trialled on a small scale
- Keep a preference for good building design.

One member of the public suggested that an urban extension to the south of MK should be built along the principles of Poundbury, giving priority to people rather than cars and mixing commercial with residential uses etc to create walkable neighbourhoods, and that such a development should take advantage of access to East-West Rail and capture opportunities of the knowledge economy.

There was concern that MKC appear to have no intention of delivering a proportion of wheelchair accessible homes as part of all developments. It was considered that they need to be built alongside regular housing, not segregated. Article 19 of the Convention on the Rights of Persons with Disabilities gives people “the right to choose where they live”, but the current housing stock has very few affordable options that have potential to be adapted for the needs of a wheelchair user.

What Town and Parish Councils said:

One Council wanted all developments to provide reasonable living space, with a garage and parking space, and that green and community space needs to be provided on all developments. The maintenance of landscaping needs to be taken into account, and that there should be some consideration of the development of vertical villages.

Another believed the success of the MKDC developments and exemplar city and design and infrastructure is down to the involvement of properly qualified professionals, and that this should be the case for every application for more than five dwellings or any non-residential scheme, with qualified professionals working independently for the applicant. They also stated that best practice standards should be mandatory, and that we need to promote/reinforce local distinctiveness by refusing ‘design book’ solutions. They said that more important than flexible, extendable homes is to ensure the correct mix and standards of design are adhered to at the outset.
Another Council stated that some examples of poor design recently are losing the sense of uniqueness that MK has, and that ‘uniqueness’ needs to apply at various levels (e.g. development-wide, a street, an individual house). They felt that standards should be mandatory, although noted that policies tend to set a low minimum threshold. They wished to see involvement from the community and Parish Councils in order to help promote local distinctiveness. They noted that sense of place is important, and should be guided by the heritage, landscape etc. in the local context, but that care needed to be taken to avoid a jarring juxtaposition or doing something “just to be different”. They would support a high proportion of flexible and extendable homes, but need to make sure that the potential future changes are considered up front (e.g. parking, noise, proximity problems).

One Council felt that Homes for Life, flexible and extendable homes, and space standards should be mandatory as part of every new build. They also suggested that older town centres should be revisited for future proofing and maintenance to reinforce local distinctiveness. It was recommended that a review of housing types and layouts should be undertaken to consider which work and which don’t, and the maintenance requirements.

It was also raised that strong policies upheld through decisions on planning applications are needed to ensure proposals meet high standards of design quality.

What Milton Keynes Council departments said:

One team believed that development (especially on greenfield sites) should exploit and build on the existing patchwork character, innovation and bespoke designs of some earlier housing areas. They recognise the impact of architectural style and appearance of buildings on achieving a sense of place, identity and local distinctiveness.

Another department supported the idea of a ‘characterisation’ panel and Design Audit to assess what is unique about the built heritage of MK, and also to look at future developments and how they relate to the character of an area, and to help inform the character of new developments. They also supported mandatory standards, and believe MK should lead on adopting the highest standards possible. They felt that Neighbourhood Plans should be encouraged to explore the heritage and history of their area. The team said that local distinctiveness could be promoted through developing exemplary arts venues, public art and arts programmes, and that we should look at case studies where exemplary architecture and design for cultural venues has impacted on the profile and economic development of that area. They believed that a lead artist should be involved at the masterplanning stage to help inform design briefs and the principles for the whole development.

One Council team felt that all new development should meet the standards set out in the Housing Strategy, to deliver high standards of design quality, and that this should be mandatory to make sure they are adhered to. Similarly, the concept of requiring a proportion of homes on all major schemes to meet the principles of flexible and extendable homes was supported. They suggest that there could be a role for Neighbourhood Plans to help deliver local distinctiveness, and they support continuing the patchwork character that helps to create a strong sense of place or identity.

What the industry said (e.g. landowners, developers, agents...):
A landowner in CMK supported the idea of architecture and design standards policies but that they mustn’t stifle innovation or initiative through strict requirements. They also stated that local distinctiveness should be based on height, massing and scale, with flexibility to allow the original design ethos to continue.

**What national/statutory organisations said:**

English Heritage said that new development within existing areas should reflect local distinctiveness. Development on greenfield sites should maintain variety of design within a grid square pattern, but should avoid too much variety within a square (in keeping with the existing patchwork character).

**What local organisations/interest groups said:**

A local society felt that best practice standards should be mandatory, or developers won’t deliver them. They also supported the requirement for a proportion of homes to meet flexible and extendable homes standards.

Another local group believed that firm and demanding development briefs are needed to help deliver coherent design and distinctive character which helps people identify with their neighbourhoods. They supported mandatory standards, but that they need to have room for common sense and imagination. Developers need to take time to understand context and opportunities, and the group supported a regularly updated Local Heritage List and the use of policies that refer to it, which require a suitable palette of materials and require genuine and timely consultation on proposed schemes. They recognised that a patchwork of character can be good, but it needs to be thoughtful and build on a legacy of masterplanning. They also stated that flexibility should be built into schemes, but sometimes good architecture can be undermined by bad extensions later down the line.

The Parks Trust said that the design and layout of open space around a built development can be as important in defining local character and creating attractive places as the building themselves. They believe that Campbell Park and some other special places in the open space network should receive particular attention in conserving the quality of the setting of these areas.

A local citizens organisation said that quality of places needs to refer to people feeling ‘safe and secure’ and environments where people can gather in attractive, safe and secure environments.

**Question 3: Housing Density**

- Do you think it is right to continue the approach of having a mixture of housing densities on major development sites, which varies with the character and surroundings of the site?
- Do you think the approach of promoting lower densities in the rural villages should continue?
- Are there locations that we should specifically encourage or support higher density development?
- Should we continue with density zones as in the Local Plan, or should the density of windfall developments be considered on the basis of being sensitive to the surround area, without providing indicative figures in a policy?
What members of the public said:

Many respondents supported lower densities in rural areas, to be sensitive to their character, but otherwise a mixture of densities, varied with character of the different areas was supported.

Many also felt that the density of windfall should be determined on a case-by-case basis, being sensitive to surrounding areas, rather than using zones.

Keeping the general level of low density housing across the city was also supported as it is a feature of MK, with high density areas limited to main centres.

Several comments discussed that a proportion of open space is probably more important than the overall densities, as even low density schemes might miss the shared space and parkland that are defining characteristics of the city.

Some felt that some recent higher density schemes have ‘imperilled’ one of the features that makes MK successful.

One respondent opposed the policy of putting lower density housing closest to parks and open space as it equates to richer people benefitting from publicly owned and maintained open space. There is a similar principle in rural areas where resisting higher density, smaller homes discriminates against groups who wish to live in such locations but are unable to afford the larger homes being built. This also applies to higher density sheltered/communal housing for the ageing population.

One respondent said they had a lack of faith that decisions are being made in accordance with policies, citing an example of a development approved with a density significantly greater than the Local Plan, and that this means people do not see the benefit in getting involved with future plans.

What Town and Parish Councils said:

One urban Council wanted to see an increase in densities of development, so that buildings become ‘higher rather than fatter’. Concentrating employment land in fewer centres (including CMK) will help deliver the reduction of single occupant car journeys if supported by appropriate public transport (e.g. CMK shuttle bus).

Another believed that inner city infill and brownfield/industrial sites may be appropriate for higher density residential development, and they supported case-by-case consideration of density on infill developments. This was supported by another Council who agreed that densities should be determined on a case-by-case basis as a ‘one size fits all’ approach is not feasible as the Borough matures.

A rural Council expressed concern about the impact of high density living on infrastructure, services and facilities, and would support lower densities in rural villages. Another felt that the existing density of rural villages and open spaces should be respected to maintain their value and appearance.

One Council felt that lower densities should also be promoted in villages in the urban area and those that do not have conservation status. All infill densities should accord with existing density or patterns of development. They also felt that obvious locations for higher density development are in the inner city and areas with good existing facilities.
that can be expanded. Care needs to be taken to encourage a sense of community, especially where there may be greater occupant mobility. Small, higher density schemes may be appropriate in some locations for elderly and single people.

**What Ward Councillors said:**

One Councillor suggested we should rethink densities as far as possible within national policy requirements. We should move towards ‘people per hectare’ rather than ‘dwellings per hectare’ as a measurement, to better reflect the number of people living near to public transport corridors etc. Appearance and density of infill sites should be up to the level of the surrounding area.

Another encouraged higher density development, especially where there is significant overcrowding in low density areas in CMK ward.

**What Milton Keynes Council departments said:**

One Council team felt that density zones, like in the existing Local Plan, would not be appropriate because regeneration in some estates might require areas of higher density development than stated in a policy for them to be viable, and because the way that phased development of some large sites is managed may result in significant divergence from the stated densities in the policy.

Another said that density zones help to identify broad development parameters, and that different densities help to create a sense of place.

This was also the case for another team, who supported a continuation of the approach of a mixture of densities that varies with the character and surroundings of the site. They supported lower densities in rural areas, but that it should be for Neighbourhood Plans to set this out in areas where one is being prepared. High density is encouraged in CMK and existing settlements, but balanced with a need to provide car parking etc. They supported the use of density zones to help give an indication of what is acceptable, but windfall needs to take account of the surrounding area.

**What the industry said (e.g. landowners, developers, agents...):**

One group of housebuilders believed that density is an issue that needs to be dealt with on a case-by-case basis looking at the proximity to facilities etc, and responding to local site conditions.

**What national/statutory organisations said:**

English Heritage supported lower densities in villages, to be sensitive to their character. The density of proposed development should always be sensitive to local conditions rather than generic or arbitrary figures.

**What local organisations/interest groups said:**

A local society supported the continuing approach of a mixture of densities on major sites, and density zones for guiding windfall proposals. They also support promoting lower densities in rural areas.
Another local organisation believed that densities should continue to be relatively low as it is a unique selling point for MK and contributes to the character, with its generous public realm and open spaces. Low density is supported in villages but not if they become unsustainable due to poor connections, closing of facilities etc. They noted that high density schemes can be attractive, delivering high standards of sustainability and appearance, but that it mustn’t be at the expense of public realm. Opportunistic windfall development must be sensitive to the surrounding area in terms of density, with indicative figures given rather than leaving it to ‘market forces’. They also felt that the current perceived demand for smaller properties shouldn’t result in inflexible policies that don’t account for natural fluctuations - policies should take a longer view and be strategic.

The Parks Trust stated that the trend towards smaller private gardens emphasises the need for good open space provision close to home.

Question 4: Design Codes

- Do you think the approach of using Design Codes has been successful?
- How do you think they could be improved?
- Should they be more ambitious in terms of sustainability, establishing character or delivering high quality public realm?
- Should Design Codes be required through policy for use on development schemes of a certain size?

What members of the public said:

- Design codes and enforcing consistency of materials can stifle creativity
- Support for setting sustainability standards
- Should be no prescriptive rules beyond existing planning and building regulations
- In favour of design codes in principle as they deliver coherent development and should be required for schemes above a certain size.

What Town and Parish Councils said:

One Council suggested that design codes should ensure that space for community activity and interaction are included, and the timing for the delivery of community buildings should be based on context and location. Innovative ideas from other countries should be considered, and some aspects of design codes should be used on single dwellings and small infill developments.

Another suggested that thought needs to be given to how design codes are developed in conjunction with Neighbourhood Development Orders, which give Neighbourhood Areas the right to determine their own planning permission.

What Ward Councillors said:

Two Councillors specifically stated their support for the use of Design Codes. Another believes MKC should retain its longstanding aspiration that housing should be exemplary and at least exceeding national minimum standards [for sustainable construction].
should also find more effective ways to deliver this beyond a fine/compensation payment, and look more robustly at sustainable energy sources, which may not be as sustainable as they appear.

**What Milton Keynes Council departments said:**

There was support for design codes and development briefs, as a framework for development that meets stakeholder requirements. But it was considered that how they are applied is key to keeping quality levels high. One team stated they also need to take more account of local context and should push the boundaries and result in leading edge developments. They felt that design codes should also consider how a proposal relates to the wider scheme if it is just one part of it.

**What the industry said (e.g. landowners, developers, agents...):**

A local landowner/developer considered that design codes can be used successfully on larger schemes with extended build-out periods.

**What national/statutory organisations said:**

English Heritage said that design codes can be helpful but small developments in historic areas need more detail consideration rather than broad brush parameters.

The Canal and River Trust discussed the role of inland waterways in place-making and place-shaping, and development adjacent to a waterway should ensure that the waterspace is recognised as an integral part of the development, not a barrier, edge or backdrop. They also noted however that waterside developments also place extra liabilities and burdens upon the waterway infrastructure with maintenance consequences. The Trust welcomed policies that encourage early engagement at design code or pre-application stages.

**What local organisations/interest groups said:**

A local society believed design codes should be a requirement on schemes of a certain size and should be more ambitious in their requirements. Another organisation said that even where design codes exist, some applications and decisions go against them which undermines their use. We should also be more ambitious in establishing and reinforcing existing character and delivering high quality public realm.

The Parks Trust felt that open space layout and design needs to be included in all design codes, related back to a wider green infrastructure strategy.

**Question 5: Space Standards**

- Do you think requiring new homes to meet a minimum space standard would be beneficial?

- Or should Plan:MK include advisory space standards, which set out the room/dwelling sizes we would expect, but that would not be compulsory?

**What members of the public said:**
The respondents to this question were in favour of minimum space standards, but one suggested that they should be advisory, and noted that clever planning might make a smaller house more usable than a larger, less well-planned dwelling.

**What Town and Parish Councils said:**

Two Councils supported mandatory minimum space standards that include, for example, storage space. They note that the design of a space is equally important too, not just the size of it.

Another Council suggested that homes that do not meet basic expectations are likely to prove unpopular, won’t be well-cared for and those homes and areas over time become undesirable. Space standards should therefore be compulsory.

**What Ward Councillors said:**

One Councillor said that we need to reverse the pattern of ever-smaller homes, and should encourage social housing properties to meet minimum standards. Property space should also be stated prominently on planning applications.

**What local organisations/interest groups said:**

A local society believed that minimum space standard requirements are needed to prevent room sizes continuing to shrink and to ensure new residents have sufficient space to live a reasonable quality of life. Another organisation supported the use of Parker Morris standards and that advisory standards are insufficient as they will not be adhered to.

**Question 6: Self-build and Custom-build**

- Do you think the Council should find ways to support self- and custom-build housing?
- Should we allocate sites where we would expect development to take the form of self-build?
- Should we explore the potential to use a Community Land Trust to help enable group/community self-build?
- Should we require that a percentage of plots on large new housing developments are reserved for self- and custom-build homes?

**What members of the public said:**

There was significant support for encouraging self-build, as both community and individual self-build

- Encourage group and community self-build but don’t think a percentage should be imposed.
- MKDC had a history of providing self-building opportunities and it should be supported again using methods outlined in the paper.
- Promoting self-building would increase housing supply and help to get people onto the housing ladder by building a home they would otherwise not be able to afford.
- Resilience of promoting self-build so it isn’t just volume builders delivering expansion. Self-builders are often prepared to try out new technologies and sustainability
innovations. It was also suggested that more self-build and small scale developments could be delivered and managed by housing associations.

**What Town and Parish Councils said:**

One supported ways of delivering self- and custom-build as there is clearly latent demand and it gives the opportunity to try out new ideas. Another highlighted that self-build schemes have created some of the most distinctive and cohesive communities, and gives the opportunity for people to innovate or to economise. They recognised the Government’s agenda to assist group/community self-build. They said that MK hasn’t established the level of demand for self-build in the Borough, but it is potentially large. Plan:MK needs to support the Government’s plans to double the number of self- and custom-build homes.

Another Council said that land values of plots would need to be competitive so that buyers can gain mortgages for the build, and that plots should be available across the Borough.

**What Ward Councillors said:**

One Councillor said that self- and custom-build should be encouraged along with experimental building mechanisms and innovative features. He supported a few plots on every major estate and also a few modest sites devoted to self-build schemes, which would also provide reputational benefits.

**What Milton Keynes Council departments said:**

One team agreed that self-build housing offers an alternative way for people to obtain the house they want, not just what a volume housebuilder delivers. MK’s history of providing plots should continue and support the possible options set out in the paper for how that could be delivered.

MKDP said they would seek to allocate a percentage of plots for self-build where practical.

**What the industry said (e.g. landowners, developers, agents...):**

A landowner/developer said that requiring self-build plots on all major sites is not supported as it doesn’t address the varying circumstances (e.g. abnormal development costs on brownfield sites).

**What local organisations/interest groups said:**

A local society believe that self- and custom-building is more sustainable long term and small sites could be allocated in rural locations, which would help with the lack of affordability. Community Land Trusts should be explored, but it is not deliverable to require a percentage of plots on large sites to be reserved for self- or custom-build. Another local organisation also support the delivery mechanisms identified, with the caveat that plots on a wider development need general design parameters which still allow creativity and variety, but not at the expense of overall harmony.

**Question 7: Conservation and the Historic Environment**

- Are there any heritage issues that you feel are not addressed above?
What members of the public said:

- Development near to Listed Buildings doesn’t necessarily need to be related in style – they are ‘of their time’ so should be complemented by something of our time, albeit sympathetic to the area.
- New Town architecture is only just beginning to be appreciated, and some of it is under threat and so should be on the ‘at risk’ register. Urgent need for MKC to lead the identification and protection of ‘recent’ heritage assets and their settings.
- Magiovinium needs a positive policy to enhance and conserve the site, which is at risk and may end up being bound by development on all sides.
- There is heritage value in the layout of CMK and the surrounding estates which are much valued and they should be explicitly protected.

What Town and Parish Councils said:

As mentioned in other comments, one Council stated they would support a percentage for Heritage, Museums and Archives policy, by reducing the percent for art budget, and would support further work on living history and scheduled ancient monuments.

What Milton Keynes Council departments said:

One team believe that the plan should consider how to promote the historic assets of MK, including natural heritage and New Town planting that has contributed to the feel and character of the place, and that policies should require developers to make positive changes to heritage on a site, or if it is to be lost or changed, that it is fully documented for future generations.

What the industry said (e.g. landowners, developers, agents...):

A landowner/developer believe that any policy seeking to promote or retain heritage assets should place significant weight on the benefits that proposals will deliver, particularly when considering potential impact to heritage assets.

What national/statutory organisations said:

English Heritage suggested that more reference should be made to the NPPF requirement for a clear strategy and evidence base for enhancing the built environment, which demonstrates an understanding of the significance of assets. They also made it clear that heritage at risk should form part of the strategy for the conservation and enjoyment of the historic environment. They also suggested that the introduction to the paper should have included more information about the programme of Conservation Area Reviews and reference made to the quality of modern architecture as a strength. They welcomed references to the Local Heritage List and the Design Audit that the Council intends to undertake.

What local organisations/interest groups said:

A local heritage association believed that heritage should run as a theme through all aspects of life and therefore planning policy. MK should highlight the heritage on its doorstep when promoting the area and they would like to see heritage topics debated at a workshop to inform the emerging local plan.
The Parks Trust said that consideration should also be given to the conservation of ‘living heritage’ (e.g. significant old trees or hedgerows that mark old field or estate boundaries).

**Question 8: Local Heritage List**

- Do you support the preparation of the Local Heritage List as a way of establishing the wider significance of Milton Keynes and identifying those assets that contribute to it?

**What members of the public said:**

Overwhelming support for the preparation of a Local Heritage List from all respondents. Some felt it should be prepared as a matter of urgency and noted that the significance of MK’s build environment is beginning to be appreciated. It was also stated that it was important to involve English Heritage and the 20th Century Society in the process.

**What Town and Parish Councils said:**

The Councils all supported the preparation of a Local Heritage List, and one suggested that they would like to investigate how assets in their parish could be included to help maintain its special character.

**What Ward Councillors said:**

Three Councillors supported the preparation of a Local Heritage List.

**What Milton Keynes Council departments said:**

One team also supported the preparation of a Local Heritage List as a significant step in understanding about built heritage buildings, sites and areas, and how their character can be retained and used positively.

**What national/statutory organisations said:**

English Heritage stated that they strongly support the preparation of a Local Heritage List and believe that MK would really benefit from good modern buildings being identified and recognised.

**What local organisations/interest groups said:**

Three local organisations supported the preparation of a Local Heritage List, and Parks Trust would be pleased to participate. They also felt it could include features in the parkland network.

**Question 9: Local Design Review**

- Do you support the establishment of a Local Design Review panel for Milton Keynes?
- Do you agree that it should also review heritage-related proposals
8 Quality of Place

What members of the public said:

Local Design Review was supported in principle, as it could be useful to have external professionals casting fresh light on proposals. It was also suggested that it would be useful to include consideration of heritage-related proposals.

Others supported the principle, but dependent on who the ‘built environment experts’ are; they would need considerable local knowledge and an understanding of MK. Also, they questioned why external experts are needed when the decision-makers expertise in their chosen fields should suffice. They do not consider that such a panel should consider heritage-related proposals as MKC’s own Conservation Department, MK Forum, English Heritage and the 20th Century Society have the necessary expertise.

What Town and Parish Councils said:

Two Councils supported the concept of a Local Design Panel.

What Ward Councillors said:

Two Councillors supported the use of a Local Design panel.

What Milton Keynes Council departments said:

One Council team supported the idea of a Local Design Panel to help maintain a balance between retaining existing development and building future grid squares, and to provide a strategic overview that individual developers cannot provide. They suggest it should also cover heritage proposals.

Another team suggest that setting up a design review process is a requirement of the NPPF so a panel should be set up.

What the industry said (e.g. landowners, developers, agents...):

A landowner in CMK did not support the creation of a Local Design Panel as existing mechanisms are sufficient, and added layers of critique would add to the difficulties of delivering development in CMK. They gave the same view for a panel covering heritage-related proposals.

What national/statutory organisations said:

English Heritage supported the concept in principle but a panel would need a reliable conservation presence if it is to consider heritage-related proposals or it could be actively destructive.

What local organisations/interest groups said:

Two local organisations would support a panel, and would want it to cover heritage-related proposals and include representation from landscape/open space management interests.
9 Culture, Recreation and Quality of Life

Summary

This Topic Paper covered issues including the role of arts and public art, heritage assets, and other cultural resources in enhancing quality of life and raising the profile of a place. It also considered what Plan:MK can do to encourage people to lead healthier and more active lifestyles, both through engaging in formal and informal sports and recreation, and in their normal day-to-day activities. The paper also looked at the need for community facilities and what the plan can do to encourage community cohesion. 96 responses were received from 34 individuals and organisations.

Most respondents recognised that the arts and public art have a significant role to play in giving a place identity, and improving quality of life. Suggestions around methods of funding and managing arts and facilities were made, with some reliance on developer contributions. Many respondents considered that widening the current 'percent for art' scheme so it could be used to fund wider cultural, heritage and art schemes should be supported. Many also identified cultural facilities that they considered were missing from MK’s offer, that Plan:MK might look to deliver. In terms of heritage, there was a strong message that MK needs to make more of its assets, including those dating from the New Town era.

In terms of promoting healthier and more active lifestyles, maximising the use of the redways and the parks network was a common theme in the responses, including ensuring that new developments are well-linked into the network; that legibility and activity on the redways should be encouraged by placing public art and other areas of interest within the network; and promoting faster, direct routes, to encourage commuter cyclists. It was considered that free and less expensive recreation options should be encouraged, and that any development that happens as part of the International Sporting City should also be used to encourage grassroots, local sport and leisure activities and facilities. Some landowners/developers used the leisure and recreation benefits of their schemes to promote their proposals.

The importance of community facilities was recognised, with some consideration given for how they can remain viable, including allowing some flexibility to expand and diversify where necessary and appropriate. Many respondents raised the difficulty of finding suitable buildings that can be used for large community facilities, and the need for policies that allow flexibility in uses. In terms of community cohesion, we were reminded that it isn’t just local communities that are important, and that faith, cultural or ethnic communities may be more important to individuals. However, there was acceptance that local cohesion can be supported by ensuring that communities have spaces to meet and spend time, that those communities should have the opportunity to be involved in the development and management of such facilities, and be supported through a community development programme.
Question 1: Arts and Public Art

- What is the role of arts and public art in raising the profile of a place?
- How can arts and public art contribute to quality of life, vibrancy and the built environment?
- What is missing, culturally from Milton Keynes?
- How could we develop a sustainable funding source for arts and culture?
- What will we want Plan:MK to do in relation to culture, arts and public art?

What members of the public said:

Comments from members of the public covered these following points:

- Wish to see arts hubs in Stony Stratford, Wolverton, Bletchley and Newport Pagnell, especially as such places don’t need to be centred around CMK. They consider that we need hubs with spaces available at an affordable rent, which would enhance these small towns and bring arts to the high street.
- Arts culture in MK misses acknowledgement of our diverse ethnic population, and encouragement to share their artistic and performance talent with the whole community. This needs funding and space however, including a flexible indoor space for exhibitions and related activities in CMK and consideration of how public arts funding could be used more effectively.
- Believe the plan could identify key views to visitors entering the city to help siting of public art; encourage local businesses to sponsor things that otherwise might not happen; and make better use of the Public Arts Trust to maintain existing works.
- Support the emerging dance sector
- One respondent said he considers that public art serves no purpose whatsoever, and money is spent on such projects while the ‘necessities of life’ can be neglected.
- Would like to see a large architectural feature that can be seen from the M1, to be a destination.

MK Gallery could be far more popular if they stop showing post-modernism all of the time. This respondent also gave further views on the need to; encourage the Arts within communities by reducing Council Tax demands; encourage communication with communities in planning and development strategy making; actively encourage, develop and support Community Arts Centres; ensure new housing developments incorporate the latest European initiatives on cycling safety; and community policing as a positive step towards incident prevention.

What Town and Parish Councils said:

Most Councils who responded agreed that public art can help to raise the profile of a place; create well-designed, distinctive places; encourage public engagement; increase visitor footfall and commercial activity; increase community pride; and deliver good quality urban infrastructure.

Respondents considered that funding for the arts could come from S106/developer contributions (including the use of the percent for art scheme widened to heritage, museums and archives), grants, public subscriptions, philanthropic and other one-off donations, direct taxation or tax benefit, and sponsorship deals with major MK companies.
They wanted to see the creation of an Arts and Culture Trust Fund which receives S106 contributions or contributions to from council tax or business rates, to benefit the whole community.

One Council felt that quality of life only follows from public art if it is ‘authentic’, and has had the engagement of the community. Another said that Plan:MK has a key role in facilitation and allowing communities to reclaim culture, arts and public art.

As raised elsewhere, some considered that cheap, free and ad-hoc facilities and initiatives are missing from MK. One Council questioned whether the cost of becoming ‘European Capital of Culture 2023’ is achievable or realistic in the current time of austerity.

What Ward Councillors said:

Two Councillors identified several ways in which the arts and heritage provide value, including bringing interesting variety to the built environment and how it is used, and the benefit of a sense of place and personal wellbeing for health. They believe that general visibility is missing, including informal performances and temporary installations in public places. They identified some examples of how policies could support culture and recreation including temporary use of sites and buildings and road closures for events across MK. Finally, they suggest a contributory fund which can incorporate MKC and national grants, and retaining the percent for art, could be used as funding mechanisms.

What Milton Keynes Council departments said:

Two teams that responded recognised that public art helps to set the character and develop a sense of place for communities, and underlined the role of exemplary arts venues, public art and arts programmes in providing distinctive and inspiring places, hubs of activity and visual beacons which promote place, and which help to articulate the pride, diversity and individuality of MK, inspiring communities, visitors, funders and businesses.

It was raised that the arts have been built into the fabric of MK, and the international recognition of its 20th Century collection and commissioning programme. It was considered, however, that MK needs diversity in its offer, which is made more difficult without a supply of suitable buildings likely to be used for affordable, accessible spaces for music, art, comedy or drama, and there are very few independent bars, clubs and restaurants. The responses also highlighted a comprehensive list of what is missing culturally from MK, including:

- Long term and sustainable support mechanism and funding source,
- 24/7 diverse cultural activity and programme
- A producing theatre and flexible venue
- Purpose designed and creative industry spaces
- Design Centre for architecture and urban studies
- Larger scale and high profile public art along Midsummer Boulevard
- Flexible and professional outdoor performance space
- Cultural way-finding
- Curate and fill the gaps in the public arts collection
- Further large entertainment facilities to encourage visitor numbers (e.g. a concert hall, independent live music venue, or for performance sport).
They consider the percent for art policy should be widened to collect contributions for culture and the cultural wellbeing of MK, to include arts, public art and heritage, and raised the potential for a hotel ‘bedroom tax’ to support art and culture. Policies are needed that place the cultural wellbeing of people at the centre of place, that support the provision of infrastructure and activities, and spaces and places to help people come together, to exhibit, and to engage.

What national/statutory organisations said:

The Theatres Trust believe policies are needed to seek to retain and enhance existing services and facilities and ensure that new facilities are provided where a need has been identified, with the assumption to protect and enhance existing facilities before moving onto criteria for new development.

What local organisations/interest groups said:

The Parks Trust believes that Plan:MK must recognise the parkland network as a natural location for culture, arts and public art, and the role that the network plays in the cultural life of the city.

A local organisation provided a comprehensive response which went into a lot of useful detail about the needs of the city in order to growth the quantity, quality and diversity of its cultural heritage, and achieve ‘world class’ status and cultural wellbeing, which includes:

- provision of spaces (including shared spaces like those currently used by Festive Road and others, plus central, civic spaces for cultural activity);
- an independent sector, including cinema;
- development as a cultural destination, including searchable ‘What’s On’ listing;
- development of the dance sector;
- development of the role of music as an effective intervention and community celebration;
- research into the literary ambition, working with homegrown talent;
- and development of arts centres.

The creation of an independent charitable trust was supported, and generating funding through income-generating assets and S106 gains. One local society supported the idea mentioned elsewhere that the percent for art funding should be used more widely and for other purposes, e.g. open space recreation.

Milton Keynes Gallery recognise the opportunities around cultural infrastructure developments such as that of MK Gallery Expansion, and support any related public realm improvements to ensure the best possible outcome, environmentally, economically and socially. They also believe that the Gallery Expansion will better deliver against the Council’s Corporate Plan priorities.
Question 2: Heritage, Museums and Archives

- With the challenges presented within the new Heritage, Museums and Archives Strategy and how solving those challenges will enhance quality of place and/or life, how could Plan:MK assist in solving those challenges?
- What could Plan:MK do to promote Milton Keynes as internationally and culturally significant?

What members of the public said:

One respondent stated that MK needs a Record Office to allow easy public access to archives, and a museum in Central Milton Keynes.

What Town and Parish Councils said:

It was recognised that a thriving economy and income from visitors is key to funding, and that a new city with a ‘new view’ of heritage would be innovative and have potential to attract outside visitors. One Council suggested that an Art and Culture Portal for residents and visitors should be launched, containing up-to-date information about MK arts and cultural offerings. Another wished to see further work on living history and scheduled ancient monuments.

The support for expanding the percent for art scheme to cover heritage, museums and archives was repeated.

However, one Council did state that there is already an established wealth of cultural facilities in MK, and that funding for further development of such facilities should not be at the expense of other community facilities and services.

What Ward Councillors said:

Two Councillors did raise that heritage needs more community buy-in, so the population ‘own’ it.

What Milton Keynes Council departments said:

One team stated that Plan:MK should provide a long-term and sustainable funding source and framework for the provision of tangible and intangible infrastructure required for arts and culture to thrive across MK, perhaps through a cultural investment policy akin to the percent for art policy. They also felt Plan:MK should recognise the importance of the historic environment to the future development of Milton Keynes, particularly in reviewing the historic design principles that have contributed to MK’s success to ensure that it retains its distinct identity. This was supported by another team who believed that Plan:MK should promote further development of heritage, museums and archives, celebrate our World Class MK assets and set a planning framework to protect and enhance them.

It was felt that accessing heritage in MK remains difficult, and there should be investment and development of our internationally important venues and programmes. They also considered that developers on sites local to historic assets or those that contribute to character, should actively involve those assets in their development.
The support in the paper for the importance of libraries nationally and in MK, and the changing nature of libraries and the way they are used, was appreciated.

**What local organisations/interest groups said:**

One local organisation noted that the ensemble value of Milton Keynes should not be overlooked, and that Plan:MK should acknowledge and develop the role of our master plan and early infrastructure as an internationally significant heritage asset. Another local group wished to see heritage topics debated at a facilitated workshop as part of the Local Plan process, and that the Council should make better use of the heritage of MK when promoting the area.

The Parks Trust noted that the development process could capture some value to contribute to increasing access to and understanding of features of heritage value within the parks network, which should be done as part of a wider strategy for heritage.

**Question 3: Healthy and Active Lifestyles**

- What else can Plan:MK do to help encourage people to lead more active, healthier lifestyles?
- What can planning do to make walking and cycling more attractive options for making day-to-day journeys, including commuting to work?
- How can we ensure new developments contribute to improving the health and well-being of residents?

**What members of the public said:**

Comments received from members of the public included:

- The way people spend leisure time has changed, and hasn’t increased in the same way as envisaged in the original Plan for Milton Keynes.
- Would like to see the redways maintained a little better, and extended. Would also like to see more parks and woodland created, and that new developments need more open space and landscaping.

Two respondents supported the provision of exercise stations/Trim Trails, which encourage people to engage in exercise they may not otherwise consider. One also supported linking with schools to encourage people to try new sports or activities, but recognised these must be readily available and affordable. It was also felt that a strong structure of reserve/public space should be designed to give good access and surveillance.

**What Town and Parish Councils said:**

One Council believed that the linear parks and open spaces should be protected from development, and redways extended and improved, including making circular routes, in order to encourage more active lifestyles. They also suggested many ways to make walking and cycling more attractive. They considered that new developments could contribute to the health and well-being of residents by ensuring redways link to open spaces, to provide better links from homes to community focal points, and having a good balance of free and mixed-price facilities. This was echoed by another Council, who believed that preserving and maintaining recreational activities at Willen and nearby areas for walking
is important, plus there is a need for safe and secure cycle and pedestrian routes to surrounding villages in particular. They believe people can be encouraged out of their cars by improving the public transport network, especially for short journeys, accessing leisure activities, and commuting.

Another Council believed the ‘active by design’ guide should be incorporated into developments and that using space standards for new homes would give families room to sit and eat together would encourage healthier lifestyles. They also consider that tougher planning and licencing restrictions should be made to limit the number of fast food, betting and alcohol outlets.

What Ward Councillors said:

Two Councillors felt that to encourage more cycling, some direct redway routes should be identified and signed clearly, with maps, good lighting and visibility. New developments should be planned with walking and cycling in mind from the start.

What Milton Keynes Council departments said:

One team said that Plan:MK should support open-access, well-connected, multi-use public spaces; provide green gym equipment; protect and extend the redways, ensuring that schools and public facilities have access to redways and secure cycle racks. To promote walking and cycling, quicker, more direct routes need to be provided, with improved signage, and avoiding at-grade crossings which slow a cycle-commuter down. They felt the health and well-being of residents could be promoted by ensuring sufficient access to green space, walking/cycle routes, sports facilities and other local services, including primary and acute healthcare.

This was supported by another team who felt that better marketing, use and development of the redways and leisure routes should be a priority, including adding leisure and cultural interest to routes through trails, organised walks etc. Safe, well-signed routes would encourage mobility. They also wished to see a simplified network of faster ‘principal routes’ to key destinations, which could be used as a focus for facilities. They also considered that health and well-being could be supported by creating more attractive and engaging open spaces, with creative interventions, and promoting innovation and excellence through exemplary architecture and design.

It was also recommended that all footpaths are interlinked and safe to use, with the redway network maintained in line with the Cycling Strategy. They wanted to promote walking as the option of choice for travel and recreation, which would also help to manage physical and mental health conditions and is the most sustainable form of transport. They consider that walking and cycling should be treated independently to ensure appropriate networks are developed for each.

What the industry said (e.g. landowners, developers, agents...):

Several landowners/developers promoted their sites, including as enabling development to deliver a country park for the benefit of all MK’s residents; as part of a development to deliver a training ground for the MK Dons which would also benefit local sports teams and the MK Dons Academy.
One local developer said that health and active lifestyles have the propensity to increase both social well-being and economic success, and potential investors should be encouraged to support and promote the active use of the linear parks and attract new venues to promote the International Sporting City.

Another landowner/developer said they include facilities within their developments that make walking and cycling more attractive for day-to-day journeys as well as encouraging people to lead more active and healthier lifestyles. Another promoted their site, stating that the potential linkages the development would create with the open countryside would provide opportunities in terms of health, nature and education.

What national/statutory organisations said:

The Canal and River Trust recognise the role of the canal as a form of strategic health infrastructure, part of the ‘natural health service’, which encourages and supports physical and healthy outdoor activity. The canal provides free opportunities for formal and informal recreation, and has a role in place-making and shaping. They would welcome opportunities to improve accessibility and levels of usage, and proposals that promote the canal as a means of improving culture, education, health and well-being.

What local organisations/interest groups said:

One local society felt that active, healthier lifestyles could be encouraged by providing places where people can enjoy outside activity, including allotments and community gardens and woodland and open spaces for walking and cycling, and extending the redways. They also suggest that people won’t walk or cycle further than 10-15 minutes for work or for day-to-day journeys, so we should look at innovative methods of using the grid roads to provide non-car based alternatives. They also felt that new developments could contribute to improving the health and well-being of residents by providing a multi-use hall, allotments and equipped recreation ground locally, and contributing funds to schools and local organisations that get pupils involved in outdoor activities.

Improved lighting, signage, secure bicycle parking and CCTV to improve security in order to increase bicycle use, was supported by a local sports organisation. They also suggested Plan:MK should review the existing cycling strategy to include the latest innovations in city cycling provision. Further they said that the provision of places for people to be active is of importance in terms of health, productivity and the economy, but a key factor in people’s decisions to participate in sport and physical activity is journey time.

The Parks Trust believe that health and well-being can be promoted by ensuring high quality, attractive useable open spaces are provided within new development areas, and that Plan:MK should capture some of the value from development to contribute to the provision of facilities and features within the parks to promote their use as part of a strategy for healthy and active lifestyles.

Finally, another organisation said that Plan:MK must recognise the role of dance as a healthy activity; visual arts as a means of improving mental health and wellbeing; and public arts as a means to make the redways more attractive and legible, and increasing their safety through greater usage and way-finding.
**Question 4: Sport and Active Communities**

- How can Plan:MK help to ensure that sport and leisure opportunities are realised?
- How can Plan:MK protect existing facilities from changes that affect the overarching strategic objectives?
- Should Plan:MK consider options around funding and delivery arrangements or opportunities for enabling development in the context of developing MK as International Sporting City?

**What members of the public said:**

One respondent identified bell-ringing as a healthy and rewarding activity, which also helps to build civic pride. Another noted the role of dance as a healthy activity, and that support should be given to the emerging dance sector in Milton Keynes.

**What Town and Parish Councils said:**

One Council believed that the reasons for underused and unviable facilities needs to be investigated, and that the overall aim should be to achieve a per capita net gain of facilities. In terms of the International Sporting City, they consider that we could either use it to promote and support bottom-up initiatives, or to help close the gap between those who participate in sport and leisure activities, and those who don’t, and then progress on an international scale.

Two Councils raised the lack of inexpensive or free recreation facilities other than outdoor space or events taking place outdoors as an issue, and that support for low cost participation is essential. It was also felt that the International Sporting City must cover a wide range of sports, not just football, rugby and motorsport.

**What Milton Keynes Council departments said:**

One department stated that there should be neighbourhood level provision for informal sporting activity, and ‘district’ level provision of facilities for a wide range of sports, of a sufficient size for two or more sports halls. Policies should allow appropriate conversion of business units to leisure uses, particularly where this also supports employment.

It was noted that community and sports facilities have continued to be developed despite the economic downturn, and that the Sport and Active Community Strategy identified the need to support and improve existing facilities alongside the need for new facilities. Separately, it was considered that where there are viability concerns with existing facilities, an increase in size or support for diversification should be supported if it would improve viability.

It was felt that the International Sporting City should be supported, as long as there are concessions to encourage grassroots sport. It was also felt that grouping facilities, in locations with excellent transport and utility connections, should be supported, although it was acknowledged that this is likely to require enabling development.

**What neighbouring and other local authorities said:**
Northampton Borough Council identified the work they and South Northamptonshire and Daventry District Councils will be undertaking to look at open space and indoor, outdoor and pitch provision and that this will need to be discussed with MKC.

**What the industry said (e.g. landowners, developers, agents...):**

One respondent promoted their site as a means to deliver a new informal leisure facility, and also as a way of improving the viability of existing facilities. They considered that obligations towards sport and leisure should be secured via CIL.

Another said that Plan:MK should build upon the foundations of the International Sporting City when allocating land for development, and that it should form the cornerstone of the economic development for the city, recognising the economic and regeneration benefits that enabling development can bring.

One developer supports the development of MK as an International Sporting City and the potential this has for ensuring that sport and leisure opportunities are provided for all sectors of the community.

**What national/statutory organisations said:**

Sport England directed us to their ‘Planning for Sport, Forward Planning Guide’.

**What local organisations/interest groups said:**

The Parks Trust wish to see policies that enable appropriate facilities to be developed and funded in parkland settings.

A local society wished to see all developments of more than 30 homes to provide space for open air activity, and all large developments to have a sports/recreation site and multi-purpose hall, in order to maximise opportunities for sport and leisure. They also believe that existing facilities should be protected by policy so that change of use would only be considered in exceptional and evidence based circumstances. They did however feel that the vision needs to be clear, and a decision made as to whether the vision of an International Sporting City was most important and should take precedence.

It was recommended that the role of the Milton Keynes Sports Board should be acknowledged, and that Plan:MK should adopt the recommendations set out in the Sport and Active Community Strategy 2014-2023. They also identified the national guidance, services and bespoke tools developed by Sport England to protect, enhance and develop new and existing facilities. Further they consider that Plan:MK should endorse and support the ambition to become an International Sporting City, recognising the need for investment into the provision of world class events and facilities, with recent successes exemplifying what can be achieved.

**Question 5: Community Facilities**

- How can Plan:MK help to ensure that appropriate community facilities are provided and that existing facilities are protected?

**What members of the public said:**
Community centres should be attached to health centres in new communities.

Dual-use buildings, for example, used as a church on a Sunday and as a community centre the rest of the time, could provide a model of a sustainable facility.

**What Town and Parish Councils said:**

One Council wished to see the ownership of facilities passed to Town or Parish Councils or the local community, while another suggested we need to look more closely at methods of ‘decentralising’ some facilities and doing things differently. Interest was also raised about the need allow room for communities to take initiative and influence what happens with new facilities.

**What Ward Councillors said:**

Ward Councillors supported developments that strengthen communities, and felt that community facilities should be designed and built with the communities and organisations that can make them work.

**What Milton Keynes Council departments said:**

One team discussed the use of tariff contributions from strategic developments and the Local Investment Plan which has enabled a continued programme for new build despite the economic downturn. Similarly, S106 contributions have provided enhancements and improvements to existing facilities. The Sports and Active Communities Strategy 2014-2023 reflects the pressure to build new, while maintaining existing facilities and aims to ensure that funding is evenly distributed. It was noted elsewhere that community facilities should be provided upfront, on public transport routes and alongside other users to aid viability and accessibility.

**What neighbouring and other local authorities said:**

Northampton Borough Council believe that to plan for future requirements, an audit of existing facilities is needed.

**What local organisations/interest groups said:**

One local voluntary group said that neutral community spaces, that are independent and purpose built, and flexible enough to respond to changing needs, are a vital part of a successful community involvement programme and are needed in any new community. They believe that residents should have the opportunity to be involved in the planning, design, delivery and (when the community are able) management of community buildings.

A local organisation made some non-planning suggestions for how to provide and protect community facilities, plus the suggestion of a policy that manages the reuse of redundant buildings for cultural/community use, and encouraging ideas to promote pedestrian flow between shopping and cultural zones, and openness to changes in infrastructure (e.g. changes to pavement levels) to facilitate them.

It was raised that Plan:MK should address faith needs, and the difficulty of finding appropriate spaces for different community groups emphasised, plus the lack of flexibility over uses of buildings that means that some buildings that could be suitable (e.g. unused office spaces) are vacant when they could be serving the community.
Question 6: Community Cohesion

- What measures do you think could be used to help create and maintain cohesive communities, that encourage diversity and reduce inequalities between areas, to help foster good community relations?

What members of the public said:

Comments from members of the public to this question included:

- Plan:MK should take a broader view of community cohesion and give importance to the support that religious and ethnic communities give to their members, which will often be greater than the support of their local community; it shouldn’t necessarily be about coherent local communities.
- Wording used should therefore reflect the different sorts of communities (e.g. ethnic minority communities, religious communities) which may not belong to a particular location.
- Involvement in religion is increasing, but it won’t bring people of all backgrounds together; it has always divided people. Political activity may be more likely to bring people from all backgrounds together.
- Supporting and encouraging all communities to become actively engaged will help to protect facilities while also possibly diverting those less community-minded to become more so.

What Town and Parish Councils said:

One Council believed that ‘over-planning’ should be avoided so that local people have a sense that they have a real say in building their community. It was also suggested that Plan:MK should look towards its communities first and foremost and only secondarily to national and international ‘markets’.

Another Council commended the idea of ‘lifetime neighbourhoods’, and see a role for community mobilisers in building links between new and old areas to promote cohesion.

What Milton Keynes Council departments said:

One team encouraged ‘smart’ neighbourhoods where communities can be self-reliant but with facilities that bring people together. Another agreed that the development of cohesive and healthy communities plays an important role in reducing deprivation and addressing inequalities, and that ‘Lifetime Neighbourhoods’ could be part of that.

What neighbouring and other local authorities said:

Northampton Borough Council believe that good design principles need to be established that promote connectivity and active frontages, particularly at a local level.

What local organisations/interest groups said:
A local voluntary organisation believed that Plan:MK needs to have more of a focus on the importance of people, and that ‘social infrastructure’ should cover the human element too, not just the physical environment. They also note that community involvement and a community development programme should be a core component in the development of new developments across the city.

The Parks Trust noted that the design of parks and open spaces can have an important bearing on how spaces are used, and that the plan should contain policies that ensure adequate provision of parkland and open space, and sets the framework for the types of spaces and how they are designed.

A local organisation wished to see support for creative activities as a means to draw communities together and inspire community engagement, and they note that collaborations have proved particularly effective between cultural and community organisations, which attract a diverse participation. Another believed mention should have been made of the MK Theatre and the Stables.
10 Open Space and the Natural Environment

Summary

This Topic Paper covered issues including how to protect and enhance the Borough’s open spaces and GI (Green Infrastructure). It also looked at how to minimise developments impact on biodiversity and provide a net gain in biodiversity. The Paper also considered what policies Plan:MK should include to best protect our landscape. 75 responses were received from 26 individuals and organisations.

The majority of responses were submitted by local organisations and Town and Parish Councils, but there were also a number of responses from the neighbouring authorities, and some from agents and members of the public. There was overall recognition that the Borough’s open space and green infrastructure need to be protected and enhanced. The majority of respondents recommended that Plan:MK should have a policy of a general presumption against development of any parkland/public open space.

Many respondents also recognised the potential of open space and natural environment to improve mental and physical health.

There was general consensus that the linear park network should be protected, enhanced and extended where possible as should the other green spaces of the city. Some respondents called for Plan:MK to include a strategy that establishes a green buffer zone that protects the long term urban/rural boundary of the city.

Many respondents highlighted the importance of connectivity for delivering high quality green infrastructure and protecting biodiversity. Also, there was a general support for new areas of green spaces to be linked with the wider green infrastructure network.

The majority of respondents agreed that Plan:MK should be supported by a comprehensive open space assessment and that it should have clear policies for how new open space should be laid out so that it is of a good quality and has been designed so that it can be sustainably maintained. The majority of the respondents also agreed that the current Local Plan Policy L3 with its Appendix should be reviewed.

There was less consensus on whether playing pitches should be fenced or not with the majority of respondents disagreeing with fencing off playing fields.

On the question of biodiversity offsetting, the majority of respondents agreed that offsetting should remain “a last resort” and that the mitigation hierarchy that include three basic steps (avoid, mitigate/minimise and compensate any residual impact) should be recognised in Plan:MK. There was also agreement that certain habitats (e.g. ancient woodland) are impossible to re-create. Overall there was support for the Wildlife Trust’s position about biodiversity offsetting. Some respondents emphasised the need for a robust system to be in place to ensure that offsets are maintained in perpetuity. The majority of respondents agreed with promoting biodiversity and GI projects in the Biodiversity Opportunity Areas and selected urban areas.

On the question of landscape protection, there was a consensus that in order to protect and enhance landscape a criteria-based approach is more appropriate than an area designation.
Overall Comments

What Town and Parish Councils said:

One Town Council stated that the valley of the River Great Ouse is and will continue to be a site for the extraction of sand and gravel. Restoration of any minerals extraction sites should be designated and planned as new green space with a view to it becoming a nature reserve once the extraction activities have been completed. Using the Duty to Co-operate, the plan should also ensure that the same designation is given to those minerals sites currently being worked in Northamptonshire.

What Ward Councillors said:

Two Councillors supported the comments of the Parks Trust and referred to the comments in their submission to the Site Allocations document.

What neighbouring and other local authorities said:

Buckinghamshire County Council noted that the Topic Paper makes welcome acknowledgement of the cross boundary priorities and objectives set out in the Buckinghamshire Green Infrastructure Strategy (2009) and Green Infrastructure Delivery Plan (2013). The Whaddon Chase area could be a major green infrastructure asset for Milton Keynes and reference should be made to the Whaddon Chase Green Infrastructure Plan (2010) which details specific aspirations for the area.

What national/statutory organisations said:

Natural England commented that high quality open space throughout the Borough are key to the character of Milton Keynes. A robust well planned green infrastructure can provide a multitude of benefits including access and recreation, health and well-being, food growing, climate change adaptation and habitat for wildlife. To emphasise the value of green infrastructure it should be woven throughout each section of the plan such as the setting for housing and commercial sites, transport, rural issues, climate change, recreation and well-being, wildlife. This would reflect the Milton Keynes Green infrastructure Plan and Strategy and promote a landscape scale approach.

What local organisations/interest groups said:

The Parks Trust made a series of detailed points of clarification regarding the background and context in the Topic Paper. In addition, they also stated that:

- The Trust would support a specific policy in Plan:MK that all new areas of open space and parks are by default offered to the Trust along with an endowment to cover future maintenance.
- Clarification will be required in the policy over how town/parish councils can liaise with The Parks Trust over the adoption of parkland/open space.
- Plan:MK must be based on a more robust assessment of need and set clear priorities and requirements for the GI network according to how MK is planned to develop.

Berks, Bucks and Oxon Wildlife Trust highlighted their support for references to:

- The importance of Biodiversity Opportunity Areas
- the Biodiversity Action Plan
10 Open Space and the Natural Environment

- priority habitats
- wildlife corridors and LWSs
- key biodiversity related extracts from the NPPF:
- other key relevant national documents such as the Natural Environment White Paper, Making Space for Nature, UK NEA
- the key biodiversity elements of the MK Core Strategy and 2005 Local Plan:
- connectivity, SSSIs, wildlife corridors, GI
- the NEP.

They also raised several points of clarification and amendments to the background context to the Topic Paper.

**Question 1: Open Space Management**

- How could Plan:MK influence open space management so it delivers a robust green infrastructure.
- How do we ensure that development does not result in fragmentation/or prevent better integration of green infrastructure networks?
- Should Plan:MK introduce requirements to ensure that playing pitches are fenced in order to prevent their surface being damaged?

**What members of the public said:**

- The boundaries to the linear parks, country parks, areas of attractive landscape etc should be firmly established and protected in perpetuity
- Many footpaths bridleways and cycle paths are just cul-de-sacs or are just not joined up
- The people of Newport Pagnell feel very strongly that Bury Field needs to be protected for all the population in perpetuity
- Land east of the M1 motorway, opposite Broughton, seems to be excluded from any development provisions. This seems to be illogical as opening up that area, an ideal location for development, should be seriously considered ahead of areas such as the Ouse Valley
- Halting the long-term decline in biodiversity and mitigating the threats to the 'ecosystem services' upon which we rely should be overriding priorities, never to be compromised by short-term economic expediencies
- Playing fields should not be fenced off; public space is for the public
- Linear Parks and Parks Trust - this is an excellent feature of Milton Keynes
- Any extension of the Town should extend the linear parks outwards to the flanks

**What Town and Parish Councils said:**

One Parish Council said that the green areas amongst and around housing estates, playing fields, village greens, the conservation areas in the older parts and, the linear parks must be protected from development at all costs. No infilling or 'nibbling away' should be allowed under any circumstance.
Another Parish Council believed that the new Plan could influence open space management by promotion and responses to and from town and parish councils, both before and after the Plan:MK is established. The same applies to ensuring that development does not result in fragmentation/or prevent better integration of green infrastructure networks.

It was also stated that the Plan should ensure that the principles and policies relating to Open Space, Historic and Natural Environment contained within the Core Strategy and Green Infrastructure Plan are continued going forward. Piecemeal developments that fracture recognised Linear Parks, Wildlife Corridors and disconnect the city from the surrounding greenbelt and natural landscape should be discouraged. Likewise, developments should not isolate communities from natural places.

One Council believed that an open space strategy/policy specifying the roles of open spaces ranging from sport/leisure to biodiversity would influence open space management. It should be coherent in terms of maintaining and improving quality of (human) life and biodiversity, i.e. linked spaces and corridors which are considered to be increasingly important with climate change.

In order to prevent fragmentation of green infrastructure networks MKC should create, maintain and extend green corridors, protect and extend the linear park and woodland areas that give MK its special character, and ensure that rural open space and SSSIs are accessible. Fragmentation can also be prevented by identification and design of new development of any size and delimiting urban development boundaries.

It was also raised that devolution of management of public space to Parish and Town Councils requires co-ordination and collaboration within an overarching strategy/policy.

Very active uses of open space would be consistent with Plan:MK’s suggested strategy for promoting healthy and active life styles and infrastructure for social interaction.

Fencing should be dependent on local circumstances and pitch surface types. If dog fouling is the issue then this is an MK-wide problem particularly in recreation/play areas and could be addressed in appropriate ways, e.g. public education etc.

One rural Parish Council stated that green infrastructure is sound so long as development is restricted to limited infilling in village, conversion of redundant buildings and ‘rural appropriate’ development and that it should be optional for playing pitches to be fenced.

An urban Parish Council believed that clear policies are needed for new open spaces to ensure that development does not result in fragmentation, or prevent better integration of green infrastructure networks. They also said that playing fields should not be fenced off as the harm fencing causes to a community can be seen at Tattenhoe Pavilion where the MK College pitch is fenced and causes annoyance to the residents.

A Town Council believed that fencing sports pitches would deter informal play and discourage participation. The development of commuted sums for sports pitches to safeguard the future seems a robust way forward

**What Ward Councillors said:**

- The linear park network should be protected and where possible enhanced as should the other green spaces of the city.
- The land off Calverton Road, Stony Stratford should be added to the Ouse Valley green space (as proposed in the Stony Stratford Draft Neighbourhood Plan).
- The Western Expansion Area includes a significant landscape buffer to its outer edge, which should not be eroded by further development of the areas to the west of Stony Stratford and of the WEA.
- Calverton and Whaddon should remain as separate village communities and the attractive open countryside which separates them from the urban area retained.
- Plan:MK should include a strategy that establishes a green buffer zone that protects the long term urban/rural boundary of the city.
- Plan:MK should safeguard current valuable ‘green lungs’, echoing the comments made in response to the Site Allocations Plan.
- Please note the importance given to green spaces in the draft Stony Stratford Neighbourhood Plan.
- Large sports ground, recreation and play area on Crownhill including fine avenues of trees are valued by local residents and the Parish Council

What Milton Keynes Council departments said:

One team made the following comments:

- Plan:MK would positively influence open space management by providing policies to protect the current green infrastructure; encouraging the cooperation of land management bodies; and supporting the development of future provision.
- In order to avoid fragmentation or prevent better integration of green infrastructure networks, policies should support the extension of current green infrastructure into urban extensions; necessitate assessment of the natural environment within development frameworks and design briefs; support the delivery of the objectives of the Green Infrastructure Plan including the Green Infrastructure Opportunity Areas and Green Infrastructure Action Areas; ensure key green infrastructure bodies are consulted on major developments at the earliest opportunity; explore opportunities to link wildlife areas and provide for biodiversity corridors; and seek to incorporate green infrastructure into development as a feature and not an afterthought.
- Playing pitches should only be fenced off in exceptional circumstances where it can be proven that the impact on quality of the facility would so negatively affect the performance level of primary users as to threaten future viability of the facility. Most playing pitches should be open to all, but because some sport National Governing Bodies assert certain standards on facilities for teams to compete at different levels, this means some protection should be afforded to allow for sport at higher performance levels, which in turn may generate other investment to make the venue financially viable.

Another made the following points

- The emerging playing fields strategy to be adopted in 2015 identifies site specific areas of priority for sport and leisure facilities, supported by the relevant national governing bodies to ensure deliverability and to allow funding to be directed in areas of most need or accessibility.
- The consultation on the strategy does identify a need for fencing where possible to protect the playing pitches. However this is likely to be unachievable on existing sites as most of the pitches are on a mixed use site with open space.
• Future areas of development should make separate provision to the open space and in larger more defined areas for sporting use. This will ensure resources can be concentrated in one area ensuring greater viability to the whole facility.
• It is recommended that Plan:MK promotes the new Playing Pitch Strategy (to be adopted in 2015) and recognises the importance of separate defined areas for playing fields in the new development areas.

What the industry said (e.g. landowners, developers, agents...):

• The Plan should encourage open space be integrated in to new development proposals and not an afterthought.
• One agent promoted their site as having open space at its heart with a Country Park linking the northern linear park, opening it up to the public, which can only be achieved via enabling development.
• Planning obligations should also be secured from other developments if they are unable to provide adequate open space (such as smaller sites where it is unviable) to improve the quality of proposed and existing open spaces.

What national/statutory organisations said:

Natural England made the following points

• Regular revision of the Green Infrastructure Strategy will map out new areas of GI and help to identify need and potential projects in advance of developments.
• New areas of green spaces should be linked with the wider Green Infrastructure network and provide space and quality reflected in existing parkland reducing the need to additional car journeys to other sites.
• Providing a well-managed accessible network of quality parks and green spaces will contribute to the City’s Green Infrastructure and can provide the framework for environmentally sustainable development.
• Poor quality greenspaces can have negative effects through increased fear of crime and decreased social interaction. Providing greenspace that meets quality standards for accessible parks and greenspace, such as the Green Flag Award, Country Parks Accreditation and the Local Nature Reserve visitor standards can be a way to increase visitor enjoyment.
• They suggest making reference to Natural England’s Nature Nearby Accessible Natural Greenspace Guidance which aims to assist those planning and managing greenspace, providing a source of advice and support for delivering high quality nature nearby.
• Several reviews (including the Marmot Review) point to the potential of natural environments to improve mental and physical health.
• Living close to areas with more green spaces was associated with fewer mental health problems; the relation was stronger for people with a lower socioeconomic status.

What local organisations/interest groups said:

The Parks Trust stated that strategies for open space/green infrastructure should address current gaps/fragmented sites in the network and identify how the network should be extended in line with the overall development strategy for MK into growth and expansion areas. These strategies should identify the priority areas where the linear park system in particular should be extended.
They believe Plan:MK should adopt policies that will prevent the fragmentation or lost opportunities to better-integrate green infrastructure network and should establish clear policy mechanisms for the extension of the park network in to any expansion areas and for the upgrade of facilities in existing areas of linear park to the meet higher demand arising from new development and growth.

They also made the following points:

- There should be an appropriate strategically-planned hierarchy of parkland/open space types to meet the growing needs of MK as it expands, ranging from the provision of well-equipped larger ‘destination’ sites through to locally accessible sites.
- Plan:MK should be supported by a comprehensive assessment of open space and green infrastructure which should identify, using a criteria-based approach and informed by need and demand, where there are current shortcomings on the quality and/or quantity of open space provision and recreational facilities.
- The assessment could be used by managers of existing open space to set priorities and target resources.
- Plan:MK should set clear policies for how new open space should be laid out such that it is of a good quality and has been designed such that it can be sustainably maintained.
- Plan:MK should set a clear requirement for new areas of open space to be transferred together with an adequate endowment and/or income generating facilities within the open space to offset maintenance costs to an appropriate body. In our view this should be the Parks Trust by default.
- Plan:MK should have a policy of a general presumption against development of any parkland/public open space.
- If the Council adopts a policy that would allow limited development on parkland any such development should only be considered if it is planned in a strategically way and on basis of evidence obtained through a thorough criteria-based open space/green infrastructure assessment.
- They also identified principles that should be established when considering development on an area of parkland.
- On the question of fencing playing fields, it is important to ensure that overall there are sufficient areas available for informal ball games in locations that do not cause annoyance since an unintended consequence of fencing playing fields might be to displace informal games to inappropriate areas.

Berks, Bucks and Oxon Wildlife Trust identified the “Biodiversity and Planning in Buckinghamshire” document as part of the evidence base for Plan:MK.

- They believe that Plan:MK should include a policy that expects very high standards from developers with respect to biodiversity within green spaces in new developments, and biodiversity within the built environment.
- There should be a clear monitoring protocol in place to ensure that commitments made in the planning process with respect to management for biodiversity are followed through.
- Land managed by Milton Keynes Council and partner organisations should be managed in a favourable way for wildlife e.g. by taking opportunities to provide wildflower-rich meadows and other habitats.
- They also point to the recommendations of the recent government “National Pollinator Strategy” which highlights how vital it is that green space contributes to biodiversity,
through for example provision of flower rich habitats that also support a diverse range of pollinators

- Plan:MK should identify opportunities where priority habitats (Section 41 habitats under the NERC Act 2006) can be maintained, restored and created within Milton Keynes and ensure that key designated sites and corridors including SSSIs, Local Wildlife Sites, Biological Notification Sites, and Milton Keynes Wildlife Corridors, and priority habitat (under Section 41 of the NERC Act 2006), are protected from development.

- Plan:MK should ensure that development which would prevent the aims of Biodiversity Opportunity Areas from being achieved is not permitted, and ensure that as far as possible off-site compensation is located in Biodiversity Opportunity Areas (BOAs), and that contributions to habitat enrichment in the BOAs are sought from appropriate developments.

Question 2: Open Space Assessments

- Should an Open Space Assessment be carried out for Plan MK? Should it include all the existing open space?
- Should Plan:MK identify standards for quality, quantity and accessibility of open space and develop an Open Space Audit/Assessment methodology?
- Should the existing requirements for open space (Local Plan Policy L3 and Appendix L3) be reviewed, or are the standards still effective?

What members of the public said:

One respondent commented that an Open Space Assessment should probably be carried out for Plan MK. It was also proposed that the assessment should devote a large section to protecting and enhancing the Area of Attractive Landscape around the Brickhills and Woburn Sands since this area is of benefit to the whole community and not just “locals.”

What Town and Parish Councils said:

All of the Town and Parish Councils responding to this question supported an Open Space Assessment.

One Parish Council stated that an Open Space Assessment should be carried out for Plan:MK but that Parish and Town Councils should be consulted before any assessment is undertaken and that it should include all the existing open space. They agreed that Plan:MK should identify standards for quality, quantity and accessibility of open space and develop an open space audit/assessment methodology but only on land owned by MKC and not private land. They believed the standards for open space (Local Plan Policy L3 and Appendix L3) are still effective.

Another Parish Council said it may be appropriate to ring fence Open Space Categories (Table 1 of the Topic Paper) where reductions in that particular category of space might leave a shortage or imbalance that could not easily be replaced. e.g. Areas of Wildlife interest, Historic/Heritage sites, Destination and Linear Parks. Areas recognised to be of particularly valuable biodiversity and/or attractive landscape should be permanently set aside and excluded from consideration as potential future development sites.
Another Parish Council agreed that Plan:MK should identify standards for quality, quantity and accessibility of open space and develop an Open Space Audit/Assessment methodology as appropriate and effective management cannot take place without setting objectives. Local Plan Policy L3 and Appendix L3 should be reviewed. Appendix L3 does not appear to cover open space of less than 0.2 hectares. Smaller spaces are often locally important and may provide useful ‘green links’ between larger open spaces.

A rural Parish Council commented that in all developments happening on the eastern side of the city there is good open space provision. This is also the case for rural areas.

An urban parish believed that Plan:MK should be supported by a comprehensive assessment of open space which should be reassessed regularly to ensure the open space in our city is protected from development.

One Town Council supported the idea that Plan:MK should identify standards for quality, quantity and accessibility of open space, and carry out an audit and develop an assessment methodology. The current Local Plan and Core Strategy offers good protection for the open spaces in the Borough and the Town Council would want to see these standards reflected in Plan:MK.

**What Milton Keynes Council departments said:**

One department agreed that an Open Space Assessment covering all open space should be carried out for Plan:MK. Standards for quality, quantity and accessibility of open space and any Open Space Audit/Assessment methodology must be linked to sustainability and future management of green assets to ensure they do not deteriorate over time but mature and can be well cared-for at an affordable level. They also said that Local Plan Policy L3 and Appendix L3 should be reviewed to ensure that the standards are still effective.

Another team raised that research links the quality of public spaces links to levels of health, crime and the quality of life in every neighbourhood. They felt the Paper strikes the right balance between protecting existing areas and allowing for them to be redeveloped in appropriate circumstances. They noted that Policy L2 currently states that “it is not intended that policy should preclude infill housing development on appropriate sites where proposals satisfy the criteria listed in Policy L2 and Appendix L2.” and they would urge that similar wording should continue to be used in any new or replacement policy for L2. They suggest a definition of the “Amenity or incidental space” (Table 1 on page 17) should be amended to read “These spaces play an important role in defining the character of the estates and generally provide opportunities for informal activities close to home or work.”, and felt that the open space provision standards as set out in Policy L3 and Appendix L3 should be reviewed.

**What neighbouring and other local authorities said:**

Northampton Borough Council mentioned the work they are doing with South Northamptonshire Council and Daventry District Council on a comprehensive Open Space Study which will address all aspects of sport and recreation, both within the natural and built environment. There is a need to work with the officers from these authorities as part of the Duty to Cooperate, as well as the need to consider potentially sharing facilities/improving accessibility to overcome issues of identified deficiencies.

**What the industry said (e.g. landowners, developers, agents...):**
Plan:MK should be supported by an Open Space Assessment, to provide an evidence base to the document and justify policy and decisions and identify any areas where open space is lacking.

One agent identified their site as a location suitable for providing additional open space, which can only be delivered with enabling development; as the site is currently private and the owner needs to see a capital return in order to cease its existing use and make the site open to the public.

What local organisations/interest groups said:

The Parks Trust felt that:

- Plan:MK should be supported by a comprehensive assessment of open space and green infrastructure which identifies the quantity, type and, using a criteria-based approach, the quality/condition of open space provision.
- This assessment should be set against an assessment of current and future (according to the development strategy) needs and demand.
- The Council should work with the Parks Trust and Parish and Town Councils in this assessment. Further to this, the assessment must be maintained and be kept responsive to change as development and regeneration occurs.
- They also said that Plan:MK should identify standards for quality, quantity and accessibility of open space and develop an Open Space Audit/Assessment methodology.
- They also considered that Local Plan Policy L3 and Appendix L3 should be reviewed because
  - The current policy lacks specific provision for the extension of the linear park network or how areas of ‘structural landscaping’ should be incorporated as part of a connected network of open space. They said that there has been a tendency with the current policy for scattered and nucleated provision of play areas, often designed only to the minimum offset distance from residential properties which has often proved inadequate in avoiding conflict between the play areas and surrounding residential properties.
  - The policy tends not to encourage the provision of areas suitable for ‘natural play’.
  - The current policy lacks the requirement for new development to lay out the open space, in particular play areas, sufficiently in advance of surrounding housing development.
  - The current policy also lacks anything for the provision of larger (‘destination’) sites and facilities, which could be based in existing or new linear parks. Even though individual developments may not justify such provision the open space policy, could require a contribution to the off-site provision of such sites/facilities.

Berks, Bucks and Oxon Wildlife Trust support an Open Space Assessment for Plan:MK which must include biodiversity as a key element of what is assessed and opportunities for enhancing open space for biodiversity. It should include all existing open space within reason, and not exclude the small areas of land within the built environment where changes in management could make a dramatically positive difference for both biodiversity and the enjoyment of the local area for local people.
10 Open Space and the Natural Environment

The Wildlife Trust would welcome the opportunity to be involved in helping to formulate any the assessment criteria or standards for quality, quantity and accessibility of open space, which must include biodiversity with new standards looking at opportunities for enhancing open space for biodiversity. Similarly, the standards should not exclude the small areas of land within the built environment. Local Plan Policy L3 and Appendix L3 should undoubtedly be reviewed as they do not currently reflect the opportunity provided by Open Space for biodiversity delivery and the Trust wish to be involved in the review process. All open spaces, even where wildlife is not the primary outcome of the Open Space can nevertheless provide significant biodiversity outcomes of benefit to both wildlife and people.

A local society also supported an Open Space Assessment for Plan:MK which should at least provide a base line in addition to the 1970 plan, that whilst it should not be reduced, it would give an idea of what the use or state such open space is, in order that it can be enhanced, whether for people or biodiversity. Plan:MK should identify standards for quality, quantity and accessibility of open space and develop and open space assessment methodology as this would provide a framework for future work to build on and enhance the existing and future open space. And while the Local Plan Policy L3 and Appendix L3 are effective, a review to see if they could be further improved could be useful.

The Canal and River Trust noted the Council’s recognition of the importance of the Grand Union Canal and its corridor as important open space and valuable multi-functional green infrastructure, as well as for its rich biodiversity, and would welcome the inclusion of all the Buckinghamshire canals and the proposed Bedford Milton Keynes Waterway on a list of high priority projects for both funding and biodiversity offsetting.

Question 3: Biodiversity Offsetting

- Would you agree that Biodiversity Offsetting could be an efficient and transparent way to ensure there is biodiversity gain through development?
- Would you like to see Biodiversity Offsetting becoming mandatory for developments above certain thresholds? If yes, what should these thresholds be?
- Should Plan:MK promote/prioritise biodiversity and green infrastructure improvement projects located within the broad areas identified in Figure 3 ‘Biodiversity Opportunity Areas in Milton Keynes and North Buckinghamshire’ and Figure 5 ‘Major open spaces, 1970 Plan for Milton Keynes’ of this paper?

What members of the public said:

- Two respondents expressed reservations about biodiversity offsetting and said that ‘biodiversity offsetting’ is inappropriate in many contexts.
- Some flora cannot be readily planted as the conditions it requires take centuries to create and cannot be imitated for the purposes of biodiversity offsetting (e.g. ancient woodland and its flora).
- Measures such as biodiversity offsetting are susceptible to being driven by commercial and political expediency
- The concept may seem to suggest that it is generally possible and relatively easy to offset biodiversity, so long as funding is provided but this has the potential to distort thinking about the ecological realities.
It is another cost that developers will be reluctant to add to their other planning obligations.

In Milton Keynes there should be more robust position of protection of widespread habitats of biodiversity value, which has up to now ensured 'living landscapes' full of wildlife.

One of the respondents agreed that Plan:MK should promote/prioritise biodiversity and green infrastructure improvement projects located within the Biodiversity Opportunity Areas and the major open spaces in the urban area of Milton Keynes.

What Town and Parish Councils said:

One Parish Council agreed that Biodiversity Offsetting could be an efficient and transparent way to ensure there is biodiversity gain through development. They said it should not become mandatory for developments above certain thresholds and would suggest this could be added to planning applications for areas thought to be in need of attention to Biodiversity. Plan:MK should only promote/prioritise Biodiversity at the planning application stage by prior consultation with Parish and Town Councils.

Another Parish Council were concerned that the destruction of complex and site specific biodiversity cannot be offset. Offsetting will not prevent biodiversity loss but could easily become an expedient way to trash biodiversity and allow developers to bypass regulations. They say Biodiversity Offsetting could be appropriate for area of relatively low biodiversity where it can clearly be demonstrated there is no threat of loss to important, threatened or locally rare species. Nature conservation designations as proposed in the MK Local Plan should be continued and prioritised as part of Plan:MK and high value biodiversity habitats and sites such as Hanson Environmental Study Centre and its surrounding area should be recognised and given appropriate status (LNR/possibly SSSI) and protection.

One Parish Council made the point that a wildlife habitat is local and specific. Exchanging 'like with like' may not provide a species, endangered or not, with an alternative habitat. Piecemeal offsets can result in 'eco-islands' with no links to others, reducing biodiversity and increasing vulnerability. Climate change brings additional demands for linking open spaces, not just within the confines of a Borough or County. The consensus among legislators and conservationists is that offsetting should be the last resort and Plan:MK perhaps simplifies questions of biodiversity too much. While the mitigation hierarchy is applied as a theoretical principle, some doubts remain about practical implementation in some cases e.g. for the avoidance and minimisation steps. They question if Biodiversity Offsetting result in outcomes that are additional.

A rural Parish Council agreed to Biodiversity Offsetting, but that it should not be done at the expense of production in the countryside as that is a significant economic contributor to the area.

Another Town Council also agreed with the concept of Biodiversity offsetting, but did not agree that major open spaces should benefit from planning gain (S106 or CIL) as it will compete with other priorities within the agreements.

What Milton Keynes Council departments said:

One team supported an approach that can allow for best practice in Biodiversity Offsetting to be applied to future development. Biodiversity gain should be seen for every major development and the use of Biodiversity Offsetting could be applicable but must be weighed against viability of development. The threshold for Biodiversity Offsetting should be low
if applied, perhaps consistent with affordable homes. They also said that Plan:MK should promote biodiversity and green infrastructure improvement projects located within the broad areas Biodiversity Opportunity Areas and major open spaces in the urban area.

What neighbouring and other local authorities said:

The West Northamptonshire Joint Planning Unit (JPU) identified two Biodiversity Opportunity Areas that adjoin West Northamptonshire - Yardley Chase and Ouse Valley, and support a policy that seeks opportunities for habitat protection, restoration and creation of those areas which takes account of the recently adopted West Northamptonshire Joint Core Strategy (JCS). The JPU would welcome discussions with Milton Keynes Council about this and other cross-boundary issues.

What the industry said (e.g. landowners, developers, agents...):

- A flexible approach should be adopted to allow developments to either mitigate their impact on biodiversity on-site or off-site via contribution to secure the greatest biodiversity improvement.
- One agent promoted their site as a prime opportunity to undertake Biodiversity Offsetting with the creation of a Country Park with enabling development.
- They said that developers across Milton Keynes Borough could mitigate the loss of habitats and species by creating, enhancing or restoring habitats in the Country Park via planning obligations, to create a natural visitor destination in the north of the town.
- Should offsetting not be feasible on-site, it would be helpful and transparent from a developer viewpoint for the Council to set out a list of specific projects on which the financial obligations can be spent.

What local organisations/interest groups said:

The Parks Trust is cautious about the merits of Biodiversity Offsetting in delivering real biodiversity gains since certain habitats such as ancient woodland are impossible to effectively re-create. They recommend that MKC very carefully consider the pros and cons of adopting such a policy, and referred to the the Wildlife Trust’s position about Biodiversity Offsetting, which is set out by a four-stage assessment of the appropriateness of applying the principle. They highlighted that the information behind the strategy and policy basis for Plan:MK needs to be kept up to date and the objectives, targets and priorities kept under review. This should be discussed and clarified with the Natural Environment Partnership. The Parks Trust has developed a Biodiversity Action Plan for its land holdings and there would be benefit in the Council working with the Parks Trust to maintain up-to date information about biodiversity and conservation priorities and opportunities. In particular this would be helpful in informing development management and the strategy for the extension of the GI network.

Berks, Bucks and Oxon Wildlife Trust believe it is conceivable that Biodiversity Offsetting could be a helpful mechanism in some circumstances to help deliver biodiversity gain, but if established in the wrong way Biodiversity Offsetting could lead to far greater negative impacts. Use of “Biodiversity Offsetting Metrics”, can provide a helpful, transparent approach to how net gain has been considered in planning processes. There should be no change to the mitigation hierarchy that ensures activities do not have unnecessary impacts on the environment and no change in the planning protection afforded to SACs, SSSIs, LWSs, BNSs, Irreplaceable habitats, Priority habitats, Protected Species and Priority Species
- harm should be avoided. The use of the term Biodiversity Offsetting should not imply that off-site compensation becomes a norm – it should remain a “last resort”. They Plan should consider how unallocated sites coming forward would have to comply with the hierarchy.

They provided further comments on how the system should work in practise and their wish to be involved in identifying priority projects.

A local society felt that Biodiversity Offsetting is just another tool in the developers armoury to get round objections on the negative impact on biodiversity. Loss of biodiverse land to development should follow a process of the mitigation hierarchy. We have some very special sites throughout MK authority area, and building on these sites under the guise of Biodiversity Offsetting just ensures loss of biodiversity. Plan:MK should promote/prioritise biodiversity and green infrastructure improvement projects located within the Biodiversity Opportunity Areas and in the suggested urban areas provided that

- development impacts on biodiversity and green infrastructure cross boundaries and
- the fact assessment may identify areas within MK that should be given priority and added to the list.

**Question 4: Area Designation**

- Do you agree that in order to protect and enhance our landscape a criteria-based policy approach is more appropriate than an area designation?
- Do you think it will allow a more site specific appraisal on a case by case basis?

What Town and Parish Councils said:

One Parish Council agreed there could be a possible benefit if a criteria-based policy approach was used in order to protect and enhance our landscape rather than an area designation, which would allow a more site specific appraisal of impact by only on a case by case basis as suggested.

Another Parish agreed that a criteria based approach could work well for many locations and would allow a more site specific appraisal of impact on a case by case basis. However, when assessing sites of locally recognised biodiversity and habitat, appropriate credence should be given to scientific evidence and to the comments of relevant conservation organisations and stakeholder groups.

One Town Council commented that the Borough’s countryside should be protected as a whole rather than identify a strategic landscape or development creep will continue expanding ever further.

Another Parish Council stated that criteria need to be evidence-based and that a criteria-based policy has the potential to place some parts of the landscape at risk, although it would allow a more site specific appraisal of impact on a case by case basis. They believed that the policy should include whether or not a landscape can be restored or enhanced.

Finally, one Parish Council believed that a criteria based policy approach would give a more cohesive approach for the whole city.
What Milton Keynes Council departments said:

One team agreed to both elements of the question.

What the industry said (e.g. landowners, developers, agents...):

An agent promoting land for development supported the approach of criteria-based policy since a site specific assessment would ensure the best features are retained without sterilising large areas of land unnecessarily.

Another agent representing renewable energy industry commented that criteria are certainly useful in deciding questions on all landscapes, but the most valuable areas should still be designated. A Landscape Character Assessment and Landscape Capacity Study forming the basis of strategic policy guidance towards wind turbines and solar photovoltaic developments would help identify and guide developers to suitable locations for renewable energy development. Such assessment should be prepared in full co-operation and consultation with relevant stakeholders and should be mindful of the longevity of Plan:MK which would require re-assessment at appropriate intervals.

What local organisations/interest groups said:

The Parks Trust has adopted a criteria-based approach in assessing its parks and landscapes in order to prioritise its management and target its resources and believe there is merit in applying such an approach as part of a wider strategy to protect and enhance landscape. The policy should embrace the concept of local character and how this may in some circumstances be enhanced by sensitively placed and designed development. A criteria-based policy would facilitate site based appraisals and local character-based appraisals should also be applied when considering the effect of development surrounding the parks and open spaces. In particular this should consider the effect on high profile parks such as Campbell Park and those with a more rural character such as the Ouse and Ouzel Valley Linear Parks.

A local society could support a criteria based assessment, depending on what the criteria are. An area based designation takes into context the wider setting and contributors to the landscape - to move to a criteria based assessment especially when linked to a landscape capacity assessment, rings our alarm bells.
11 Climate Change and Sustainability

Summary

This Topic Paper covered issues including the need for local sustainable construction standards; on-site renewable energy requirements; the use of local Carbon Offset Funds and Allowable Solutions; renewable energy and low carbon technology schemes; and flood and water management policies. Overall 79 individual comments were received from 32 individuals and organisations.

There was some criticism of the lack of specific options as to how Milton Keynes can become more sustainable especially given how dominant the car is at present. The Paper was criticised for its overreliance on sustainable construction and renewable energy. An issue of the inequality of access for those without access to a car and that the impact it has on social cohesion was also brought up.

On the question of renewable energy, there was general agreement that Plan:MK should support renewable energy in the Borough. It was noticeable that members of the public would prefer solar energy installations over wind turbines, especially if the latter are in larger more industrial forms. The majority of individual respondents would favour roof mounted solar panel over other types of renewable installations. Nearly all comments made by the industry stressed that all types of renewable energy generation should in principle be supported and that restricting the types of renewable energy schemes to be offered support in Plan:MK would conflict with the National Planning Policy Framework. The industry and also a local society stressed that each application (including renewable energy schemes) must be determined on its own merits.

With the exception of representations made by the industry all comments broadly supported the requirement for on-site renewable energy in new housing and commercial developments. There was less consensus whether there should be any specific thresholds or targets for on-site renewable energy, but a number of respondents considered the current Local Plan Policy D4 requirements as appropriate. The Lib Dem Group would support a new policy covering all the aspects that are covered by Policy D4, and making them local policy with a proviso that the relevant aspects may be over-ridden by legislation. In their comments the industry stressed that standards for zero carbon buildings are intended to be set nationally through the building regulations and that Plan:MK should not include any additional requirements; a view that was also supported by the MKC Housing and Policy officer.

On the question of Allowable Solutions, the majority of representations made by members of the public would like to see allowable solutions monies be spent on the local renewable and energy infrastructure. Nearly all Parish Councils would prefer any monies be used in projects that result in CO₂ emissions reduction from existing housing stock, although one commented that allowable solutions are not desirable and that, globally offsetting schemes show little benefit. One agent commented that they would support the allowable solutions monies being used for wider purposes than just the existing housing stock.

There was a consensus across the large majority of respondents agreeing that Plan:MK should contain a locally specific strategic flood risk management policy, with a number also recognising the success of Milton Keynes’ existing drainage strategy and the use of multi-functional green infrastructure, and supporting its continuation. The Parks Trust
also noted the need for a policy framework considering the design, management and maintenance of strategic drainage systems and multi-functional green infrastructure, and also a need to recognise all relevant aspects of the Water Framework Directive.

Other respondents also recommended the need for policies relating to; urban creep, particularly in older established areas; alternative methods for dealing with foul water in low density/rural areas; and, the capture of water to facilitate its use in supporting water needs.

Overall Comments

What members of the public said:

- Milton Keynes, has to switch away from our 1960s type of car dependency and 1900s garden city level of development density to something more sustainable
- Smarter and more energy efficient dwellings plus renewable energy on their own are not sufficient to deal with the climate change issue. There is over-reliance on these two aspects
- There is no attempt in the Topic Paper to establish what quantity of CO₂ will be generated year-on-year
- There is no consideration of accessibility deficit due to excessive car dependency
- The Topic Paper does not give options and there is lack of relevant information that would help in decision making
- There is a need to address from which sectors CO₂ emission reductions will come from
- There is no mention of the MK SITS (Sustainable Integrated Transport Strategy) and no consideration of how to reduce CO₂ emissions from vehicles
- MK needs to tackle the problem of the existing housing stock through a programme of retrofitting every building with increased insulation and on-site renewable energy installations
- No mention is made of the 'Nottingham Declaration' and the 'Covenant of Mayors' both of which Milton Keynes has signed-up to.
- Several visions of the MK future must be presented
- There should be a policy for carbon sequestration in new build houses and in refurbished buildings. Natural materials that could be used include wood, straw, hemp, recycled cardboard and willow
- The Council should look at how to reduce carbon emissions in its own building stock

What Town and Parish Councils said:

One Parish Council felt there was a need to consider future building projects that embrace modern building techniques, that are resilient to climate change and maintain their life with low carbon deposit.

Another felt that sustainability thresholds for permitted development should be raised. Permitted development and home extensions could be allowed only when the existing building meets acceptable levels of carbon emission. MK is now an ageing city but that Plan:MK focuses mostly on new development.

What Ward Councillors said:

There should be some explanation as to where MKC stands on the Nottingham Declaration, signed by over 300 local authorities.
What the industry said (e.g. landowners, developers, agents...):

- Topic Papers are seemingly generally negatively worded and fail to promote renewable energy.
- The Topic Papers, as a key part of the emerging Local Plan evidence base are lacking in detail and fail to present the positive outcomes of renewable energy generation.
- Plan:MK should acknowledge that an increased amount of energy from low carbon sources is required if we are to meet the UK’s binding objectives.

**Question 1: On-site Renewable Energy**

- Should Plan:MK introduced specific requirements for on-site renewable energy in new housing and commercial developments?
- Should there be any thresholds that would trigger this requirement e.g. similar to Policy D4 thresholds of more than 5 dwellings or 1000 m² in cases of commercial developments?
- If setting a local on-site renewable energy requirement was a preferable way forward then what proportion of the energy requirement should be offset e.g.: 10%, 20% or higher? Should that include both regulated (included in the Building Regulations) and unregulated emissions (from electrical appliances and cooking)?
- Should Plan:MK include policies requiring no fossil fuel developments?

What members of the public said:

There was overwhelming support for on-site renewable energy in new housing and commercial developments. Most of the responses suggested solar panels as the most suitable form of on-site renewable energy source. Half of the respondents wanted to see all new buildings to be required to have on-site renewables and the rest did not expressed any preferences towards a specific threshold that would trigger the requirement for on-site renewables. No specific comments were made on “no fossil fuel” developments.

Comments were also made about orientation of the new buildings and their roofs to allow for maximum solar gain and general buildings’ design that would allow solar panels to be retrofitted when feasible. There was one comment suggesting that MKC could offer incentives such as business rate relief to support on-site renewables.

What Town and Parish Councils said:

All comments made by Town and Parish Councils were in support of the requirement for on-site renewable energy. However, the principle of achieving carbon neutrality by partially offsetting CO₂ emissions by renewable energy sources was considered undesirable by two Parish Councils. They called for a better definition of the offsetting, but also argued that renewable energy micro generation produces emissions and leads to higher levels of consumption in homes, thus increasing CO₂ emissions. There was no overall preference towards including regulated and unregulated emissions in the requirement for the energy offset from renewable energy sources. One Council supported policies requiring “no fossil fuel” developments.

What Ward Councillors said:
Two Councillors would like to see tested and tried energy saving and creation schemes to be part of MKC policy. They also commented that new developments be required to be constructed to high energy standards, something that is not currently apparent. The Lib Dem Group would support continuing with our local sustainability policies and updating them, because the inclusion of policies in government standards cannot be guaranteed or guaranteed to continue. Also, MK’s sustainability policies cover aspects that are important locally and are not in the proposed regulations. The Group also stressed that MK will wish to improve the standards further at the earliest opportunity. The Lib Dem Group would support a new policy expressing our aspirations covering all the aspects that are covered by Policy D4 of the Local Plan, and making them local policy with a proviso that the relevant aspects may be over-ridden by legislation. The Group also indicated that a mid-term update may be required to enhance standards as technology and cost change.

What Milton Keynes Council departments said:

MKDP agreed that on-site renewable energy and use of energy performance standards will assist with carbon issues. However a balance should be struck between the sustainable construction requirements and feasibility of the schemes.

The Housing team felt that Plan:MK should not introduce heightened sustainable construction standards over and above the Building Regulations as it would be contrary to the government’s zero carbon policy and NPPF guidance. Also, the requirement for higher sustainable construction standards would impact on a scheme’s viability. Future policies should promote an area wide approach to low or zero carbon development and renewable energy provision.

What the industry said (e.g. landowners, developers, agents...):

Four out of five representations made by the industry stressed that standards for carbon minimisation and energy measures are intended to be set nationally through the building regulations and that Local Planning Authorities should not set any additional requirements relating to the construction, layout and performance of new dwellings (other than those set out in the Building Regulations optional requirements). The comments also stressed that where standards in excess of the building regulations are required, the policy should include viability considerations.

One respondent agreed that subject to viability considerations, Policy D4 and associated supplementary guidance is sufficient in respect of on-site renewable energy.

Two respondents were against policies requiring no fossil fuel developments.

What national/statutory organisations said:

Natural England, while not directly referring to the issues of renewable energy and sustainable construction, stressed the importance of green infrastructure in providing urban cooling and adapting to climate change.

What local organisations/interest groups said:

Two comments were received from the local organisations. The Canal and River Trust put forward a proposal for use of waterways for heating and cooling of buildings (through heat exchange pumps). A local society would like to see the requirement for on-site renewable energy in new developments, and if that is not viable a financial contribution to MKC
carbon offset fund. The society also suggested 10% of the energy demand should be provided from renewable sources if both regulated and unregulated emissions were included, or 20% if only regulated emissions were to be accounted for. They considered that no fossil fuel developments were economically unviable, but incentives could be included to encourage developers to build a proportion of homes that are not reliant on fossil fuels.

**Question 2: Allowable Solutions**

- Could the allowable solutions money be used by the local authority for investment in local renewable (or low carbon) energy infrastructure projects and on projects that result in reductions in $\text{CO}_2$ emissions from existing housing stock?

**What members of the public said:**

All respondents agreed that the allowable solutions money could be used by the local authority for investment in carbon reduction projects. The majority of respondents supported funding the local renewable (or low carbon) energy infrastructure projects through the allowable solutions money. One of the consultees would not like to see the money be spent on large scale wind turbines.

One response was specific that the money should be spent on projects that result in reductions in $\text{CO}_2$ emissions from existing housing stock.

**What Town and Parish Councils said:**

One Parish Council believed that allowable solutions are not desirable. Evidence of efficacy of allowable solutions (carbon emissions off-set schemes) is not provided in the draft document and globally, off-setting schemes show little benefit. The consideration of carbon emissions to on-site only is that it can lead to increased off-site emission in the acquisition/production and transport of materials. The use of low-carbon technologies such as carbon-neutral lime-based construction materials should be considered in addition to reuse/recycling. Building design needs to be considered as part of the sustainability equation to ensure that longevity of buildings plays part in the overall reduction in $\text{CO}_2$ emissions. More comprehensive rules, with no off-setting, should be applied so that life-time carbon footprints are reduced overall.

Another Council said that allowable solutions should result in a kick start opportunity of incentivising projects that lead to reducing $\text{CO}_2$ emissions from existing stock.

While another Town Council would support allowable solutions money to be invested in the existing housing stock (regardless of tenure) so it leads to reducing fuel poverty.

**What Milton Keynes Council departments said:**

One team agreed that Plan:MK should ensure that allowable solutions money be used by the local authority for investment in local renewable (or low carbon) energy infrastructure projects and on projects that result in reductions in $\text{CO}_2$ emissions from existing housing stock. The RegenerationMK project would be an opportunity to do this.

**What the industry said (e.g. landowners, developers, agents...):**
A landowner in CMK supported the use of allowable solutions monies being used for investment in local renewable, low carbon or energy infrastructure projects in Milton Keynes provided this is done for wider purposes than just the existing housing stock.

A major housebuilder reserved comment until the Government makes a detailed announcement regarding allowable solutions. They however noted that the provision of new development in sustainable locations is key to the reduction of energy consumption, as a large amount of energy use relates to transport.

**What local organisations/interest groups said:**

A local society would prefer the allowable solutions monies be used in project that result in CO\(_2\) emissions reduction from existing housing stock not in projects that create new local infrastructure projects. There is little point in new projects whilst failing to address the problems with existing housing stock.

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**Question 3: Renewable Energy**

- Should Plan:MK support all types of renewable energy schemes provided they are acceptable in terms of their environmental, economic and social impacts?
- How could Plan:MK support local community energy schemes?
- Could Plan:MK require more renewable energy schemes on Council-owned land/buildings?

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**What members of the public said:**

All comments received supported the principle of renewable energy schemes provided they are acceptable in terms of their environmental, economic and social impacts.

Four out of five respondents would like to see Plan:MK supporting local community energy schemes. This should be done by MKC giving advice e.g. on feasibility of the schemes and having consultations with local groups.

Two out of five respondents expressed concerns about wind turbines and their impact on natural environment, while one respondent expressed support for wind and solar farms.

One respondent also made a point about high full-cycle carbon emissions of wind turbines (energy and materials required to manufacture a wind turbine resulting in CO\(_2\) emissions).

One respondent emphasised that particular support should be given to renewable energy schemes that can be rolled out extensively rather than just showcase schemes.

**What Town and Parish Councils said:**

One rural Parish Council supported solar energy installations especially those on house roofs. Industrial solar installations were also supported providing they are sited in locations where there is a minimum impact on dwellings. In terms of wind energy developments the Parish Council would urge MKC to establish a planning policy creating a relationship between the height of the turbine and its distance from dwellings while recognising government guidance which does not permit a simple distance barrier. The Parish Council also drew attention to two legal decisions that could influence the future policy.
Another Council supported all types of renewable energy schemes provided they are acceptable in terms of their environmental, economic and social impacts. In terms of supporting local community energy schemes they felt Plan:MK should incentivise and support the inception of “Energy Watch”, a programme engaging the community in collective purchasing - not just electricity or gas supplies, but also wall insulation, window replacements etc. This could also include improving knowledge and skills of energy management through leaflets and discussions. The Parish Council would also support more renewable energy schemes on Council owned land/buildings provided they are aesthetically and environmentally acceptable.

There was also support for all forms of renewable energy schemes from another Parish Council subject to their acceptability which should be evidence based and new evidence, as it becomes available, should be taken into consideration in planning applications. Plan:MK needs to be sufficiently flexible to accommodate new technologies such as multiple-source, micro-generation and storage with links to the national grid them. In terms of supporting local community energy schemes Plan:MK should offer some assistance to communities with organisation, business skill support and fund-seeking/management. These could be delivered by existing small business advisory services. MKC should also lead by example and promote more renewable energy installations on its own land/buildings than that it normally requires in non-public buildings.

What Milton Keynes Council departments said:

One MKC team stated that there needs to be a clearer distinction about schemes that will provide energy to a particular estate or group of houses in Milton Keynes, and schemes that provide energy that is fed into the National Grid. For example, if a new Waste Recovery Park-type development was built it should be clearly shown that this energy would provide power directly to homes in Milton Keynes.

What the industry said (e.g. landowners, developers, agents...):

- All schemes for renewable energy should be supported, unless there are significant effects which otherwise outweigh the significant benefits of renewable energy generation.
- Restricting the types of renewable energy schemes to be offered support in Plan:MK would conflict with the National Planning Policy Framework
- The Local Plan and Topic Papers should distinguish between small, medium and large turbines as they all have different potential impacts and requirements
- Plan:MK should be flexible enough to allow consideration of all types of renewable energy schemes but this must be weighed against the financial efficiency of progressing less tried and tested schemes whose cost may be high. Each application must be determined on its own merits
- The best way for the community to contribute to energy generation from renewable or low carbon sources is to support all types of schemes and to allow the most appropriate technology to be located in the most appropriate location.
- Community financial contributions, such as those advocated in the policy context of the Topic Paper are voluntary and cannot be lawfully required under present CIL Regulations
- Policies that will help identify and assess suitable sites for renewable energy schemes are welcomed but should not be so stringent as to be prohibitive.
- The Council should not be exempt from contributing to the renewable energy generation
11 Climate Change and Sustainability

What local organisations/interest groups said:

A local society stated that all renewable energy schemes should be considered on a case by case basis with full community involvement including on Council owned assets and that there should be a specific policy for local community energy schemes that encourages communities to get involved with energy consumption and production.

Question 4: Flood and Water Management

- Do you agree that a locally specific strategic flood risk management policy should be developed as part of Plan:MK?
- Are there any elements outlined within the section that you disagree with or feel could be dealt with differently within Plan:MK?
- Are there any additional elements that you feel have not been included and could be covered by a strategic flood risk management policy for Milton Keynes?

What members of the public said:

- Agree with and support the development of a locally specific flood risk management policy
- Flood risk should be assessed for a future period of 50 + years (minimum lifetime of a home).
- Insurance companies should be consulted, they determine premiums and whether to insure a dwelling based on their own flood risk criteria; no homes should be built that could become unsaleable in the future due to flood risk.
- Balancing lake principle works well; continue this principle and draw water from them into buffer water towers to gravity feed grey water into homes. Similarly utilise large underground containers to store run-off from roofs.
- Look at alternative methods for dealing with foul water in low density/rural areas (e.g. reed beds), rather than pumping to treatment works.

What MKC departments said:

Agree that a locally specific strategic flood risk management policy should be developed.

What Town and Parish Councils said:

- A locally specific strategic flood risk management policy should be considered, but is it a need to have or a nice to have, in these times of austerity?
- With climate change likely to also bring drought, policies relating to capturing water and facilitating it being used to support water needs should be adopted. New developments should be encouraged to embrace grey water technologies.
- Newport Pagnell flagged as being at risk, particularly if any development were proposed near to it.
- Agree a locally specific strategic flood risk management policy should be developed; Detailed plan must however take account of the fact that the efficacy of methods to reduce flooding can be reduced and the life-span of solutions are always shorter than anticipated.
- Prohibition of development on flood plain is not contained in plan; a significant omission.
• Water runoff is problematic in older established areas because of impacts of urban creep (e.g. paving over free-draining gardens). Simple measures at micro levels should be considered.

What the industry said (e.g. landowners, developers, agents...):

• Locally specific strategic flood risk management policy should be a key component of the long term vision contained within Plan:MK so as to continue the success of MK’s exemplar drainage strategy. Disregarding it would be irresponsible and would have major effects on attracting new development.
• Generally support the Council’s approach to flood and water management.
• A locally specific policy may be justified given the strategic drainage philosophy of the City, providing the requirements of the policy are appropriate and it does not compromise the viability of the development.

What Ward Councillors said:

MKC’s responsibilities under the Flood and Water Management Act (2010) should be strengthened by being reflected within Plan:MK.

What other National/Statutory Organisations said:

Anglian Water support the MKC approach of producing an updated Water Cycle Study as further background evidence for continued development of Plan:MK.

What other Local Organisations/Interest Groups said:

The Parks Trust commented that:

• The Topic Paper should recognise the important role played by the Parks Trust in managing floodplains in linear parks and their specific maintenance responsibilities of a number of SuDS systems around the City.
• The Parks Trust is best placed to maintain SuDS schemes in new developments which combine water management with amenity, landscape and ecological objectives.
• Principle of multifunctional green infrastructure is entirely appropriate and open space containing surface water management features can be successful. Careful management is, however, needed to avoid water storage functions dominating parkland and reducing/compromising land for recreation and amenity (as has happened in some instances in the EEA). A policy framework which ensures adequate space for attenuation features and space for recreation/amenity features is needed.
• Support the consideration of water quality management.
• Plan:MK must also recognise other aspects of the Water Framework Directive relating to overall condition of rivers, alongside managing water quantity and quality, incorporating degree of artificiality/modification vs. naturalness; habitat value; and extent of invasive and non-native species. These will have a bearing on management and maintenance of watercourses and drainage systems as development occurs.
• Policy must incorporate wider issues contained within the Great Ouse Catchment Flood Management Plan. Local policy must continue to ensure development in MK does not increase risk of flooding, or affect water quality, further downstream in the Great Ouse catchment.
It must be made clear that economic viability cannot be used by developers to negate their responsibilities to deliver the requirements of a locally specific strategic flood risk management policy.

Making the most appropriate use and disposal of water needs to be built into the design of any development. The Water Cycle Study should have been done at the same time as these Topic Papers to inform Plan:MK, not act as a separate entity.

Agree with the need for a locally specific strategic flood risk management policy and highlighted high levels of local flood risk from the Whaddon Brook in Calverton and Lower Weald.
12 Duty to Cooperate

Summary

This Topic Paper covered general issues relating to the Duty to Cooperate, and how the duty applies to specific areas such as housing, economy, infrastructure and culture. 67 responses were received from 39 individuals and organisations.

The responses varied between the different types of organisation although were very consistent within particular groups. There was unanimous support for Plan:MK successfully fulfilling the Duty to Cooperate but most comments were critical of progress to date.

Responses either referred to specific procedures the council should follow to help meet the requirements of the duty, specific bodies or groups that should be engaged or specific sites where fulfilling the duty is paramount to justifying their selection (or rejection).

Overall Comments

What Town and Parish Councils said:

Parish and Town Councils (including those in adjacent authorities) emphasised the need for the duty to extend to them at the earliest possible stage, potentially through existing Parish Forums or Association of Local Councils. Some suggested more drop-in events in their area would be a good mechanism for doing this. Others simply requested that the relevant authorities (specifically, Aylesbury Vale for Whaddon, Central Bedfordshire for various parishes and South Northants for Old Stratford) be engaged on behalf of the parishes. One Parish Council was concerned that development in neighbouring areas should still contribute to infrastructure and services within the Borough. Another was concerned that the Council’s approach to Duty to Cooperate in respect of culture and heritage should take more account of ethnic diversity.

What Ward Councillors said:

The only response from Ward Councillors emphasised the need for coordination rather than just meeting the requirements of the duty, particularly in respect of countryside and green space that extend across boundaries.

What Milton Keynes Council departments said:

One team at MKC pointed out it would be difficult to achieve agreement between authorities on how the plan will be delivered, as ultimately it will be the market that delivers the plan. However they indicated that the approach of initial officer agreement and sharing land availability work with neighbouring authorities was the right one. They also advocated the use of an MK-specific Memorandum of Understanding as we are already signatories to one with Luton. They also agreed that maintaining the balance between job growth and housing is a vital issue for the Duty to Cooperate, as it has been an important feature in the success of Milton Keynes.

What neighbouring and other local authorities said:
West Northamptonshire indicated that they were closely involved with Milton Keynes through SEMLEP (particularly the Planners Forum). They said that the key issues for the Duty to Cooperate with them were housing growth, employment and economic growth, biodiversity/green infrastructure and town centres/retail.

Bedford Borough said that one issue the Topic Paper did not cover was the ongoing discussions regarding the reassessment of Housing Market Area boundaries.

Wycombe District highlighted the recent housing market work undertaken by ORS on behalf of the Buckinghamshire authorities. They flagged up the fact that if their combined objectively assessed need could not be met within the HMA, then they would seek discussion with MK regarding the possibility of accommodating unmet need here.

Aylesbury Vale said that we should provide more clarity on how MK proposes to work with other authorities. They also consider that it would be helpful to understand the timelines for Plan:MK and how that will relate to other authorities. They also suggest we should not specifically refer to Salden Chase as there are other sites in the area being promoted (NB. the Salden Chase proposals have since been formally submitted as an application). They raise the following issues as requiring attention under the Duty to Cooperate:

- the ongoing role of MK as a centre that has a catchment into Aylesbury Vale,
- employment growth with specific reference to commuting,
- avoiding coalescence with smaller villages and hamlets in Aylesbury Vale,
- jointly planning for infrastructure such as dualling the A421 and East-West Rail,
- sharing gypsy and travellers needs assessments,
- ensuring that development in either district does not increase flood risk in either area (specifically on the Great Ouse and Grand Union Canal),
- minerals and waste development, and
- Natural Environment Partnership plans and policies.

Northampton Borough Council said that the West Northamptonshire authorities should be specifically mentioned with a representative from the three constituent authorities involved with any officer groups. Further details on an actual engagement strategy is required, rather than just repeating the requirements of legislation.

What the industry said (e.g. landowners, developers, agents…):

The development industry respondents pointed to emerging case-law that provided guidance as to what constitutes the Duty to Cooperate. This included breaking the duty down into an assessment of the process undertaken, whether engagement has been constructive, active, on-going, collaborative and diligent and whether engagement has been of mutual benefit. Most suggested that MKC had not done enough to fulfil the duty to date.

The contribution authorities in the south-east may need to make to London’s housing requirement was also a common response amongst the development industry, with Savills Residential Research suggesting this would be in the order of 3,330 dwellings per annum for Aylesbury Vale and Milton Keynes combined.

Several groups in the development industry said that we should be focusing on the involvement of businesses when preparing Plan:MK. Some phrased this in terms of taking account of the strategic objectives of the LEP, others pointed to specific companies such as Red Bull, Santander, John Lewis, Amazon, Network Rail etc.
Developers/landowners also said that the Duty to Cooperate was important for the delivery of their sites in the south-west and south-east corners of the Borough (i.e. with Aylesbury Vale and Central Bedfordshire respectively).

Other developers said it was critical that all relevant authorities sign-up to a Memorandum of Understanding rather than individual solutions for each individual neighbour. Similarly, others said that respective SHMAs need to be consistent in terms of methodology, assumptions and time scales.

The consortium for south-east Milton Keynes said that to help fulfil the duty, MKC should review the extensive evidence that already exists regarding cross-boundary growth, as much of it is still relevant. They also say that both MKC and Central Beds should have already been actively engaged on this issue and have jointly prepared a development framework.

One developer said we should ensure all accounts relating to the Duty to Cooperate are publicised so it is made clear to the inspector that it has been satisfied.

**What national/statutory organisations said:**

The Highways Agency supported the ongoing use of SEMLEP’s Infrastructure Investment Plan to identify and agree local and strategic infrastructure priorities.

Natural England said that consideration should be given to cross boundary working under the Duty to generate a landscape-scale GI Strategy.

**What local organisations/interest groups said:**

One local society said there was presently a lack of work and agreement with Central Bedfordshire and that MKC should not unilaterally attempt to bring forward development without engagement. However they also suggested that whilst comprehensive engagement was required with AVDC on cross-border issues, Central Bedfordshire is essentially in competition with Milton Keynes for employment so engagement should be restricted to housing and transport issues.

**Question 1: Housing**

- Are there any other issues relating to housing which you think we should be engaging with other public bodies on? If so, please give details?
- Do you have any thoughts on how the Council is currently considering housing issues with other Public Bodies?

All comments covered above.

**Question 2: The Economy and Jobs Growth**

- Are there any other issues relating to the economy which you think we should be engaging with other public bodies on? If so, please give details?
- Do you have any thoughts on how the Council is currently considering economic issues with other Public Bodies?
Question 3: Infrastructure

- Do you have any views on how the Council is currently approaching the provision of strategic infrastructure with public bodies?
- Do you think there are any gaps in the discussions? If so where are they and who should we be engaging with?

All comments covered above.

Question 4: Culture and Tourism

- Are there any other issues relating to culture and tourism that you believe the Council should be engaging with other Local Authorities or Public Bodies on?
- If so, what are they and why are they strategically important?

All comments covered above.

Question 5: Duty to Cooperate

- Do you have any general comments on how the Council is addressing the Duty to Co-operate and any gaps that may remain?

All comments covered above.
Summary

This Topic Paper covered issues from across all the other Topic Papers with a focus on the particular strategic and spatial issues that will shape the fundamental vision of Plan:MK. 602 responses were received from 194 individuals and organisations.

Some comments were received on the consultation in general, with several people stating that the Topic Papers weren’t as readable and accessible as they might have been. Many also questioned why the Core Strategy was being rewritten so soon after being completed. In terms of the format of the vision, many said it should be short and succinct, and build on elements of previous visions.

Making the most of the economic potential of Milton Keynes was often emphasised, and the need for the Vision to deliver sustained economic growth. The overall need for further development was questioned however by some respondents, who felt that there should be further discussion over whether it was desirable to commit to further growth at this time.

There was however a lot of discussion of what makes Milton Keynes special and what therefore needs to be carried through into a future vision, and maintained for the future. It was recognised that we are now working in a very different political environment to the original planners of Milton Keynes.

Several comments proposed that the Plan period should extend beyond 2031 and a number of replies suggested the housebuilding was too low while others said it was too high. The need to resolve funding for infrastructure was highlighted. The directions of growth need full consultation and a large number of respondents expressed concern about further development around Woburn Sands, Wavendon and the Brickhills.

Some suggested that one large site for an urban extension is preferable to several smaller sites, while others argued for more dispersal with several smaller sites. Land for employment should be kept and not be displaced while the counter argument proposed re-designating them for housing.

A standalone settlement was opposed by some, while others supported with conditions that all other options should be assessed. Joint working (at all levels of local government) should be formalised to produce and test options.

Respondents were generally split on the principle of reallocating employment land although most acknowledged the need for further evidence before judgements could be made. In terms of large new employment sites, there was some support provided they were large enough to generate public transport investment and were not low-skill or low job-density.

The linear park system received near unanimous support, as did the principle of extending it into new developments. This was particularly true where respondents highlighted specific environmental constraints such as landscape to the west and flooding to the north.
Grid roads were generally supported in the consultation although there were several respondents that suggested they were too expensive and did not do enough to encourage public transport. In terms of the current retail hierarchy, sensitivity to the market and to the impact of new large centres was urged by respondents although there was little outright support or objection to the current hierarchy.

Respondents were supportive of reserve sites but generally felt that in new developments there should be fewer but larger reserve sites in order to potentially support more uses and minimise uncertainty for neighbouring residents.

Overall Comments

What members of the public said:

Comments from members of the public included the following points:

- Many respondents supported the response submitted by their local Town or Parish Council. As part of this, several also thanked the Council for the work being done on the Plan and the opportunity to comment.
- Surprised that the Core Strategy is being reviewed so soon after it was adopted. Far too early to look to review the Core Strategy; Plan:MK is a waste of resources and undermines the hard work that communities have put into preparing Neighbourhood Plans.
- The Topic Papers are too long and wordy, and many residents will not feel able to engage. One respondent suggested the use of infographics could have made the content more accessible.
- What are we being consulted about? There is no information; matters have already been decided; there are no alternative ideas.
- Raised that residents of Central Bedfordshire should have been made aware of the consultation as many of the issues are likely to have cross-boundary impacts.
- Some respondents expressed a concern that decisions are made are not in accordance with existing policies and this makes people reluctant to get involved in plan-making.
- Believe that that the Topic Papers should have addressed the advanced technologies that will help shape our thinking on the future and a vision for MK.
- Concern that the Minerals Plan is being dealt with outside of the Plan:MK process.
- Support the Western Expansion Area development - it looks like everything has been considered, including infrastructure requirements.

What Ward Councillors said:

One Councillor objected to the wording and implication of many questions as being leading. For example, Question 15 in the Way Forward topic paper includes the qualifying remark “at any cost”, which is not included in respect of other questions.

What Town and Parish Councils said:

One Council wished to see MKC refuse applications where it is obvious that some sites are not suitable for development.
A rural Parish Council raised their concern that the size of the Topic Papers made them slow to download, and that they were quite cumbersome to read and comment on. However, they felt that the use of the portal was most effective, as were the drop in sessions (although held a little late in the consultation period).

The Topic Papers concentrate on new development and expansion with insufficient focus on maintenance/care, renewal, improvement or enhancement, felt one Council. They also said that the insufficient background evidence is available, with references that are incomplete and inconsistent, and that the nature of the questions can be difficult to respond to.

What the industry said (e.g. landowners, developers, agents...):

Disappointed that timetable for Plan:MK is so far behind what the Core Strategy Inspector’s Report recommended.

What local organisations/interest groups said:

A local forum believed the Topic Papers were too detailed for this stage in the process. Another believed that MKC has failed to proactively reach and engage in a local community that has previously been involved in the planning process.

**Question 1: Format of the Vision**

- What format do you think the Vision for Plan:MK should take?

What members of the public said:

One respondent felt that a short bullet point format does not do justice to the importance of the issues.

It was also stated that the vision should be uplifting but anchored in reality.

What Ward Councillors said:

One Councillor stated that the Plan:MK vision and strategy should be the top of the strategic hierarchy. He also felt it should be a short statement, no more than two sides, and could be supplemented by video or other media. Another felt that the Plan must contain a clear vision, as bullet points, which could be a succinct, refined version of the Core Strategy vision.

One Councillor believed that the new vision should be a masterplan, similar to that put in place when MK was first conceived.

What Milton Keynes Council departments said:

One team considered the Vision should be short and memorable, perhaps with bullet points, and have some recognition of past successes.

What the industry said (e.g. landowners, developers, agents...):
Many developers said that the Vision should be a concise statement of intent, with bullet points of aims and objectives. Another considered a short statement with diagrams and infographics would be most suitable, and it should be incorporated into the Council’s Community Strategy.

A group of housebuilders believed that the Vision needs to take account of all three elements of sustainability, with the political commitment to deliver a new phase of growth and expansion, rather than letting the town stagnate. They also felt the vision should be a short, succinct document, that can be easily referred to when making key decisions and when considering the more detailed policies that will follow.

**What local organisations/interest groups said:**

A residents association believed the vision should be a statement about the role and purpose of the Borough, and the physical extent of the city 25 years from now, and must give certainty for communities, rather than allowing short term decisions which are made in ignorance of strategic purpose or consequence.

One local citizen’s organisation felt that the Topic Paper should have tested whether the existing vision has been achieved.

Another local group felt the vision should be short and provide a clear picture of where the Borough will be in 25 years, being aspirational and covering the things that define the nature of MK and the achievements of the last 40 years. Clear aspirations in the vision will allow the strategies for delivery to be written.

**Question 2: Content of the Vision**

- Do you think the Plan:MK Vision should be based on a Vision from the past?
- If so, which Vision should form the starting point?
- And what updates or additions would you propose to make it fit for purpose moving forward?
- Are there any principles or elements from the existing Visions that you think should be carried through to the Plan:MK Vision?
- Alternatively, do you think the Plan:MK Vision should start afresh?
- What should a new Vision contain?
- What are the key principles or goals that future development in the Borough should be aiming to achieve?

**What members of the public said:**

Comments from members of the public included the following:

- The vision should ensure that no further city streets, as they are totally contrary to the rest of the city.
- The vision to 2031 should also state what is the broad vision for beyond that, for example, whether growth will continue, or if the 2031 level would be the limit.
- The vision must make the maintenance of the unique urban environment and its green infrastructure explicit.
Impressed by what the original vision gave in terms of landscaping and planting, and that should be continued. However it may be time to move away from car-centric development, and would support development that allowed improved public transport provision.

- Cities the size of MK are already big enough, and the creation of a number of small new towns could have advantages
- Resilience needs to be encouraged, meeting an increased proportion of essential needs locally, including small scale energy production and horticulture projects, self-build schemes, and small, local companies instead of large corporate organisations.
- The vision should look to deliver development that gives priority to people, not the car, and mixes commercial buildings with residential; based on the principles of Poundbury.
- The original core aims are worth retaining, but our requirements now are very different.
- There will be elements of many previous visions that should be drawn on and updated where appropriate, for example, involving residents in the running of the city and its future development, and also the upbeat style of the 2004-2034 Sustainable Community Strategy. The respondent also provided some useful comments including about the need to celebrate the positive aspects of our multi-cultural community (including the care that needs to be taken in how groups are referred to) and how we are working in a very different political environment to the original planners of Milton Keynes.
- Existing undeveloped areas should be developed first before extending beyond the original designated area, and the grid square pattern of development should be used for future areas. But there needs to be an understanding of the overall strategy and what the ultimate size of the Borough should be.
- The heritage of the Borough needs to be an important component of the Plan, and protected and promoted for all residents and visitors.
- One respondent provided a comprehensive response about what makes MK a great place to live, what needs to be preserved, and what needs to be improved. These points were summarised under the headings of prosperity, quality urban architecture, transport, services, the green environment, tourism, young citizens, shopping and collaborations. The respondent underlined the importance of a vision for MK that creates excitement and encourages people to engage, and stressed that while a quality environment doesn’t come cheap, it is worth fighting and paying for.

**What Town and Parish Councils said:**

Several Councils expressed their concerns that the approach of Plan:MK proposes to re-write the Core Strategy and all of the work that went into it, and especially when it was finalised so recently. Some went on to say that Plan:MK should extend the Core Strategy policies and initiate a debate on the optimum long term vision, size and scale for Milton Keynes. Infinite outward growth is not a realistic goal; at some point increased density within existing boundaries will need to be considered. It was also felt that overwriting the Core Strategy would undermine the time and effort put into preparing Neighbourhood Plans.

It was considered that the Core Strategy vision, aims and policies should not be deviated from unless they will not hold true until 2031. They also said that the current planned developments in the Core Strategy should be completed and progress made on the East-West Rail before determining if further growth is necessary or how it should take place.
Another Parish Council believed that the original guiding principles should be carried forward for Plan:MK. It was stated elsewhere that the principle of adequate open space in future development should be retained and extended into new areas as essential infrastructure.

For one Parish Council, their key areas of concern included; the possibility of growth east of the M1; improving rural broadband speeds; preserving the ‘open countryside’ and ‘rural village’ status of Moulsoe; increased traffic congestion and speeding; and the impact of development on existing communities, infrastructure and facilities. They also said that growth of MK mustn’t spoil its uniqueness by making it too much bigger. Separately, they also said that MK is already a regional centre but warned that infrastructure links are likely to be overloaded by further expansion.

One Council wanted to see the importance of CMK recognised in Plan:MK, and considered that the vision needed to include the preservation of the classic CMK infrastructure; densification, not dispersal; and transport, travel and parking. They also have priorities for implementation (a new university, an international congress facility, additional arts and community facilities, and a covered market for small and specialist traders). They considered that a Topic Paper covering CMK specifically should be prepared.

**What Ward Councillors said:**

The two MPs for Milton Keynes questioned the need to plan for further growth beyond that in the Core Strategy, and felt that a number of regional and national factors should be considered first. These included the impact of East-West Rail, HS2 and the additional capacity that will be created on the West Coast Mainline; the impact of growth in the wider region (for example at Bicester, which will have good transport links with MK); the type and scale of future economic development as business growth must underpin housing growth; how development of further, higher and tertiary education is delivered which could have different impacts on land use and housing; and the implications of technological innovation. They considered that in any event, infrastructure must be delivered before expansion, and before any additional housing is committed, that enhancements to local infrastructure and services must be carried out. They said that physical expansion of the city must be complimentary to the original principles, but restated that it is not necessary at this stage to commit to further expansion.

A group of Councillors believed that all options (“inwards, outwards and upwards”) will be needed to meet the current crisis, but they would be reluctant to support development on land designated as greenspace except as part of a neighbourhood plan.

Another Councillor believed that Plan:MK should include an assessment of the spatial elements that have made MK so successful, so they can be retained and expanded. He also had some thoughts on what might flow from the Vision, including:

- consistently good design and architecture
- leading edge sustainability
- exemplary minimum space standards
- choice of home styles, from traditional to ultra-modern
- homes with ‘work from home’ facilities
- mix of home sizes and price ranges
- examples of ‘big projects’ we believe MK should deliver over the coming decade
hotel developments, to help become a world class city for leisure, retail, sport and culture.

It was considered by one Councillor that the existing Core Strategy vision should be retained, un-amended, as it has full support, is comprehensive and aspirational, and is sufficiently up to date.

Two Councillors discussed that the Vision should highlight the ambition for MK’s future place in the region and wider, promote the distinctive urban/rural mix, stress economic and cultural strength; and encourage the ability to generate grass roots solutions. They felt some strategic issues need to be debated further, including mapping the hierarchies of settlements, retail centres, open spaces etc; looking beyond 2031; what are the benefits and risks of continuing to grow beyond 250,000 residents; are we making the most of the urban/rural identity; is MK continuing to develop in a distinctive way. They also supported working in the context of SEMLEP, and MK finding an appropriate regional role.

A group of Councillors who make up the Corporate Affairs and Performance Select Committee discussed the Plan:MK Topic Papers are their meeting in November 2014 and made the following points:

- A target for house building in the rural areas should not be a maximum
- We should consider all opportunities for the city to grow, and choices for future generations must not be restricted. Lessons and visions from previous plans should be borne in mind.
- Key decision dates in the process should be communicated more clearly.
- Independent shops run by young people should be encouraged in local centres
- Cross-party consensus must be continued
- Important for the public to be engaged, and particular effort should be made to engage those with sensory or mobility access needs, and those who tended to invest in small-scale businesses.

They resolved that the cross-party Cabinet Advisory Group should consider the following suggestions:

- Revise the vision proactively within the context of established policies
- Agree 110 houses per annum in rural areas but do not allow this to become a maximum
- Provide regeneration in addition to planned supply
- Support an examination, without prejudice as to outcome, of the possibility of a standalone settlement
- Support larger, more innovative employment areas
- Preserve our current open space and introduce similar standards into new developments
- Extend the grid road and Redway systems
- Promote larger retail stores in local centres.

What Milton Keynes Council departments said:

One team who responded to this question noted that the Vision should recognise past successes, that it would be wrong to discard all previous visions. But it should acknowledge that MK has undergone large scale changes since the original plan so a new, holistic vision
for the future will be needed, that is inclusive and inspiring. The Vision should recognise that a balance between growth and regeneration is needed, not just focussing on new areas, and should revolve around creation of a truly sustainable city.

What neighbouring and other local authorities said:

The West Northamptonshire Joint Planning Unit support a continuation of the concentration strategy based on a settlement hierarchy focusing on the city, which encourages the redevelopment of sites and buildings within the existing urban area, to promote sustainable modes of transport while still allowing for sustainable extensions to the urban area.

What the industry said (e.g. landowners, developers, agents...):

One landowner/developer stated that Plan:MK must ensure that the economic potential of the city can be realised, providing a fresh vision to guide the next stage of the city’s economic growth. They consider that the residual stock of vacant employment sites does not match the needs of the economy, particularly strategic employment development, so some existing employment allocations should be made available for alternative uses and a range of new allocations put in place. These allocations should reflect the need for distribution and logistic uses, and could be most efficiently delivered through the allocation of a large strategic employment site like the site east of the M1 that the developer is promoting.

They also considered that a new vision is needed, not a re-working of an older vision. The original vision has reached the end of its intended lifespan, and the Core Strategy vision lacks an impetus towards delivering economic growth and development. The new Vision needs to deliver a bold and flexible framework that clearly signals that MK is ‘open for business’ and plans proactively to meet development needs. It needs to follow through into Plan:MK policies which seek to maximise the economic potential and competitiveness of MK, through a range of employment land allocations that are flexible and responsive to business needs.

Another local landowner/developer believe the vision should look beyond the proposed end date of 2031, and should look at the land that may be available over this period for development. The landowner highlighted the advantages of their site.

A consortium of housebuilders believe that the change in economic context means that MK should re-establish its position as the primary economic engine in the region and plan for increased levels of economic and housing growth. They also said that the lack of progress and supporting evidence base demonstrates a disregard for the timetable for Plan:MK that was set out in the Core Strategy, and they express concerns for the potential implications this might have for the local economy. They state that because of the record of slow delivery of local plans, the end-date of Plan:MK should instead be 2036 as there is a risk it may not be adopted until 2021. Further, they considered that a key part of the existing vision that needs to be updated is regarding the strategy for movement and density, in order to define new key principles to guide the city into the future.

Some local landowners stated that the Council must create a clear vision for Milton Keynes which seeks to meet the objectively assessed needs of the wider Housing Market Area (which they consider to be higher than that in our Strategic Housing Market Assessment), in sustainable locations, working closely with adjoining authorities, public bodies and stakeholders. One put forward their site in Hanslope as a sustainable location for development, supporting the viability of a smaller settlement and providing both market
and affordable housing. Another stated that in some cases, development could be on land that crosses into another authority’s administrative area. Taking this further, another developer suggested preparing a joint plan with AVDC in particular.

A landowner in CMK said that the Plan:MK vision should draw on that in the Core Strategy, especially in terms of maintaining and enhancing CMK as a regional destination, and that retail and leisure development should be focussed on the primary shopping area. They also consider that the new vision should provide sufficient flexibility to foster sustainable economic growth. Another noted the importance of retail as a major employer in the Borough, and that retailing should be addressed in the vision for MK to ensure it remains a priority, and reflects the importance of CMK as a regional centre.

Two local landowners believed the additional allocation of housing land across Milton Keynes and surrounding settlements, including their sites, would meet an expanding population and economic growth. Another emphasised the role of rural settlements in meeting future development needs, while a further landowner also considered that sustainable, appropriate levels of growth should be allocated to a range of settlements in order to support existing services, and to provide a range of development opportunities to deliver both affordable and market housing.

One local developer felt that the original six principles were still relevant today, but should be supplemented by vii) to promote efficient, effective and sustainable use of land and viii) to ensure that Plan:MK is based on a successful business model to retain and attract inward investment to support the growth of the City and the Borough.

One developer emphasised the need for a positive, pro-active vision for economic development, backed by an effective portfolio of sites, and linked this with the opportunities of the International Sporting City. It was considered the vision needed to look forward for the next 40 years, over a longer period than proposed. This view was shared by another landowner who suggested that Hanslope could form a good site for a satellite, small-scale Garden City. They both also consider that future development should build on the strengths of the Borough, including its location, strong and diverse economy, and quality of life.

Alongside discussing the need for the plan to include a varied portfolio of housing and employment sites, two landowner/developers questioned the future role of Milton Keynes, and whether, as we reach the completion of the original plan for the city, there is an intention to remake and reinvest, to improve and enhance the place, or to continue growing, or to spawn other towns to form part of a cluster.

A national housebuilder believed that the vision for Plan:MK should take account of the Core Strategy vision, plus more recent Council and Government policies and objectives, and the SEMLEP agenda. It should also set the ambition for how MKC will sustainably provide for housing and economic growth in the future.

One local agent stressed that the vision should support a strong urban focus with a significant proportion of development directed to the urban edge of the city.

What local organisations/interest groups said:

A local Neighbourhood Plan working group were also disappointed that the issues covered by the Core Strategy are being reviewed so soon. They consider that MK needs time to assimilate all the changes so far, and allow the plans in the Core Strategy to be completed.
Further they felt that the Council has missed the point of planning for the future of their village, and raised concerns about the issues facing their area that Plan:MK will need to address.

A local society believed the existing Core Strategy vision should just be rolled forward rather than being re-written.

A resident’s association wished to see a longer term vision, based on the Borough’s historic geography and its potential for supporting sustainable development. The original guiding principles provide a good starting place.

The Parks Trust wanted the vision to incorporate the essential role of the open space network and the many benefits it brings. They state that policies for future development should include green infrastructure as essential, including provision that at least meets the proportion that currently exists, and that allow for improvements and sustainable maintenance.

A community organisation wished to see a vision that meant all future developments help to create successful and well-supported communities, so that people can achieve a good quality of life. This could be achieved through high quality affordable homes; that make people proud of their area and that they can afford to maintain; that are energy efficient and make use of modern technologies; that includes truly affordable rental properties. The plan also needs to take account of the ageing population, ensure that there are well thought-through quality spaces and buildings where communities can come together and in some cases take part in cultural activities, and that there is funding available to support the voluntary and community sector.

One local heritage organisation stressed the importance of the grid roads for ease of movement and path-finding, and wished to see the vision allow for their extension into new areas and for existing grid roads to be widened where they are only single carriageway. They also raised the potential to designate MK as a world heritage site which would afford protection to what is important here.

A local forum raised a series of questions that they consider should be posed, including; what is to be the ultimate population of the Borough and the area that could reasonably be considered part of ‘Greater MK’; how should that capacity be limited; what will be the method of allocating land (e.g. edge creep, new settlements); where and what should the boundary be; do we get to the stage of say ‘enough is enough’ to growth; and how do we ensure we have necessary resources to deliver the vision?

**Question 3: Land Requirements**

- Do you have any views on the total level of land that will be need to be provided to meet housing need in the Borough up to 2031?

What members of the public said:

Comments from members of the public included:
50,500 homes suggested to tackle housing crisis. House building not keeping pace with population led to property bubble and MK is no longer affordable for much if its young people. ‘Presumption in favour of sustainable infill’ to encourage more, with windfall development promoted by a positive policy statement.

The Plan period should look beyond 2031.

Current plans will overwhelm the road and infrastructure system and affect the quality of life of local residents. There are many other areas in the UK where additional housing and employment are needed. More development is not needed here.

The need for further growth in MK should not be seen as a given, and it may be better to place more emphasis on keeping to a manageable size that doesn’t lose the fundamental character of MK. The central government pressures to grow should be challenged.

The existing boundaries of MK should remain

It was also raised that further expansion would overwhelm the already overstretched infrastructure, traffic and green environment.

Expressed concern over any suggestion that Woburn Sands and Wavendon should have any further development, and also questioned that there is any need for further development beyond that which is already planned through the Core Strategy. Also felt that existing planned growth at the SLA would unacceptably increase traffic.

To make public transport work will require more than just dealing with the expansion areas. Access in the city centre needs to be improved.

What Town and Parish Councils said:

The Parish Councils that responded proposed that sites in the urban area including poorly used industrial areas should be developed before green spaces around the current settlements. The commuting into the city centre should be reconsidered. There should be more development in the city before extending into countryside.

What Ward Councillors said:

One Councillor commented that it is unhelpful to have this question here as it implies housing is more important than other aspects of growth. At this point we have no idea of the growth that we want or how much land will be needed.

Another Councillor said that the SHMA provides the best guide but there is no definitive answer. The more successful we are as a City, the more demand for development will be required - the virtuous circle. One question is "Should there be a limit to growth, put on as a brake by constraining the amount of development land available". They considered we cannot/should not put the brake on unless growth becomes unsustainable because the City’s infrastructure cannot support it. The Council must look for ways to fund infrastructure, including funding the inevitable step increase when we reach a threshold size which the Councillor believed will be reached before 2026. To go to a point where infrastructure crumbles through lack of funds would be irresponsible and the Council’s Plan:MK must ensure that it doesn’t reach that point.
Therefore the City needs a Vision to guide Plan:MK. The Vision should be a master plan, not unlike the plan that was in place when MK was first conceived. The infrastructure needs and deliver options must be clearly articulated in this plan.

What Milton Keynes Council departments said:

One team stated that land for critical infrastructure is needed. Densities may need to increase to support sustainability. Allocation of major sites that can fund adequate infrastructure and be relatively self-sufficient to reduce the volume of car movement while connected to the urban area with efficient public transport should be encouraged.

What the industry said (e.g. landowners, developers, agents...):

The development industry has provided a number of alternative Strategic Housing Market Assessments, with an Objectively Assessed Needs (OAN) figure for housing. One agent believed the figure should be 2,359 p.a. not 1,650 to 1,750 as MKC say. The Core Strategy Inspector said an early review will complement the initiatives to help deliver growth and ensure potential for significant uplift. There is no evidence of this positive planning. Completion rates are too low partly due to the delay with the Western and Eastern Expansion Areas. The SHMA figure is too low and there is no explanation of where the historic need has gone. The Full Council on 14 September 2010 recognised housing requirement was 3,280 homes p.a. A longer time period is needed to provide the NPPF 15 year horizon. Average completions in MK from 2005-2013: 1,698 p.a. This should be minimum figure. Employment growth needs to be established before homes figure is decided. SHMA indicates 1,750 to 2,160 p.a.

Consistency between SHMAs is a concern. National projections are not the objectively assessed need. Full assessment or amalgam of consistent SHMAs is needed. Also unmet needs of London (N Lichfield April 2014 report) means 3,008 to 9,169 homes needed. Luton unmet needs should also be considered. Four councils should work together- likely to increase the need in MK. Contingency figure also needed.

Barton Willmore OAN shows 2,275 p.a for MK as part of a wider requirement for Aylesbury, Luton, Bedford and Central Bedfordshire.

Allocations should be made around key settlements to reduce pressure on the wider rural area.

Delays with Core Strategy and Issues Paper mean it is sensible to plan to 2036. 2,359 p.a. is necessary taking into account the PPG, employment growth, commuting and Inspectors’ decisions. The Council say a further 6,000 homes needed.

What local organisations/interest groups said:

1750 homes p.a. is high and only 50 less than maximum of 1800 in SHMA. Shortfall of 4,000 to 6,000 after regeneration sites (1,500 to 2,000) leaves 2,000 to 4,000 to be found either as urban extension east of M1 or preferably in smaller developments around Newport Pagnell, Olney and some selected villages. No further development to South East of MK as current commitments threaten to overwhelm infrastructure. Central Beds has met its East of England needs in 2009 Core Strategy. Map on page 24 is misleading as omits most
of land east of M1. Sites are in conflict with Woburn Sands Neighbourhood Plan, others not allocated or fail to show green belt. Questions about directions for growth need full consultation.

Sufficient open space/green infrastructure needed to maintain or exceed the MK ratio.

**Question 4: Urban/Rural Split**

- Do you think we should continue/maintain the strategy of the urban area of Milton Keynes being the main focus of housing development?
- Of the overall housing need, broadly how many homes do you think it would be appropriate to plan for in the rural area and why?

**What members of the public said:**

A large number of responses (42) referred to concerns about further development around Woburn Sands, Wavendon and the Brickhills. These areas have already taken new housing stock (over 3,000 homes in the Strategic Land Allocation and the former Plysu works/Parklands in Woburn Sands), but East West Rail will interrupt traffic. Roads are clogged at rush hour. Facilities including the hospital cannot cope. The specific boundaries of the ‘Designated Area’ are continually being expanded. It will be better to expand to the north west and north east, Tickford Fields Newport Pagnell, or Aylesbury Vale. More development would threaten the character of Woburn Sands village and the surrounding countryside. The current plan adopted in 2013 and the Neighbourhood Plan should not be ignored. There should be a debate about further growth before any decisions taken. Land is available for 28,000 homes (of which 24,000 are still to be built). The new developments need time to integrate with the older ones. Drainage and power supplies need to be upgraded. Loss of trees as a result of new development. Need to consider those who wish to live in older houses as well as new ones. Amount of new flats is making choice of housing worse. Urban areas should be focus, with unused land in MK suitable. More consultation is required with Aspley Guise. Central Beds have proposed further protective measures within the Parish. Grid roads should be included.

Other comments included: the rural areas have become residential dormitories with no local services or facilities with increasing pressure for housing to increase demand for facilities.

The urban area of Milton Keynes should not continue to be the main focus for housing as it has not facilitated public transport; people still use cars. Choice should allow those who wish and can afford to live in rural areas. This may improve public transport.

The main urban area should still be the focus. This protects the countryside for leisure use.

The Site Allocations Plan seems to be promoting development everywhere.

Stony Stratford is to have 5,000 new homes built to the south so more development would destroy the character of the town. It should retain its historic charm and events. Existing traffic from Deanshanger and schools are oversubscribed.

**What Town and Parish Councils said:**
There should be no change in the proposed split, but priority should be for completing urban sites first. One Parish Council stated that the number of homes should be set by the individual community and it’s Neighbourhood Plan. Government housebuilding targets are unrealistic and should be resisted until infrastructure, services and jobs are in place. Sufficient car parking is important.

**What Ward Councillors said:**

No objective methodology has been put forward to decide how much development goes in the rural area. The rate of growth should be no higher in the rural area than the urban area. A clear definition of what is rural and urban is needed.

The uniqueness of MK with its urban and rural setting should be preserved. Central MK has huge potential for development for housing, retail, leisure and infrastructure.

Central MK is under significant pressure for schools and health provision. Plan:MK needs to recognise this. The urban/rural split should take account of this. East and West expansion is favoured with rural locations such as Olney and the limits of Newport Pagnell.

**What Milton Keynes Council departments said:**

One team agree that the urban area should continue to be the main focus with employment and the infrastructure to accommodate new development. Some rural housing in market towns and key settlements can help the health of rural communities. On the housing figure, the SHMA figure seems appropriate.

Another department said the urban area should remain the focus for housing development and that there is scope for further development.

**What neighbouring and other local authorities said:**

South Northamptonshire Council raises no objection and supports the development strategy.

**What the industry said (e.g. landowners, developers, agents...):**

Sufficient land is needed for 2,500 homes p.a. The urban/rural split should be re-examined. Further expansion of the urban area into the rural area means land should be re-evaluated. Immediate hinterland of MK is prime location for development. Separate rural target should be a minimum: 85 homes p.a. May require more and should keep target under constant review.

Housing to support rural community should be encouraged in accordance with NPPF. Sufficient land needed in the urban and rural areas for 2,520 p.a. Rural figure should not include completions on previously developed land. They should be in addition to the rural figure.

Brownfield land is insufficient so more pro-growth weight to Greenfield sites needed.

Support the focus on MK urban area. The Council should not have a separate urban/rural figure as a number of appeals have only used aggregate overall need figures.

MK has a precedent of incorporating small villages and towns without loss of character by green buffers and linear parks.
Rural areas need support, not just on a small number of settlements. All rural settlements in need of patronage for services should be considered for development.

Objectively assessed need should decide the housing figure. Zero net migration should be a policy decision.

More rural growth can provide flexibility for large urban extensions.

The Council currently has not got a five year supply because the past approach has over relied on large urban extensions. The main rural centres are obvious locations for smaller allocations.

There is no need for a standalone settlement partly because of the time taken for such a proposal to actually deliver housing.

The rural area should take an increased proportion of housing to meet the social and economic needs.

What national/statutory organisations said:

The Highways Agency request that the Council considers public transport and sustainable travel potential. The main urban area is likely to be the main attractor for trips from the rural area. Implications of this should be consideration in rural allocations.

What local organisations/interest groups said:

Agree with the urban area of MK being the focus, but should not have a rural figure as this allows a presumption in favour if there is a shortfall. If there must be a figure it should be the SHMA 80 p.a.

Agree the urban area should remain as the main focus of housing development

**Question 5: Urban Extensions**

- Do you think there is a case for further urban expansion areas? If so where do you think these are best planned and why? If you have land you want to be considered, please submit details using the proforma in ‘Annex-Call for Sites Proforma’
- Reflecting where you think urban extensions should be located, do you have any thoughts as to how they can be planned innovatively, for example, in the use of public transport, energy use, communications techniques or other technologies?
- Do you have any views of the appropriate scale of any urban extensions? If required, do you think one larger site is preferable to several smaller sites?

What members of the public said:

If needed, more development should be identified at more sustainable long terms options such as the western flank of MK into Aylesbury rather than keep extending villages.

Stony Stratford remains one of last few towns with character. Hospital can’t cope. Need schools, surgeries and another hospital before houses started.
EU light and noise pollution levels should be monitored for distributions firms near Wavendon and Woburn Sands. Impacts on health and increased traffic congestion. Need landscaping and balancing lakes. Band of amenity land with trees along A421 needed.

No more urban extensions; estates are too big and soulless.

No extension of Milton Keynes into Bedfordshire, Central Beds has extensive development around Cranfield, Marston Moretaine. Villages should not be surrounded by development. Retain Marston Vale as recreational area. Make the M1 the dividing line. Stop the potential for ribbon development along A421 coalescing Milton Keynes with Bedford. There is capacity within Milton Keynes to accommodate expansion. Take exception to idea of garden town. Expansion to the west is less problematic.

Should carry out an unbiased assessment of the development at Broughton against the concept of MK.

Dormant housing sites and regeneration of industrial areas for housing should considered before green field sites.

Object to continued expansion. Any new development should be small scale and not large green field sites such as Eaton Leys. Development into Aylesbury should not take place, if it is needed it should be East of M1 still in MKC area. One large site is preferable to several small sites. Avoid erosion of green space on edge of city.

Stop coalescing into villages for example Newton Leys and Longville. Grid roads should be extended at all costs.

Endorse the comments of Woburn Sands Town Council and Plan:MK should take full account of WS Neighbourhood Plan as part of Development Plan. No ribbon development and concerned about sites along main roads from Woburn Sands. Woburn Sands has accommodated more than its fair share in accommodating extra houses. Western part of conurbation should take more. Use underutilised industrial sites more to the centre. Please proceed with caution given Core Strategy only approved in 2013. Neighbourhood Plans now under way.

What Town and Parish Councils said:

One Parish Council believed there seems to be an assumption that Milton Keynes will continue to grow, but with no justification. Original plan had specific size and infrastructure planned for this size, so need public debate on appropriate size. No reason to plan for extensions into adjoining authorities. No justification for 'blue areas' (between Bow Brickhill and Woburn Sands) which were rejected by Core Strategy inspector.

Scale of urban extensions should be seamlessly connected with existing infrastructure without crossing established boundaries.

MKC should adopt a policy of not agreeing applications which are unsuitable, e.g. Eaton Leys.

Another Parish Council agreed with these points and added that the policy on urban extensions is being 'made on the hoof' in the Site Allocations Plan and one site of 1 hectare is described as ‘urban extension’ when it is not sustainable.
No case for urban expansion unless infrastructure is appropriate, e.g. towards Junction 13 and Marston Vale with scope for satellite development along E-W Rail.

There should only be further urban expansion if adequate provision is made for extension of green space network.

**What Ward Councillors said:**

Support starting work on new MK Masterplan but reluctant to approve significant extensions at present without consideration of further expansions in the future.

Size and location less important than the fact that they should be part of MK and well connected, not a separate place. They said there are advantages with developments of at least 800-900 homes as they support a primary school and local centre. Larger sites need phasing to avoid residents living in a building site longer than necessary.

**What Milton Keynes Council departments said:**

One team said there may be a case for further extensions of 2,000+ homes to support key infrastructure. However they must have appropriate connection and not become isolated. Should respect surrounding communities and natural environment and be viable. Joint working and planning to ensure revenue burden does not fall unduly on MKC. Should promote sustainable connection including electric buses with district services, district heating etc. Sufficient space needed for services. Scale should provide for key services to reduce need for car journeys, but also small enough to foster community. Single site in right location and scale not to stand alone.

Sites proposed in the Site Allocations Plan equally applicable to Plan:MK.

**What the industry said (e.g. landowners, developers, agents...):**

The East-West Rail prospectus will support economic growth so MKC should support urban extensions such as south of MK adjacent to the E-W Rail. Development could expand MK south of the rail line, provide a bridge and have little impact on surrounding settlements.

Another developer said yes, but due to constraints MK will have to develop beyond the boundary in Aylesbury, south west of Milton Keynes (including Manor Farm). A list of reasons was provided and details of the site which could provide up to 10,000 dwellings, a new transport hub and reserved land for a southern relief road for Bletchley. Numerous previous studies have all identified this location which can provide infrastructure. It is a smaller part of Salden Chase, a site identified for 5,390 homes submitted in 2010, and is a more deliverable option.

The main urban area and previously developed land should be the first potential for new housing land, said another agent, followed by village expansion and sustainable urban extensions. The 5 year supply is not met by urban extensions. Two sites which are currently in business use could be used for housing.

Would seek to reserve right to comment when the urban extensions are identified.

Small urban extensions tap into existing infrastructure but rarely protect positively the economy of the settlement. The Plan needs a clear identity of growth rather than piecemeal development.
Several agents/landowners put forward their sites for consideration

- Little Linford Lane, Newport Pagnell conforms with Core Strategy Policy CS1. The previous flooding concerns are incorrect and the site could be potentially brown field.
- Land north of Wolverton Road, Great Linford is a logical urban extension in between Oakridge Park and Redhouse Park.
- MK East is potentially appropriate for employment use, essential for four reasons listed.
- South East Strategic Development Area was proposed in earlier versions of the Core Strategy. Grid road reservation corridor is available. A new grid road could run through Church Farm to the H10 and east towards the Strategic Land Allocation. There is potential to relocate the station reducing the impact on Station Road in Woburn Sands. A joint approach from relevant landowners provides six benefits listed. Could be a series of three or four linked villages.
- Shenley Dens has potential (if not included in Site Allocations Plan). Landscape led urban extension of 550 homes which could be enlarged. Detailed work prepared and submitted. Links well to existing area. North of MK constrained by flood risk. East is constrained by motorway. A range of size of sites for urban extensions is proposed.
- Eaton Leys, split between MK and Aylesbury, 1,800 homes total of which 500 in MK. Two primary schools, local centre, extension to linear park and other open space. Scoping report submitted in September 2014. Technical information on flood risk, heritage, ecology and access. Site is available now and deliverable in 10 years. Size of sites should be 1,000 dwellings or more.
- Land adjacent to site G10 in the SHLAA has fewer constraints and access to A4146. Together with G10 this site can achieve a sustainable option. It can maintain the separate identity of Little Brickhill and could achieve 1,300 dwellings. There is wider land ownership. Reference is made to land in Aylesbury adjacent to Newton Leys for 1,000 dwellings.
- Land at Bow Brickhill is the most sustainable and can provide a new rail crossing, green corridors to prevent coalescence. The site is adjacent to Brickhill Station and can improve access to the Tilbrook employment site.
- Deethe Farm Woburn Sands was refused permission in 2012 as it was outside the settlement boundary, but it has no other constraints. It is an appropriate rural site.
- Land west of the Western Expansion Area (Area 11). North East of Calverton road 54 hectares could provide 950 dwellings. Yes this ‘WEA Southern expansion land’ is a logical extension of the WEA.
- Caldecotte Farm, east of Willen Road and land off Willen Road Newport Pagnell are promoted for housing. Land at Marsh End Road Newport Pagnell is also put forward.
- A northern expansion area at Haversham was also put forward as either a garden town of approximately 8,000 dwellings, or a garden village of 2,800 dwellings.
- Other sites also submitted for consideration.

What local organisations/interest groups said:

One organisation referred to the Peer Group report on MK2031. Further development South East would have a negative impact on infrastructure and the separate identities and environment of those communities. E-W Rail will close the level crossing and compound traffic problems at this pinchpoint. The Woburn Sand Neighbourhood Plan is supported. Do not support the sites in Central Bedfordshire and they are not supported by the Council or its Plans for Central Beds. We are of the view that several smaller sites is preferable to one larger site to accommodate the additional 5 years of growth.
Another group hoped that lessons can be learned from the Eastern and Western Expansion Areas. A well-structured and integrated urban extension could recognise these issues. East of the M1 should be considered as advancements in transport technology mean this should be looked at, for both housing and employment, up to 10,000 dwellings. Stronger links with Cranfield and advanced links for CMK and the Eastern Expansion Area.

It was also raised that the Local Plan 2005 Inspector stated land west of MK was more sensitive than to the east and further removed from the M1. Extensions should not go to the west especially to the north west where there is no rail infrastructure.

A local community group said that it had been made clear in 2009 that expansion across the M1 was not wanted by MK and was the least viable of any of the then expansion options. That position has not changed and we hope it remains the position of MKC. The local community objects to the inclusion of the option for expansion across the M1 into Central Bedfordshire. They state that there is existing capacity around and within MK's existing boundaries and settlement hierarchy to accommodate expansion, and any expansion should be within Buckinghamshire. They also say that limited areas for growth have been identified within the Central Bedfordshire Development Strategy and these should be respected and retained. Expansion over the M1 has the potential to initiate ribbon development along the A421 to Bedford, harming the regeneration of the Marston Vale and leading to coalescence of MK and Bedford. They also state that discussion of a garden town is offensive to a community that fought the 'eco town' proposals.

### Question 6: Employment Sites

- Do you have any thoughts on the loss of employment sites for housing?
- Are there any particular undeveloped sites where you think housing could be suitable? Please submit details using the proforma in 'Annex: Call for Sites Proforma'

### What members of the public said:

Should consider allocated employment areas for housing with those lacking investment considered first. Need more flexibility in future employment sites. This should be done urgently.

More small and macro businesses mean there should be more mixed light commercial and residential use.

### What Town and Parish Councils said:

Support some undeveloped employment sites being re-designated for housing, as it is more sustainable and reduces pressure on rural areas. Pre-fabricated buildings for employment would help start-up businesses. There should be safeguards to prevent owners holding up development of employment land in order to reuse for new housing.

Employment land should be kept as it is to help sustain and grow the city. Where not needed and there is a housing shortfall, use old employment land for housing.

### What Ward Councillors said:
As minimum, MK needs flagship employment sites, a range of office and industrial spaces and small micro-business ‘incubator’ space. Employment land should be dispersed so there is plenty of choice.

Plan should look at location and types of employment land. Offices do not do well out of centre, but we could harness unmet demand in centre.

What Milton Keynes Council departments said:

Only redevelop if employment is unlikely. Relocate employment to realistic sites. Need to meet 1.5 jobs per dwelling and have accessible high standard sites.

Change of employment sites to residential should not be at the cost of residential losing allocation. Longstanding undeveloped employment sites could change where would fit with adjoining developments.

What the industry said (e.g. landowners, developers, agents...):

Land south of E-W Rail has numerous buildings suitable for dwellings.

One agent stated their client had three parcels of surplus land one of which is in the Strategic Land Allocation. The other two sites in Wavendon are promoted for housing as in Site Allocations Plan.

A thorough and robust assessment with evidence is needed to change employment sites. It is important and essential to maintain dispersed employment sites to provide choice and avoid rush hour congestion.

For undeveloped sites, Tickford Fields Newport Pagnell can provide 1,200 homes.

Railway works in Wolverton supported for housing as part of mixed use scheme.

Sites undeveloped since 1970 and unsuited to business should be reviewed in line with para 22 of the NPPF.

The evidence base is needed to change employment sites and it should also show where new employment should occur, before any change is proposed.

Plan:MK should not displace any employment uses. Magna Park took only 7 years to complete, where are logistic investors developing in the next 20 years? Land is needed close to the M1.

What local organisations/interest groups said:

The Council should decide which employment sites are re-designated, not the developer. There is a reduced amount of land at Nampak Woburn Sands.

Should not allow housing on employment land without explanation of where employment is to be accommodated. Should not replace one pressure with another in rural areas.
Question 7: Regeneration

- Do you have any thoughts on how regeneration can be best supported through the Development Strategy and other Plan:MK policies?
- Do you think the Development Strategy should include regeneration to help meet housing need, or should any homes delivered through the Regeneration Programme be seen as windfall and additional to planned supply?

What members of the public said:

Would like to see regeneration of existing areas.

Planners cannot solve poor quality housing; best solution would be to remove poverty. Poor quality public realm is due to lack of funds. Cannot solve skills, employment and educational achievement by regenerating housing. Two problems: 1) like all cities there are poor people and 2) need more housing.

Any regeneration should deal with improving housing quality and public realm and should be separate from social problems and need for more housing. Definition of an ‘area’ needs to be clearer. Generous public realm makes places more pleasant for the least privileged in our society.

It is essential regeneration is included and if scope for more housing it should count towards need rather than windfall.

What Town and Parish Councils said:

One Parish Council resolved that homes from regeneration should be windfall and additional to planned supply.

There are good reasons to develop MK consistently and areas should not be left behind.

What Ward Councillors said:

Development policies should support development for employment, education and social enterprises in regeneration areas with new residential uses.

Regeneration is led by housing and Plan:MK must support this with more affordable homes and funding help for the improvement of other homes. Bletchley needs attention and E-W Rail makes this viable.

It is important that infill takes account of need to expand existing facilities. Regeneration should be part of the Development Strategy.

What Milton Keynes Council departments said:

Flexibility needed to support development of degraded sites. Intensification may support the provision of new facilities. If a figure can be identified than this should be added to the Development Strategy. It will allow such proposals to feed into the Local Investment Plan.
What the industry said (e.g. landowners, developers, agents...):

Yes previously developed land should be the focus for regeneration. This should include employment land as the highest priority in the delivery of housing to meet the objectively assessed need.

The International Sporting City initiative could regenerate part of the City as the Stadium site shows. Uncertain about number and delivery of these sites so they should be windfall.

Homes delivered on these sites should be included in the supply. May need contingency for those that are not delivered.

Proposal at Eaton Leys can assist in regenerating a wider area with new developments and directly related improvements to infrastructure.

Council needs to identify with specialists, opportunities of regeneration in light of its vision. This is necessary to avoid a two speed city.

What local organisations/interest groups said:

Open spaces and green infrastructure should be recognised as catalyst for regeneration. Strong policies on green infrastructure contributes to regeneration objectives.

Better use of undeveloped land in the City should be considered. Current draft regeneration strategy should be broader and look at intensification rather than densification and align more closely with Plan:MK strategy.

Question 8: Standalone Settlement

- Do you have any views on planning for a standalone settlement somewhere around Milton Keynes?
- If you think it is a good idea, do you have any thoughts on where it would most suitably be located, what size it should be and the development principles that would underpin it?

What members of the public said:

Standalone settlement would score very badly on sustainability and increase car commuting. No logical location for a garden city as a spur off an existing garden city!

Oppose a standalone settlement. Too many housing developments in the South East without thought about infrastructure. Surrounding roads not upgraded to deal with daily commuter traffic.

No problem with a standalone settlement; it would offer new set of choices.

Case for a standalone settlement should form part of post 2031 plan for the ultimate size of Milton Keynes.

We need at least one example before being able to comment; would it be based on the population needed for a single primary school?
Believe that all three alternatives, of new settlements, urban extensions and regeneration, will need to be considered as part of the approach to deliver housing needs.

**What Town and Parish Councils said:**

Before considering new settlement option, all other options for land supply should be explored and discounted within and adjoining existing settlements. Potential for new settlement to the south would have detrimental impacts on Leighton Buzzard Town Centre and master plan. It would also burden existing infrastructure which is already struggling to cope with rapid population growth.

Town Council would not support any further standalone settlements.

If more housing is developed in Wavendon, it should be free of affordable housing requirement.

Opposed to standalone settlement as it is against the ethos of Milton Keynes.

**What Ward Councillors said:**

Any substantial development should be part of Milton Keynes so any new settlement should be avoided.

Needs to be addressed in vision. E-W Rail presents opportunities. Should seriously consider west. Western Expansion Area goes up to our boundary but could go further.

**What Milton Keynes Council departments said:**

Could be a viable option, but infrastructure cost higher and could become dormitory settlement feeding workers to Milton Keynes. Could link with affordable and efficient public transport but need to assess loss of the open countryside. The scale is vital to ensure self-sufficient and can pay for new infrastructure.

**What neighbouring and other local authorities said:**

No site in Moulsoe Parish is suitable.

**What the industry said (e.g. landowners, developers, agents...):**

This should only be considered after all other means of delivering housing have been fully exploited.

This option (15,000 homes or more), should only be considered after available and suitable sites on the edge of larger settlements in the rural area have been fully considered. It would take many years, so sometime before it could contribute.

This question cannot be answered in absence of the vision.

There is no need to consider a standalone settlement.

Council should be cautious on this. Very limited opportunities; long lead in times and expensive for infrastructure compared with smaller single ownership schemes on the edge of existing settlements. It would provide a limited contribution to meeting the short term...
housing supply particularly in the first five years. To deliver at least 2,275 dwelling per annum, the most sustainable strategy will be to allocate urban extensions on the edge of Milton Keynes including land at Eaton Leys.

We do not agree that a standalone settlement would be the best or most sustainable option for the Council area. It would need new infrastructure whereas the urban extension approach can tap into and serve to support existing infrastructure within the City. A new settlement may even jeopardize the delivery of new development at the City itself.

Do not support a standalone settlement to deliver the quantum of development for Plan:MK. They take much longer to deliver because of the primary infrastructure needed before any houses are completed. Costs impact on the delivery of affordable housing. Most residents would work in Milton Keynes so good transport links are needed which adds to the costs. Easier and more sustainable for urban extensions to connect to existing cycle and public transport networks

Evidence shows standalone settlements in the current planning and economic climate is almost impossible. Wolfson prize winners showed assumption that all garden city infrastructure being funded from land value capture is ‘heroic’. Significant additional funding is necessary but it is critically short and better alternatives exist.

**What national/statutory organisations said:**

Needs to be considered in more detail and impacts should be assessed through evidence. Without employment and retail, the main Milton Keynes area will attract many trips and the car may be the most attractive mode of travel.

**What local organisations/interest groups said:**

Strongly oppose such a proposal, insufficient demand (4,000 to 6,000 dwellings) and insufficient land area without environmental, rural community damage and substantially increased flood risk.

If option chosen then should include provision for adequate parkland/green infrastructure.

Need to understand impact of new development on existing urban area and overloading the city centre, the infrastructure and roads of which have not been designed for this increase. The existing proposed growth for Central Milton Keynes should be questioned as part of the Plan:MK process. If standalone settlements are to be considered then they should be of a size able to support infrastructure - 15,000 dwellings as starting point. Should be strategically located as part of overall regional growth vision.

No opportunity in Calverton parish.
Question 9: Wider Housing Market Area

- Do you have any thoughts on how additional housing need across the HMA should be planned for?
- Is there scope for the MK housing market to support delivery of more than 1,650 homes per year on average up to 2031 if additional growth is planned on the edge of Milton Keynes?
- Do you think there is merit in seeking to provide some of the Milton Keynes 1,650 housing need in extensions into neighbouring areas (which would clearly need to be investigated and planned with our neighbours)? If so what do you think the justification is for this?

What members of the public said:

Milton Keynes should check with Central Beds regarding the green space designation for Aspley Guise Parish which has much support. No support from the community for development south east of Milton Keynes in the Central Beds boundary areas. There should be no development in neighbouring areas such as Beds or Aylesbury as there is sufficient land in Milton Keynes boundary.

What Town and Parish Councils said:

No reason why housing requirements of any one authority should be provided by another.

Sites in Central Beds rejected by that Council. Part of Aspley Guise is designated as green space and clearly regarded by Central Beds as unsuitable for development. Development into Central Beds is unsuitable because Central Beds provide 4,600 houses within the MK Housing Market Area and consider they have identified sites to generate 5,410 houses exceeding this requirement, so further allocation is not required.

Milton Keynes covers a wide area and a considerable land supply unlike Luton which is very restricted. From information provided it appears MK prefer to expand south, east or west rather than using their own land to the north. The map provided is misleading as it does not show whole of the MK authority area to the north of MK.

Site Allocations paper proposes caution with further development in Woburn Sands. In a wider view developments in the south and east have already taken much expansion which impacts on traffic and congestion, so expansion in these areas should be resisted in the new plan. Rail crossings not addressed so further development here is unacceptable because it would lead to coalescence of villages.

If further expansion of MK into Central Beds then they should lead on finding location. Salford is unsustainable as it is not contiguous with any development west of the M1. It would cross the M1; long regarded as a barrier to development and would lead to coalescence of villages and strongly opposed by this Parish.

Joint submission of further response with Ridgmont, Hulcote and Salford, Lidlington, Brogborough, Marston Moretaine, Husborne Crawley and Aspley Guise; demonstrates the level of disquiet over potential expansion into Central Beds. The Parish request that MK consult with Cranfield and other neighbouring parishes in Central Beds in the future.
Joint response of the above Parishes states: MK can and should deliver all of its identified housing need within the MK Unitary Authority Area. Limitations on housing development within the MK area in the Core Strategy are inconsistent with the presumption in favour of sustainable development and should be reviewed in Plan:MK. Five issues listed which need to be addressed include revising the urban area, increasing the rural target, abandoning the urban-rural split, and creating one or more standalone settlements. By addressing these issues there will be more than enough capacity for all MK’s housing needs. Therefore there is no need to deliver housing in adjacent areas including Central Beds.

The areas of growth in the submission version of the Central Bedfordshire Development Strategy should be respected and retained. The figure of 230 homes pa is more up to date than the 257 homes in the Housing Topic Paper. It is for Central Beds to set out where these homes will be delivered not Plan:MK. There is a need to avoid coalescence along the A421. The areas on the Plan:MK map are not needed as the areas for growth are already identified in the C Beds Development Strategy.

No more development should be planned in the South East of MK until major traffic issues are resolved. Rural villages in Central Beds are struggling under the weight of traffic which seeks to avoid delays on major routes. The A412 improvements may go some way to alleviate this but will be offset by the increased traffic from the housing development already planned in the South East of MK. Electrification of the Bletchley to Bedford railway will result in closure of all level crossings and the need for at least one new bridge with no obvious routes for traffic to reach the bridge.

Another Parish believes this should be avoided and also not for neighbouring authorities to build within MK.

Bedfordshire Council’s Planning Consortium opposes any such expansion very very strongly.

Another Parish Council state that as the E-W infrastructure is improved development into neighbouring authorities seems more sensible than other directions.

What Ward Councillors said:

No credible data on optimum rate of growth to serve our vision or mix of dwellings. The question the 2014 SHMA has answered is unsurprising. It cannot be assumed an alternative question around the vision would have led to the same answers.

What Milton Keynes Council departments said:

Joint working should be formalised to produce and test options. Plan:MK should be produced collaboratively. The public should get involved to formulate a strategy for the future. There is scope to increase the average number of homes but only if funding for infrastructure is available. Development in neighbouring authorities has merit provided infrastructure is funded and agreed between relevant authorities. There are risks however. If planned well with all the required infrastructure it is possible extensions across borders could provide for the Housing Market Area and support economic growth.

What neighbouring and other local authorities said:
Recent work by ORS identifies that Wycombe, Chiltern, part of South Bucks and the southern half and majority of the population of Aylesbury are in one housing market area. Wycombe wish to flag that in the eventuality that the combined need for the HMA cannot be met within, they would seek to discuss the possibility that Milton Keynes may potentially be able to accommodate some or all of this unmet need.

Central Bedfordshire wish to ensure all suitable locations within MK are fully considered before looking into other local authorities. The plan only shows land adjacent to MK and directions of search should be identified rather than specific sites. There are swathes of land north of Milton Keynes which should be investigated, prior to looking for land in neighbouring authorities. Green Infrastructure Action Area on land east of MK within Central Beds. The Topic Paper map includes two sites in Central Beds. Both sites have recently been considered through the site assessment process for the Development Strategy, but were not allocated. The land west of Salford is not required and there were concerns about coalescence with smaller settlements and setting precedent in relation to development north of the M1. Aspley Guise has a more detailed planning history and although the Central Beds North Core Strategy (2009) identifies the site, the Development Strategy for Central Beds has not carried this forward. It was not required and unsuitable due to impact on local residents, landscape, coalescence and congestion. This Strategy also proposes Local Green Space north of Aspley Guise. Will continue to maintain open dialogue.

What the industry said (e.g. landowners, developers, agents...):

Oppose any development in Aylesbury Vale as more sustainable sites in Milton Keynes boundary, such as land south of the E-W Rail. Raised concern that MKC is using taxpayers funds to promote development in Aylesbury Vale which casts doubt on the bias of Plan:MK.

Development will be needed in wider HMA as well as within MK administrative area to provide total amount of housing needed for objectively assessed need and economic growth. Growth of 1,650 can be planned with development in appropriate locations which will necessitate growth in neighbouring districts. As well as 1,650 there is the need for the sufficient housing for jobs within the City. Insufficient sites in MK therefore imperative that neighbours accept need for urban extensions in their districts.

MK needs to deliver 2,500 houses within its administrative area with extensions to settlement boundaries in the urban area and villages, use of previously developed land and change of use of employment land.

There is scope to support more than 1,650 homes and the landowner’s site will help meet those requirements.

Plan:MK must have a clear vision and real direction with infrastructure and services essential for community to thrive. Ratio of 1.5 jobs per home must continue and strengthen for 1,650 pa or if chronic shortfalls are met more quickly. Co-operation is needed to generate development in neighbouring areas where appropriate.

MKC and AVDC should be working together to realise strategic growth South West of MK.

Para 108 identifies 550 dwellings. Once Duty to Cooperate has been completed this will be higher. Objectively Assessed Need for MK HMA by integrating housing and employment strategies would be 7,042 pa. For MK it will be 2,359 p.a. It is these levels that should be
planned for. It is unclear whether this can be met within MK and if not, discussions with neighbours should take place. A proportion of unmet need will need to be directed to AVDC. South West MK is a sustainable location as justified by numerous studies.

Rural settlements may accommodate a greater level of development to meet in excess of 1,650 p.a. This would avoid the need for allocations in neighbouring authorities.

No joint plan or evidence base. Should avoid inconsistent SHMAs. The unmet needs of other authorities should be considered.

At least 7,950 pa is required across the Luton Milton Keynes HMA. For MK, that equates to 2,275 pa. The Council’s 1,650 falls below this and fails to comply with the NPPF. Eaton Leys has merits to meet the housing development needs of the area. We support the MK HMA crossing into AVDC and there will be a need for the Duty to Cooperate.

Some constraints in some locations e.g connectivity barriers of the M1, extensive flood plan of the River Ouse and landscape features to the west. Potential to the south and east and extending into Aylesbury may be the best solution. Northampton has planned its urban extension in a neighbouring authority.

The housing market is buoyant to deliver in excess of 1,650 dwellings provided appropriate supply of sites within MK as process of seeking agreement with neighbours has no guarantee of a successful outcome.

Ad-hoc development is needed as urban extensions may not be developed. Should consider additional allocations on key settlements- Newport Pagnell. There is scope for more than 1,650 pa.

Additional housing in the MK HMA is needed to reduce commuting by car. Clear directions of growth from nine studies/plans which were listed in the response. MK housing market is strong and can deliver more than 1,650 pa. Merit in providing additional housing to south east of MK in Central Beds.

Housing supply should be planned to meet the Objectively Assessed Need of the Wider HMA, with neighbouring authorities, in accordance with the NPPF. The DLP Objective Assessment of Need Report sets out a requirement for 6,879 dwellings p.a. for the Milton Keynes HMA and 2,359 dwellings p.a. for MKC. The Housing Topic Paper wider HMA sets housing need of 550 homes from other authority areas, does not include any housing from Luton. We consider Luton forms part of wider HMA for Milton Keynes and with the Duty to Cooperate with Luton, Milton Keynes must accommodate some of the outstanding housing need for Luton.

What local organisations/interest groups said:

Duty to Cooperate means consultation but as for Central Beds they have discussed their housing needs with neighbours and at the time there was no need from MK. No evidence in Topic Papers to suggest a change. Unable to comment on situation with AVDC. No justification to “off load” some of MK housing requirements to neighbours when MK unlike Luton is not boundary constrained. MK2031 is no justification.
Another local society object to any proposal to expand MK into Bedfordshire. The landscape east of the M1 is attractively rural and should not be enveloped by urban expansion. Central Beds Development Plan has no growth in these locations. There is room for MK to expand to the west.

Question 10: Rural Settlement Hierarchy

- Do you think the current settlement hierarchy with Newport Pagnell, Olney and Woburn Sands as Key Settlements remains appropriate?
- Should a more dispersed pattern of housing development be considered? If so, which other rural settlements do you think could take some new housing development?
- Are there any sites you think we should be considering in developing a strategy for accommodating rural housing need (please use the proforma in ‘Annex: Call for Sites Proforma’)?

What members of the public said:

Current hierarchy should stay in place with rural development skewed towards Woburn Sands which is more sustainable with E-W Rail.

Hanslope should remain as a village. There is scope for housing within the village with no negative impact on resources but a positive impact on local housing issue.

Bow Brickhill should remain as a village with a green corridor separating it from the urban area. Blind Pond development will increase the village by 12%. Milton Keynes has reached a size where further development is unnecessary or desired.

Agree with hierarchy as long as transport routes are improved, local facilities reduce need for increased population to travel out of the community. Encourage public transport; people who move to Woburn Sands should use the train. Bow Brickhill needs a bypass. Existing properties should not be damaged by new development.

Should be no development in Woburn Sands and Wavendon. Thousands of homes with permission but not built, why further expansion at all? Power supplies need to be upgraded, water supply, waste removal and traffic congestion with noise and fume pollution should all be considered. Effects of E-W Rail should be understood. Why new plan when existing one has several years to even approach completion. Point is the Government has missed is shortage of council or social housing. Empty properties could be brought back to use. CPRE identified brownfield sites for 1.5 million houses. The quantity of housing has improved. Current Plan only adopted last year being abandoned. Neighbourhood Plan should not be ignored.

Chief concern is that green space in older estates is as valuable or more valuable than rural green space.

One respondent said they were open to some development in Bow Brickhill, Blind Park Pond will be welcomed provide it fits in with the village. No high density so proposals by the Bow Brickhill station and up to the A5 are not acceptable. Opposed to further
development at Woburn Sands and Eaton Leys because traffic through village would be serious. Retain green belt around village. Praise for MKC coming to the village to consult locally.

Unsatisfactory to have blanket ban on all very small villages. Condemns Lathbury to a lingering death.

Concept of rural hierarchy remains appropriate and should resist more dispersed pattern of development.

No, the strategy should be reconsidered to a more dispersed form and consider whether additional villages could be expanded e.g. Sherington or are close to other villages e.g. Emberton etc.

**What Town and Parish Councils said:**

Woburn Sands is meeting more than its fair share of the rural housing requirement from the Core Strategy. The longer term housing target for Plan:MK is not accepted. There should be no further growth until Parklands and the Greens site is complete; this policy is in the Neighbourhood Plan endorsed by 89% of the residents support.

Parish of Wavendon is the exclusive provider of about 2,900 new dwellings in the SLA (Strategic Land Allocation) and has no capacity in infrastructure. On completion of Parklands the local services will be at capacity and no further development will be sustainable without a step change increase in services. The SLA local centres will service the needs of the early pathfinders in the SLA sites. There is no reason why there should not be a dispersed pattern of housing provided infrastructure adequate and integrity of settlements is protected.

Haversham recognise the need for new housing in the whole of MK and propose an expansion of approximately 20 houses comprising retirement/bungalow and larger 3 or 4 bedroom accommodation as they are in short supply in the Parish. A mix of a larger site with one or two smaller ones deemed best to avoid all new houses in one area.

Given that 65% of the rural population is in three towns it is difficult to see an alternative policy could avoid completely overwhelming existing villages. Only viable policy is to continue with key settlement framework supplemented with smaller numbers in Neighbourhood Plans with democratic mandate. It should be the settlements themselves who offer to take new houses.

**What Ward Councillors said:**

Newport Pagnell is now a contiguous part of the conurbation and Woburn Sands arguments for rural settlement description becoming more tenuous. There should be a percentage growth for MK as a whole including the rural area. This will be a low percentage and low number so the genuine rural area will not be disadvantaged by Newport Pagnell’s category change to part of the conurbation. Should have an objective assessment of rural housing need.

Concern was expressed over the settlement hierarchy. There is significant pressure on social infrastructure and space is at a premium. Plan:MK needs to recognise this new reality.
What Milton Keynes Council departments said:

Yes, it is important we maintain this hierarchy and continue to improve infrastructure in rural settlements. Housing development should be in settlements with infrastructure to accommodate the increase. Areas without sufficient services and the costs of providing these outweigh any gains. The character, heritage and environmental setting should be considerations.

What the industry said (e.g. landowners, developers, agents...):

All settlements need to take housing.

Newport Pagnell is in a rural area but will fulfil an urban expansion role. Little Linford Lane site could be a Newport Pagnell expansion and a continuation of a strategic reserve site north of the city from Wolverton Road Great Linford, to land adjacent to the motorway service station currently under development. Site will cater for rural need (450 in Site Allocations Plan) and/or provide part of the urban capacity figure. 338 houses proposed of which 118 affordable. If not allocated in SAP it should be allocated in Plan:MK.

The rural settlement hierarchy should be opened up and sustainable development be encouraged in the rural area in accordance with the NPPF. All rural settlements should be considered, so advocate a more dispersed pattern of development. Any target for rural housing should not prevent housing in other rural settlements if required for the sustainable development of these locations.

Newport Pagnell is the largest most sustainable settlement. We support the settlement hierarchy. The majority of the housing need should be allocated in Newport Pagnell.

The Borough is so small it should be planned as a whole, no need for an urban/rural split. If forced it may be a Hanslope rural area and a Sherington rural area. If MK is to grow, the precedent is to incorporate smaller villages without loss of their character. Green buffers, flood plain, ecological or environmental features can be identified and planned for.

NPPF suggests it is no longer appropriate to rely on a settlement hierarchy. More dispersed pattern should be considered for all settlements in the Rural Issues Topic Paper. Wavendon can accommodate small scale housing north of Wavendon and east of Stockwell Lane.

Castlethorpe, Shepperton Close is promoted; Castlethorpe is a sustainable location with First School, village shop/post office and church.

The three settlements should remain as key settlements as they are the most sustainable. More dispersed pattern should not be considered.

Each rural settlement should be considered according to sustainability it offers. Villages with little or no services should not have significant residential development.

Care should be taken on new allocations as it will impact on wider transport network.

Detailed site description of land on eastern flank of Hanslope, between Eastfield Drive and Newport Road for 25 dwellings with a range of dwelling types.

Land south east of Wavendon on 3.36 hectares proposed as part of a larger south eastern extension of MK. Site is available and unencumbered.
No systematic review of settlement boundaries since 1995 Local Plan. It is long overdue and must be undertaken in Plan:MK. Site proforma for land at Wain Close, west of Newport Road, Woburn Sands. Adjoins settlement boundary and is previously developed land, well related to station and bus services. No constraints. Need for business expansion not known in 2011.

Sites submitted with proforma in North Crawley: South of High St, Parcels A & B East of Folly Lane, West of Folly Lane and Orchard Way. Also Elm Hill Farm and Manor Farm in Astwood.

What local organisations/interest groups said:

Yes in part. Woburn Sands has taken more than its share of rural development. Parklands plus other smaller sites will have increased the town by over 50%. Oppose further development as the infrastructure is at capacity and the town in danger of being swamped by a combination of the amount of development and the East-West Rail link potential increase of rail, both passenger and freight traffic with the crossing being closed for considerably longer than at present, bringing the High Street to grid lock. We suggest MK Council respects Woburn Sand’s adopted Neighbourhood Plan.

Question 11: Employment Allocations

- Do you have any thoughts on the reallocation of land allocated for employment use for alternative uses? Are there any employment allocations which you think would be better put to an alternative use?

What members of the public said:

One member of the public responded and supported the reallocation of employment sites on the basis that the economy and needs of businesses will have changed significantly since designation. They also considered that people would not choose to live close to work as other considerations were more important in home-selection. To encourage shorter journeys it would be better to locate employment sites next to supermarkets, schools and childcare facilities.

What Town and Parish Councils said:

The Parish Councils that responded generally supported the reallocation of employment land to reduce pressure on rural areas. However, some were concerned that reallocating employment land could generate a new pressure on rural areas to accommodate employment development instead.

What Ward Councillors said:

Two Councillors responded to this question. One suggested that land allocated for employment does not have a more important use. The other indicated there were no employment sites in Central Milton Keynes that were suitable for housing.

What Milton Keynes Council departments said:
MKC departments suggested that the overriding priority should be maintaining a target of 1.5 jobs per dwelling. If this can be maintained whilst reallocating non-viable employment land, then that should be considered. The regeneration effects of reallocating employment sites should also be considered.

**What the industry said (e.g. landowners, developers, agents...):**

The development industry had split opinions regarding the reallocation of employment land. Those with landholdings including vacant employment land and those seeking large-scale new employment sites naturally supported the reallocation of existing employment land. Others opposed the reallocation of employment sites, suggesting they represented future investment opportunities for Milton Keynes and a means to keep out-commuting under control. Others suggested the evidence of the EGELS would be needed before judgement could be made.

**What local organisations/interest groups said:**

Local organisations generally supported reallocation where appropriate. The Parks Trust suggested that green infrastructure should itself be considered an alternative use.

**Question 12: Employment Land**

- Do you think there is benefit in looking to provide larger employment areas, that may be easier to serve effectively by public transport?
- Do you have any thoughts on innovative approaches to incorporating employment land into the future Development Strategy for Milton Keynes?
- Would you support the reallocation (and re-provision elsewhere) of some existing vacant employment land to other uses to enable the provision of a more accessible development strategy, even if the EGELS suggest existing designations are sufficient in quantitative terms?

**What members of the public said:**

The members of the public that responded supported both the idea of larger employment sites and dispersed employment patterns. They also suggested that greater concentration could be achieved by building upwards or downwards with underground employment facilities.

**What Ward Councillors said:**

One Councillor suggested that smaller dispersed employment sites were desirable due to the dispersed traffic impacts. Another considered that research should be done into precedents elsewhere of singular large-scale employment sites.

**What Milton Keynes Council departments said:**

MKC departments suggested we should focus on developing employment sites alongside East-West Rail stations. They also considered that mixed-use sites to increase job density in older towns/estates should be pursued.

**What the industry said (e.g. landowners, developers, agents...):**

The development industry supported both larger employment sites and the existing dispersed pattern, depending on what their particular interests were. They suggested the benefit of larger sites was a ‘critical mass’ that would justify particular public transport solutions. The benefit of a dispersed model is that there is a variety of land to encourage a diverse economy, including smaller units for start-ups.

What local organisations/interest groups said:

Local organisations generally did not support large-scale employment sites on the basis that they had a large footprint and were generally low-skill. The Council of Faiths strongly supported alternative uses for underused employment sites as they were generally in locations where faith groups could meet without inconveniencing neighbouring properties.

Question 13: Open Space

- Do you have any views on the considerations set out above?

What members of the public said:

The public all supported the retention and expansion of the linear park system.

What Town and Parish Councils said:

The Town and Parish Councils that responded all supported the retention and expansion of the linear park system.

What Ward Councillors said:

One Councillor responded and suggested that Plan:MK needs to address play area provision including existing ones. They also suggested that suitable visitor facilities should be provided at all new leisure facilities whilst an overall strategy for sports facilities should help avoid a ‘monoculture’ of football pitches.

What Milton Keynes Council departments said:

MKC departments suggested that the open space in Milton Keynes had many benefits and should not be given up lightly. They highlighted that particular environmental features, particularly to the North and East need protecting anyway.

What the industry said (e.g. landowners, developers, agents...):

The development industry all supported the linear park system as a key characteristic of the city and each proposed to incorporate some element of it within their own proposals.

What local organisations/interest groups said:

The Wildlife Trust suggested that Plan:MK should encourage improvements to the management of open space so as to provide the best outcome for biodiversity. Other local organisations supported the linear park system and encouraged its expansion into new development areas.
Question 14: Environmental Constraints

- Do you have any views on particular environmental constraints that limit where Milton Keynes could grow and the issue we should be investigating?

What members of the public said:

The one member of the public that responded suggested that the capacity of older rural roads was an environmental constraint.

What Town and Parish Councils said:

Town and Parish Councils said that we should consider extreme weather (e.g. flooding) as an environmental constraint. Others suggested that landscape was the predominant environmental constraint, with the east of the city being less sensitive than the west.

What Ward Councillors said:

Councillors considered that environmental constraints were generally well understood, although water supply may need more careful consideration in the coming years.

What Milton Keynes Council departments said:

MKC departments suggested environmental assets should be incorporated into development to reduce the impact of constraints.

What the industry said (e.g. landowners, developers, agents...):

The development industry all pointed to the relative lack of environmental constraints affecting their particular landholdings.

What local organisations/interest groups said:

The Wildlife Trust highlighted the various ecological designations and opportunity areas as environmental constraints.

Question 15: Transport

- Do you have any views on the considerations set out above? In particular:
  - If urban extensions are needed, do you think there are any areas we should be prioritising in terms of accessibility and wider transport implications?
  - Do you believe Plan:MK should be seeking to extend the grid road pattern into any new development no matter what the cost?
  - Do you have any views on realistic innovative transport solutions to support growth?
  - What are your thoughts on how we can encourage cyclists to use the Redway network?
What members of the public said:

The public generally supported the retention and expansion of grid roads, although one individual was strongly against them and advocated their conversion to city streets on all but the key routes. Others suggested reviving the possibility of a monorail system in the city, stressed the importance of synchronised public transport to ensure reliable links between different forms or advocated the clustering of certain use-classes to minimise daily travel. A new motorway junction was also a commonly cited priority. The flaw with the existing redway network was said to be the fact it was based on leisure trips and should be made more direct to accommodate commuting or other trips.

What Town and Parish Councils said:

Town and Parish Councils supported the retention and expansion of the grid road system.

What Ward Councillors said:

Councillors supported the retention and expansion of the grid road system. They also suggested that electric car usage could be encouraged by ensuring all homes had specific parking for such vehicles.

What Milton Keynes Council departments said:

Highways engineers commented that urban extensions would generally discourage sustainable travel as buses seem unattractive when they have to take a prolonged into the city centre. The exception to this would be extensions in the vicinity of existing train stations. Another team commented that expenditure on grid roads should not compromise the ability of developments to deliver other infrastructure.

What neighbouring and other local authorities said:

Buckinghamshire County Council considered MKC’s sustainable transport provision on the Aylesbury Vale border to be proactive and highlighted the need for ongoing discussions as potential development sites progressed.

What the industry said (e.g. landowners, developers, agents...):

The development industry was polarised in terms of support for the grid road system. Some considered it to be a defining characteristic of the city that brought people to live here, others believed it was too expensive to roll-out into new development sites.

What national/statutory organisations said:

The Highways Agency said that Plan:MK should use up to date transport evidence to test any emerging proposals. In particularly the impact on jobs growth on increasing the relative levels of internal trips and trips from the surrounding area.

What local organisations/interest groups said:

Local groups suggested that not enough was known about the future to rule out any particular transport solutions.
Question 16: Retail and Leisure

- Do you think that the existing retail hierarchy is fit for purpose or does it need amending? If so, how should it change?
- How do you think the role of CMK as a regional centre is best protected and enhanced?
- Should we be seeking to limit the trend towards increased size of retail stores in local centres to protect their roles?
- Are there any issues relating to retail and leisure that you think we should be taking into account in developing the overall development strategy?

What members of the public said:

Plan:MK should encourage CMK to be a district/local centre, not just a regional centre. This is particularly important given that many of the residents in estates surrounding the city centre cannot afford to shop at CMK and there is no supermarket serving them. CMK should also serve as a sense of pride and civic belonging of all those who live in the wider Milton Keynes area. This role is in danger of eroding if additional alternative centres are developed. The public also highlighted the role of the ‘super-diverse’ city in encouraging Black & Minority Ethnic groups to set up retailing and entrepreneurial businesses, which may seem ‘invisible’ but should be taken account in developing the strategy for Plan:MK. Provision of multi-storey car parking in CMK should be extended to enhance its role.

What Town and Parish Councils said:

Parish Councils said that there should be an appropriate mix of convenience stores in local centres and that larger stores should only be located in District centres. CMK Town Council suggested the lack of a supermarket in CMK was a failure in planning that Plan:MK should address.

What Ward Councillors said:

The one Councillor that responded suggested that the categorisation of the current retail hierarchy was unclear and that the most accurate way of representing things were to use hub and satellite terminology. They also suggested that although the city centre deserved a bigger share of future retail growth, this currently seemed disproportionate compared to other town and district centres. They considered that Plan:MK should incorporate ‘targets’ for CMK at a very detailed level, with things like dwell times, visitor numbers, travel distance and modal splits all specified. The desirable land allocations in CMK should be reviewed, with the expectation that not everything would be able to be accommodated and so room should be found elsewhere. These uses included a central business district, civic hub, retail hub, commercial leisure hub, cultural hub, third sector hub, hotel area, transport hub, residential, education, sport, park and local retail needs. In terms of the regional retail offer, the indoor experience is MK’s biggest differentiating attribute and should be retained and enhanced through Plan:MK.

What Milton Keynes Council departments said:
One team considered that the current retail hierarchy is working and that whilst developing alternative centres like MK1 has been successful, if the economy was to experience another downturn, it is unlikely that continuing to challenge the established centres would be viable. CMK’s role as a regional centre could be protected and enhanced by improving its connectivity to public transport. When considering plans submitted, there should be careful attention paid to their ability to be integrated into existing local centres without affecting other businesses and avoiding displacement.

What the industry said (e.g. landowners, developers, agents...):

The development industry suggested that new retail developments like MK1 have been important catalysts in regeneration. The ambition of MK being an International Sporting City has the potential to provide the same regenerative benefits. Others suggested that the size of retail stores in local centres should be restricted but new facilities of an appropriate scale to be included in larger urban extensions.

Others suggested that a mix of uses was key to the success of CMK but that further large-scale development incorporating mixed uses could see the city centre become oversaturated. Emerging policy should therefore recognise that different parts of the centre have their own character and make their own contribution to the vitality of the centre as a whole. Alternative views included the need for expansion to ‘consolidate and better integrate’ the offer within the Primary Shopping Area.

The development strategy in general should be informed by wider financial climate and recognise the fact that town centre investment is not a light undertaking - commercial developers therefore need a strong and committed policy context to support the growth strategy that is desired.

Another developer suggested that in order to sustainably support facilities in CMK, residential development that will accommodate those with disposable income should be located on sustainable transport routes into the city centre.

What local organisations/interest groups said:

Local organisations said that increased variety of small units will naturally lead to greater usage. They also indicated that all shopping centres (local or central) need to be places people enjoy going to for non-shopping purposes too. The Parks Trust suggested Plan:MK should enhance the role of Campbell Park to complement CMK as a destination.

Question 17: Flexibility of Uses

- Would you support a more flexible use of undeveloped employment sites to meet unforeseen needs emerging in the future?
- If so, would you prefer a general criteria based policy covering all sites, or would a more site specific approach be appropriate?

What members of the public said:

One member of the public said that flexible uses of undeveloped sites should be supported where it can be demonstrated they are surplus to planned need.
What Town and Parish Councils said:

One Parish Council said a site-specific approach should be used when considering flexible uses.

What Ward Councillors said:

One Councillor said that a review of allocated employment land could take place, provided it was done with an open mind. Until such evidence is available it would be inappropriate to make any alternative allocations.

What Milton Keynes Council departments said:

One Council team supported the flexible use of undeveloped employment sites provided there were safeguards to maintain 1.5 jobs per dwelling. They also considered that policies should be site-specific to reflect the variety in the characteristics of sites.

What the industry said (e.g. landowners, developers, agents...):

The development industry was split depending on the nature of their particular interests. Those that held vacant or underused employment sites naturally supported flexibility in changing their use. Others highlighted that ‘fitness for purpose’ should be a key consideration of the EGELS. Those that have interests in large edge-of-settlement greenfield sites did not support the flexible reallocation of existing employment sites. They pointed towards the NPPF and the economic constituent of ‘sustainable development’ - any flexible use therefore needs to be part of the wider strategic vision and not just piecemeal reallocations. In this regard one developer suggested flexible changes of use should be encouraged where it increases people-density along key routes and transport corridors.

What local organisations/interest groups said:

Local organisations generally supported flexibility in changing employment uses, provided they have been redundant for a substantial period of time. They favoured a site-specific approach so that a locality’s particular needs could be addressed without widespread loss of employment land. The Council of Faiths supported flexible use with specific reference to bringing forward community uses and places of worship.

Question 18: Reserve Sites

- Do you have any views on the future of community reserve sites?

What members of the public said:

The one member of the public that responded said that the future of reserve sites should be considered in terms of recent proposals for their use. They highlighted religious uses, and their particular requirements as being particularly influential in planning future reserve sites.

What Town and Parish Councils said:

One Parish Council responded saying that reserve sites should be used for their original community purposes and not for housing.
What Ward Councillors said:

One Ward Councillor responded saying that reserve sites do not currently seem to be working and therefore a review would be supported.

What Milton Keynes Council departments said:

The infrastructure team suggested that residents quickly become accustomed to reserve sites being open space and therefore any redevelopment often lacks support. Therefore in future, Plan:MK should consider fewer but larger reserve sites with good access away from existing housing. Signage to indicate their potential redevelopment would also be beneficial.

What the industry said (e.g. landowners, developers, agents...):

The development industry supported the flexibility of reserve sites in new developments and said they would perhaps be best provided as part of local centres or adjacent to schools.

What local organisations/interest groups said:

The Council of Faiths said that existing reserve sites are often too small to be effective. These could be released for housing provided alternative provision is made. They supported fewer but bigger new reserve sites. They also advocated the transferral of reserve sites to MKC as the Community Foundation only offers 125 years lease (with many religious groups requiring freehold for investment) with minimal discount (due to assumed residential land value). A local society said reserve sites should be located in and around local centres and that a provision of 0.75Ha per 1000 population remained appropriate.
14 Other Comments Received

As part of the engagement programme for the Plan:MK Topic Papers, Officers held a series of drop-in sessions in locations around the Borough, as a way to talk to members of the public and other stakeholders about the plan and the consultation period.

This section sets out the responses we received through those sessions, including comments that were made on post-it notes or comments cards at our drop-in sessions; raised in conversation with officers; made as comments at presentations; or as tweets to the @MKCouncil twitter address.

Drop-in sessions comments

- The 2013 Core Strategy should be adhered to, except where it can be shown its policies won’t hold until 2031.
- Woburn Sands has already been developed to its maximum capacity. This obviously includes any possible developments next to Woburn Sands because people there would use the facilities in Woburn Sands.
- Some of the possible development sites are within the area covered by the Woburn Sands Neighbourhood Plan and are therefore impossible because MKC agreed the Neighbourhood Plan.
- The Point should not be knocked down. They should give it a refurb and make it a place for the younger generations to hang, or they could make it into a café so we are able to chill.
- Keep The Point
- An idea I have had is in Wescroft or any different place, there needs more places for young people to go and be able to chill out
- A place to go when it’s cold where we won’t get kicked out and its open to chill, that’s free for teenagers in Westcroft.
- Expansion of Westcroft Park into greenery around. Also make the point more appealing and advertise what is going on.
- More bike racks, e.g. at the Stadium. I use the redways a lot, but difficult if you can’t leave your bike somewhere safe when you get there. Make sure bike racks are included in planning permissions
- New A5 roundabout - lanes unclear at Bow Brickhill
- More small schools for KS1 please (like Glastonbury Thorn).
- Keep the library - it’s great. If possible create new branches with more books in minority languages for bilingual education
- Keep the library
- More toy shops
- Make more playgrounds everywhere people’s homes are
- Homes with basements
- Fit solar panels on all new build
- Links to more projects on the website (e.g. Kingston Roundabout)
- What is happening at the National Bowl?
- If H6 will be upgraded to dual carriageway. Traffic problems travelling from Oxley Park
- Is there to be dualling of Dansteed Way? Increase in traffic from Western Development into CMK
What is happening as far as schools (new schools) for the western flank development, i.e. timescales?

Responses to Topic Paper questions

The following comments were added as bullet points in response to some questions from the Topic Papers which were printed on A3 sheets and displayed in the Plan:MK pop-up shop.

Do you think the Council should find ways to support self- and custom-build housing? Should we allocate sites where we would expect development to take the form of self-build?

- House boats. Make more use of the lakes for attractive housing
- Not all self-build is like ‘Grand Designs’. We need plots of different sizes
- Self-build only benefits people who would be resourceful enough to find a plot anyway. They don’t need support.

What would encourage people to use public transport for more journeys? What could the planning system do to make public transport more attractive?

- People will want to travel. Are you upgrading the train service to London too? some already run at 160% capacity
- Fast, free, low/cost. Reliable. Efficient
- People want to use the car. Difficult to get people into buses
- People consider railway extension or light railway extension to Stadium MK and associated shops. Bletchley Train Station is 25 minutes walk and too far
- Improve rail link to London. Virgin 30min service good, but very overcrowded. Buses take too long to get anywhere. Options - tram system? Fast bus making less stops to key places, e.g. station, shops, StadiumMK, Tesco/Asda/Ikea etc
- Reliability and cost. The buses don’t gurn up, are uncomfortable and smell terrible. If you had express buses that don’t stop everywhere and you made the journey free if they are late
- Access to train station is getting worse. More parking. Virgin trains??
- Plan for infrastructure improvements (e.g. roundabout/pinch points)
- Bus service should be every 15 minutes from every estate

What are the key principles or goals that future development in the Borough should be aiming to achieve?

- Need more suitable retirement housing - distinct from care or nursing homes
- To encourage the community of MK - encourage more independent shops/bars/restaurants other than just the chains
- To help the balance of green space and ensure when new sites are allocated there is space between old and new
- The principles of beautiful natural green space are being eroded. The areas of new development have a far lower percentage of green space. Restore the principles MK was built on
- Maintain green areas at all cost. The beauty of MK is town and greenery mix whilst within good commute time to London. Don’t allow green areas to be given over to housing. Once they go we will never get them back.
• It’ll never happen but get rid of this awful private shopping centre and create a proper high street with room for small businesses.
• Do not impinge on grid road corridors. Maintain character
• Need to firmly establish the key principles - and follow them through (e.g. linear parks, city boundary)
• Stop harking back to the past and think like the big city we are. We need high rise CMK and knock down old spread out estates like Bradville that make poor use of valuable land.

How should the Council plan pro-actively to meet the needs of businesses and support an economy fit for the 21st Century? How can we encourage the growth of homeworking in the Borough?

• Warehouse/logistics important. Provide jobs for low skilled local residents - opportunities to grow
• Can there be less CMK focus?

Do you think there is a case for further urban expansion areas? If so, where do you think these should be planned, and why? Do you have any thoughts on how they can be planned innovatively? What do you think about a standalone settlement, somewhere around MK?

• Think about the benefits that new estates can bring to older areas. E.g. open space, shops etc will improve the attractiveness of Fullers Slade)
• Yes its inevitable, but actually natural growth would be better
• Make sure they are planned comprehensively, like the Western Expansion Area

Should Plan:MK seek to extend the grid road pattern into new development areas, no matter what the cost? How can Plan:MK encourage cyclists to use the Redway network?

• We should keep the grid system as MK is known for that. Plus the MK feel/identity will there, as opposed to Wolverton, Bletchley, Newport Pagnell and Stony Stratford, which have remained separate market towns.
• Extend grid roads providing they are safe and do not result in car dominated places
• Is the health infrastructure able to cope with the city’s growth?
• Grid roads are a signature of MK and keep it moving - keep and extend them
• Retain grid system and estate feel. More redways
• Definitely keep the grid road - part of the identity of MK but also easy to get around, avoid traffic etc.
• Grid roads keep us moving so yes, no more of the nonsense you see over out on the Eastern Flank.
• Keep and extend the grid road system - no more Countess Ways!
• Try and make the redways safer - cameras? Patrols/greater presence of police?
• More cycle racks at destinations
• Repair the cycleways. Some haven’t been repaired for years. It can’t cost a great deal

What vision should we have for the city centre in the future? What type of shops, facilities and activities would you want to see here? Should the Council be more pro-active in supporting and facilitating town centre regeneration initiatives in Bletchley and Wolverton?
More Council Housing for people to rent.
A tourist board
Make more use of specific attributes of centres, e.g. Bletchley rail station tourism to Bletchley Park.
Bletchley town centre needs regeneration. Improve mix of uses - feels unsafe at times
Not all of us have cars, please could we have pavements? What is happening with the high street in Bletchley?
Encourage café culture in Bletchley
Centres need identity - CMK shouldn’t just be a shopping centre
Design - shopping centre is the city centre. Needs more
Maybe have one section that is dedicated to ‘local’ shops/trade/business and not just chain stores - give local shops a chance to see local produce/items in an area with high footfall. Could give cheaper rent for first 12 months to help them start?
Bletchley needs a trigger for regeneration. Through road?
Knock down this awful glass box that gets locked at night and let’s have a proper high street.
Bletchley centre - London Plains trees should be removed and replaced with smaller trees
Queensway - open up both ends of the road

What level of affordable housing should we be seeking? Should affordable housing be seen as a priority above other sorts of ‘infrastructure’? what do you think are the most important elements of infrastructure to fund?

- Yes! MK is one of the most expensive cities - its commuter town status impacts property prices
- £200k for 2-bed houses is too much
- Affordable housing is needed, but “affordable” ie 80% of market rent is not economically viable for low income families. Some private rents are cheaper
- Cost of housing is too high. Access to mortgages is restricted

How do you think the need for smaller properties should be addressed? Should the Council be looking to identify sites where a higher concentration of smaller homes could be provided?

- More suitable small housing to all people to downsized to give young people a start on the housing ladder. It has to be well-priced.
- Stop building houses on small plots. Double garage and garage (drive?) is what we want
- Don’t we need family homes? But affordable for people on lower incomes.
- Yes - rooms in HiMOS are needed. Far too few of these locally. We need more shared houses

Do you think we should continue to try and maintain the original principles and design characteristics in new development? How should the policies promote or reinforce local distinctiveness?

- New estates should be lower density - to reflect the older estates
- New housing estates need to include lots of open green space
- Make more of specific centres in identifying MK i.e. make attributes/benefits of other areas known
We should try to keep to the local vernacular. The properties at Stratford Park should have been a proper extension of Victorian Wolverton for example.
Yes, but keep the green feel to the city which helps city people to love their city.
Roads are too tight and too many bends - makes it difficult to drive round. We need wider roads in estates.
Keep the green spaces and redways
Keep and extend the grid roads
Design of new estates not attractive. Over-looking etc… need better design
No more trendy award winning designs. Cheap, nasty panelling, flat roofs and mono-pitches do not stand the test of time. There is a reason houses have been built the same way for 400 years!

How could regeneration be supported through the Development Strategy in Plan:MK?

Focus on redevelopment first
Any plans for physical regeneration need to be in the plan, but need to ensure this isn’t just gentrification in disguise. Affordable options need to be in the mix
Encourage redevelopment before building on greenfields
Old CMK buildings need to be redeveloped, e.g. food centre
Consider the impact of new expansion areas on regeneration and attractiveness of adjacent areas
There is scant detail to answer this question and staff seem to have little guidance to offer on this.
Regeneration may equal higher densities, smaller properties and gardens, flats not houses - plans need to be specific on these issues to ensure residents are aware/informed.
Why not redevelop derelict space? E.g. opposite Sainsburys at the Hub, and the old Garden Centre opposite Xscape

What is missing, culturally, from Milton Keynes? What could Plan:MK do to promote Milton Keynes as internationally and culturally significant?

More spaces for small businesses and creative industry - enable innovation and creativity
Better marketing for culture and more big events
Secure funding through planning gain to fund culture. We need to ensure culture can continue and money available
MK should have an F1 street race
Multi-use, flexible spaces for community activity, arts and events
Diversity in retail. Non-chain retailers. Encourage pop-up shops etc
Need for personality.
Mix of uses in the centre
School in CMK needed - Campbell Park in particular.

How can Plan:MK help to ensure that sport and leisure opportunities are realised? How can Plan:MK help to ensure that appropriate community facilities are provided and that existing facilities are protected?

Need for covered tennis courts in Milton Keynes - only David Lloyd - private and not accessible. MK tennis club trying to get some
• Actually engage with the grass-roots community groups. Current facilities are overused (and abused) by playgroups preventing diversity of community groups
• Designate Skate Parks/BMX parks outside of residential areas as this could bring anti-social behaviour to residential areas (i.e. proposal near Oakridge Park)
• Don’t build on any more allotments or playing fields
• Why not build the university campus in/around Campbell Park? Close to bars and restaurants in CMK
• Keep noisy play areas away from housing to prevent local antipathy
• Instead of just having a green desert of playing fields, let’s have more woodland for active play, dog walking, etc. Might lead to less mowing as well!

How can we ensure new developments contribute to improving the health and well-being of residents?

• Need for improved service for residents i.e. those services only provided in CMK

Are there any areas where you think we should avoid expansion?

• On the green belts, Ouzel Valley Park and the allocated parkland common land
• Is there going to be any development around Newport Pagnell?

Tweets from @mkcouncil with responses

The Council’s @mkcouncil twitter account was used to publicise details of the consultation, to encourage people to come along to the pop-up shop or other drop-in sessions, and to raise awareness of the topic paper consultation. More than 35 tweets were published as part of the consultation, on the following dates. Where a conversation took place in response to one of the tweets, this is also set out below.

Alerts tweeted from @mkcouncil on the following dates

• September 9th
• September 17th x3
• October 1st x3
• October 7th x2
• October 17th
• October 21st x10
• October 22nd x2
• October 23rd
• October 28th x3
• November 10th x6
• November 25th
• December 1st x2

Responses/conversations to the following messages

9th September 2014

MK Council @mkcouncil

Get ready to think about how you would plan for the future of MK - your chance to get involved starts this week #Plan:MK
@MKWUG1

@mkcouncil Don’t forget the wheelchair users that need accessible homes & increasing older ppl need accessible homes too in increasing nos.

7th October 2014

MK Council @mkcouncil

How many homes and jobs do you think MK should create in the next 20 years? Tell us now - visit http://www.milton-keynes.gov.uk/planning-and-building/planning-policy/plan-mk ...

Louis Black @LouisBlack

Isn’t that the kind of thing we pay you to work out for us?

21st October 2014

MK Council @mkcouncil

Come and chat to the The Plan:MK team in their pop-up shop in centre:mk (between Blott & Hawes and Curtis) on Weds 22 Oct 11am-3pm. #planmk

Richard Cousins @rwjc22

@mkcouncil Any more dates to be announced?

MK Council @mkcouncil

@rwjc22 Yes -there’s a long list of dates! I’ll be putting them up here over the next 30 mins :-) 

22nd October 2014

MK Council @mkcouncil

Our Plan:MK pop-up shop is open today in the centre:mk until 3pm - we welcome your comments about the MK future

evolution @liveevolution

@mkcouncil is it only open today?

MK Council @mkcouncil

@liveevolution No - it’s also open 25 Oct, 28 Oct, 30 Oct, 1 Nov, 3 Nov, 5 Nov and & 7 Nov all from 11am until 3pm.

evolution @liveevolution

@mkcouncil @liveevolution Thanks we will pop in to the pop up!

28th October 2014
MK Council @mkcouncil

Plan:MK drop in session for Woburn Sands on Monday 17th November at the Memorial Hall, High Street, Woburn Sands 11am - 3pm #planmk

Richard Cousins @rwjc22 Nov 17

@mkcouncil Not impressed by this. Went along yesterday. No large maps of the proposed extensions to MK. A sly way to get plan approved?

MK Council @mkcouncil

@rwjc22 There are no proposed extensions at this stage. How and where they might be is part of this first consultation.

@rwjc22 ...Drop us an email at planmk@milton-keynes.gov.uk and we can explain more.
### 15 Abbreviations

<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>AVDC</td>
<td>Aylesbury Vale District Council</td>
</tr>
<tr>
<td>BAME/BME</td>
<td>Black and Minority Ethnic</td>
</tr>
<tr>
<td>CIL</td>
<td>Community Infrastructure Levy</td>
</tr>
<tr>
<td>CPO</td>
<td>Compulsory Purchase Order</td>
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<tr>
<td>DCLG</td>
<td>Department for Communities and Local Government</td>
</tr>
<tr>
<td>dpa</td>
<td>Dwellings per annum</td>
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<tr>
<td>dph</td>
<td>Dwellings per hectare</td>
</tr>
<tr>
<td>DtC</td>
<td>Duty to Cooperate</td>
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<tr>
<td>EEA</td>
<td>Eastern Expansion Area</td>
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<tr>
<td>EGELS</td>
<td>Economic Growth and Employment Land Study</td>
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<tr>
<td>GI</td>
<td>Green Infrastructure</td>
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<tr>
<td>GPDO</td>
<td>General Permitted Development Order</td>
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<tr>
<td>HiMOS</td>
<td>Housing in Multiple Occupation</td>
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<tr>
<td>HMA</td>
<td>Housing Market Area</td>
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<tr>
<td>HS2</td>
<td>High Speed 2</td>
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<tr>
<td>ISC</td>
<td>International Sporting City</td>
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<tr>
<td>MKDC</td>
<td>Milton Keynes Development Corporation</td>
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<tr>
<td>MKDP</td>
<td>Milton Keynes Development Partnership</td>
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<tr>
<td>MOU</td>
<td>Memorandum of Understanding</td>
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<td>MSCP</td>
<td>Multi-storey Car Park</td>
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<td>NEP</td>
<td>Natural Environment Partnership</td>
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<tr>
<td>NPPF</td>
<td>National Planning Policy Framework</td>
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<td>ONS</td>
<td>Office for National Statistics</td>
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<td>PPG</td>
<td>Planning Policy Guidance</td>
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<tr>
<td>PSA</td>
<td>Primary Shopping Area</td>
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<tr>
<td>RTPI</td>
<td>Real-Time Passenger Information</td>
</tr>
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<td>S106</td>
<td>Section 106</td>
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</tbody>
</table>
15 Abbreviations

SHMA - Strategic Housing Market Assessment
SITS - Sustainable Integrated Transport Study
SLA - Strategic Land Allocation
SNPP - Subnational Population Projection
SPD - Supplementary Planning Document
SSSIs - Sites of Special Scientific Interest
WEA - Western Expansion Area