

Draft Social Infrastructure Planning Obligations document: Comments received and officer comments

ANNEX A TO ITEM 9

General –Role of MK Partnership and their planning tariff, or roof tax.

Respondent	Representations	Council Response
1) Councillor Holroyd, Genesis Land Ltd and Genesis Holdings Ltd (represented by Pegasus), Westbury Homes (Represented by DLA), Bucks County Council, Gallagher Estates Ltd and Taylor Woodrow Developments represented by Wood Frampton	How does this relate to the 'roof tax' and how will it be integrated into the workings of MK Partnership?	<p>The draft document, along with other adopted SPG was used by MK Partnership to identify the types of infrastructure that would be required to ensure successful growth of Milton Keynes. MKP appears to have agreed with all owners/developers of land in the expansion areas (represented by MK Forward) on a flat charge per dwelling and per hectare of employment land. If signed off by ODPM, then this approach will be applicable to areas where MKP gives planning permission. The 'tariff' replaces the usual S.106 negotiation and includes provision for items identified in the Council's SPGs. No additional S.106 contributions will be sought. Where the tariff is being applied there will not be a negotiation that takes into account the social infrastructure SPD or any other SPG.</p> <p>Amend SPD to take into account the proposed MKP tariff and that where the site is covered by this agreement that the SPD does not apply.</p>

General

Respondent	Representations	Council Response
2) RPS	The policy component needs to be clearly stated to assist its use and application	It is considered that sufficient information on the policy background for the type of contributions sought has been provided.
3) RPS	Services and facilities that would normally be funded through national or local taxation and revenue streams once operational should be excluded from the "shopping list". These include universities, promotion of inward investment and children's homes.	The types of facilities identified in the SPD will be needed to create sustainable communities and the level of contribution reasonably related to the impact of proposed developments.
4) RPS	Contributions should be considered against the impact of the development. This will often not apply on a citywide basis.	See answer to 3).
5) RPS	Some issues are approximately dealt with at a district wide level, whereas others (eg library needs, health facilities) should be more appropriately considered at a local level and not through a tariff approach.	Obligations sought will have to be consistent with national guidance. Nevertheless, both health and libraries have a local and strategic component to their delivery, which the document has attempted to highlight and incorporate.
6) RPS	Difference between capital works and on-going revenue costs should be clearly stated and the latter excluded from potential contributions sought. Only exceptionally would a contribution towards start-up revenue costs be	The majority of the contributions sought are for capital costs; nevertheless revenue is sought for some items. Circular 5/2005 has slightly amended the approach towards contributions for revenue items. Nevertheless the items sought in the document are considered consistent with the

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	considered.	guidance. This could be made clearer within the document.
7) RPS	Land included in calculations should be transferred at nominal cost and the tariffs should not assume full development value that pushes up the costs.	This has been the case where it is expected that the site will be delivered as part of a S.106 agreement or identified within the Local Plan for the proposed use.
8) Terence O'Rourke	Progressing the SPG is premature prior to the revised Planning Obligations Circular being printed this summer.	National Planning Guidance is continually being revised. Since the draft document was issued Circular 5/2005 has been issued and the final version of the document will be consistent with this. However, there is still uncertainty about the timescales for the Government' s proposed optional planning charge and the Barker development land tax. It is accepted that these documents could override the advice contained in the final version of the document.
8) Terence O'Rourke	Under the present Circular the SPG should provide guidance only and not be prescriptive. We would therefore expect to be able to negotiate obligations relevant and necessary to any particular development as appropriate.	Circular 5/2005 now allows the Council to give indicative levels of contributions likely to be sought. However, it is recognised that the characteristics of the development will need to be taken into account when identifying the level of contribution sought.
9) White Young Green	The draft SPG gives no reference to the geographical area it covers, it would appear from the preamble it is not intended to cover Central Milton Keynes.	The document covers the whole borough, except for Central Milton Keynes. This could be made clearer in the text. Amend text to include reference to fact that the contribution covers all areas of the Borough, with the exception of CMK.
10) White Young Green	If the guidance covers Central Milton Keynes it will stymie development, any attempt to harmonise contributions across the borough would have this effect.	The draft stated that it would not apply to CMK, which has its own planning obligations guidance. The level of contributions sought within CMK will be assessed this year, and if necessary revised SPD for CMK will be issued.
11) White Young Green	The draft SPG appears to only relate to residential development – clarification is sought.	The guidance could be clearer on which types of development contribute to which type of infrastructure. In order to increase consistency with the MKP tariff, the document should be amended to seek a contribution from business developments to which includes contributions from business land development to items such as Higher Education, Inward Investment and the Voluntary Sector. A contribution is also sought to CCTV where appropriate. Amend text to give clear indication about which contributions will apply to which types of development.
12) White Young Green	The draft SPG does not set any minimum thresholds for the size of development to which it will apply, unlike the CMK SPG.	Other adopted planning obligations SPG do state that they will only apply to 10 or more dwellings. For consistency it would be sensible to apply the same threshold. For business developments, a site size of 1 hectare which would exclude the majority Amend text to state that the document applies to sites of 10 dwellings or more, or business

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		developments of 1 hectare or more.
13) Culture South East – Government Office for the South East	Welcome proposals for pooling contributions to facilitate off site provision and community led initiatives as some of this provision will serve Milton Keynes as a whole and some will serve a locality neighbourhood or development.	Noted. The new Circular 5/05 allows the pooling of contributions to take place.
14) Age Concern	Main omissions throughout the document are services for rural areas and transport and wish to see more robust service plans in the final version.	The document provides advice on developer contributions. As most of the development will occur within or adjacent to the urban area, the majority of the contributions sought will focus on urban solutions. Policies within the local plan should mean that the facilities for which contributions are sought shall be located in areas that are easily accessible by public transport. The document does not need to repeat service plans, but will make reference to them or items of infrastructure contained within them where necessary.
15) Councillor Holroyd	Since the draft SPG only deals with part of what developers will pay how will a final integrated and proportionate level of contribution be identified covering all obligations.	There are now a number of pieces of guidance that will apply to housing developments. Therefore it would be useful for the document to contain reference to other SPG that have been adopted. Amend document to contain reference to other adopted SPG.
16) Bucks County Council	Presumably other planning obligations for affordable housing, transport and green infrastructure are sought in other SPG/policies?	See response to 15).
17) Councillor Holroyd	The 'per dwelling' figure is presumably an adjustable average; otherwise a development of small dwellings might have a disproportionately high contribution. Some of the headings do not have a 'per dwelling' contribution included which would be preferable to negotiating on an ad-hoc basis.	The figures are an average. For some items a per person figure has also been applied to the level of contribution sought to take into account range of housing sizes and reflect the impact of the development. Wherever possible this can be increased. Amend document where possible to provide a breakdown by person as well as property
18) MK Partnership	It would be useful for the document to reference how it sits with other policies and guidance, for instance the health and voluntary sector requirements in the adopted Oakgrove Millennium Community SPG differ from that set out in this draft. How will the apparent inconsistencies be dealt with?	The information contained within this document provides the most up to date thinking of the service providers. In some cases it will supersede elements of site specific SPG. Officers will seek to resolve these differences through negotiation with the site owners to reach a satisfactory outcome for them, the occupants of the buildings and the service providers.
19) House Builders Federation, Bellway Homes	It is helpful to have advice in advance on what precise costs associated with bringing forward development sites, it is not helpful for these costs to be continually increasing and the details to be set out in a variety of documents, some of which overlap e.g. with regards to education contributions.	The scope of what is regarded as being acceptable for S.106 obligations to cover has expanded over the years. Circular 5/2005 has not sought to fundamentally change the tests, so it would appear that government is generally happy with the level and type of contributions being sought from development. See response to Councillor Holroyd above about assisting developers in identifying the SPG that might be of

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		relevance.
20) House Builders Federation	The HBF has commented on various previous SPGs, much of what is sought is inadequately justified and is little more than the Council seeking to apply an arbitrary tax on development to provide a wish list of facilities, amenities and services, which should be provided from the public purse.	Noted, see response to 3).
21) House Builders Federation & Bellway Homes	Despite stating that negotiations on S.106 will take into account advice in Circular 1/97 the rest of the SPG goes on to allocate precise costs in advance and sets blanket requirements arriving at costs per dwelling, regardless of the precise nature of the obligation sought.	The approach the Council has taken is considered to be consistent with the new Circular 05/2005 which replaces Circular 1/97. This allows Councils to give an indication of the level of contribution that will be sought.
22) House Builders Federation	There is only one solution put forward to any infrastructure deficit, with no solution proposed other than new build. There is no justification to tie in the contribution sought to developments likely to come forward.	The main reason for this is budgets. Alternative solutions would be more dependent on revenue budgets, having more immediate impacts on the budgets of the organisations providing the services.
23) House Builders Federation & Bellway Homes	This tax on development simply cannot be justified under the provisions of current legislation and guidance and this draft must be withdrawn.	The contributions sought are to provide infrastructure that will be required to serve the needs of the population that will live in new housing developments.
24) House Builders Federation & Bellway Homes	There should be a consolidated version of all the SPG to assist developers.	It is the intention of the Council, once the Transport Infrastructure SPD has been produced the Council will review planning obligations guidance and consolidate it into one document.
25) Fairview Homes (represented by RPS Group)	Taking into account existing Government guidance, it is unreasonable to seek financial contributions towards education, leisure and the community and social care that are not directly related to the proposed development.	It is acknowledged that the level of some contributions will be altered to reflect the composition of the housing scheme, this is already done for instance in relation to older person's housing and playing fields, or one bed room dwellings and contributions to schools. The document has been altered to seek contributions on the basis of occupation. See response 34) to strategic approach to type of obligations sought.
26) Fairview Homes (represented by RPS Group)	It would be premature to adopt the SPG prior to new Government guidance and the Local Plan being adopted.	See response to 21) above in relation to government guidance. The document provides further guidance on policies that seek planning obligations that are within the adopted plan. There is therefore no need to wait until the replacement plan is adopted.
27) Fairview Homes (represented by RPS Group)	We object to a financial contribution towards crematorium/burial grounds, community houses, museums and archives, public art and waste management. Any requirement must be fairly and reasonably related to the development, these items are considered to represent a development tax or betterment levy.	The facilities will be provided to meet the needs of the growth in population caused by the provision of new dwellings. The level of contribution sought has been reasonably related to the impact of new development in generating the need for the facility.
28) Brooklands and	There needs to be consistency	This is agreed and the discrepancies were a

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Glebe Land, Hallam Land Management, William Davis Ltd, Gazeley Properties Ltd, Land Securities and TGR Williams and Sons Westbury Homes (represented by DLA), Bucks County Council	throughout the document on the number of dwellings used in calculations. It would be helpful if consistent population estimates for households are used throughout.	product of gathering information from a number of sources. Amend document to use a consistent number of dwellings to be built to the period 2016.
29) Gallagher Estates Ltd and Taylor Woodrow Developments represented by Wood Frampton	The use of 31,163 dwellings to calculate the figures needs justification. Much has already been permitted and thus the ability to gain contribution from these sites has been lost. How does it relate to the 16,000 dwellings used in MKPC tariff negotiations?	This is the number of dwellings to be developed for the period 2001-2016 taking into account completions to 2004. Whilst the ability to attain some of the contributions sought in the document will have passed, dividing the contribution sought by this number of dwellings ensures that the contribution per dwelling is equitable. MKP have used the figure of 15,000 dwellings as this is what it is assumed will be built in the Urban Development Area in which they issue planning permissions.
30) Brooklands and Glebe Land, Hallam Land Management, William Davis Ltd, Gazeley Properties Ltd, Land Securities and TGR Williams and Sons Westbury Homes (represented by DLA)	More information is needed on the processes for the procurement and payment for contributions. It also needs to address phased payments over time that are related to defined dates or trigger points.	Procurement of the infrastructure and the timing of payments is something that needs some further work. The MKP tariff, with its ability to forward fund infrastructure in the knowledge that payment will be received from development is a model that the Council could adopt. This approach is consistent with Circular 5/2005.
31) Brooklands and Glebe Land, Hallam Land Management, William Davis Ltd, Gazeley Properties Ltd, Land Securities and TGR Williams and Sons Westbury Homes (represented by DLA)	It fails to deal with the issue of cost recovery/credit notes if for instance facilities are provided within a development. Specific reference should be included to show that developers won't effectively have pay twice for a facility.	The draft does make reference to provision of facilities on site in paragraph 1.3.2. However, guidance on how this will be counted against the contribution as a whole that is sought off a developer would be a useful addition. Add reference to on site provision of facilities and how this could be related to overall level of planning contribution.
32) Bucks County Council	Helpful if a timetable was included for review and when it will be taken forward as SPD under the Planning & Compulsory Purchase Act.	This information could be included within the document although the timescale at this stage will be more than indicative. Add reference to process of reviewing the document and consolidating it into SPD.
33) Bucks County Council	The draft says that it does not seek a fixed contribution and that figures will be indexed – yet precise figures are referred to in Part 2, this requires further clarification.	This was to reflect advice in Circular 1/97, which appeared to not be supportive of setting out costs of contributions in advance. The costs identified are an average per dwelling, the individual circumstances of each development still have to be taken into account and the contribution altered accordingly. Circular 05/2005 allows costs to be set out in advance.
34) Genesis Land Ltd and Genesis Holdings	The key concern is that the contributions sought go beyond what may be regarded	When compared to other parts of the country, the types of contributions sought might not be

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Ltd (represented by Pegasus)	<p>as legitimate in terms of current national planning advice set out in Circular 1/97, in particular in relation to the tests of necessity, relevance to planning and direct relationship to the proposed development.</p> <p>Circular 1/97 states ' Authorities should be particularly careful to guard against attempting to secure a list or range of desirable benefits from developers, even if in some way they consider such benefits to be related in some way to the proposed development.' Yet that is precisely what appears to be happening in this draft SPG.</p>	<p>regarded as typical. Nevertheless, the amount of development proposed for MK and the need to create sustainable communities means that there has to be a holistic approach to providing the facilities that will be needed by the tens of thousands of people that will live in the new houses. The approach has to be different to that followed in an area where development is either infill, or small scale and therefore can potentially take advantage of existing social infrastructure. The items sought within the Council's document are consistent with those contained within the MKP tariff agreement. Whilst the guidance on S.106 contributions means that site specifics have to be taken into account, developers need to take a step back and look at the wider picture of the type of place that MK will be in the future and what sort of facilities the population moving in will expect of a place of comparable size.</p>
35) Genesis Land Ltd and Genesis Holdings Ltd (represented by Pegasus)	<p>Planning obligations should not be sought to remedy existing deficiencies, The housing proposed to 2016 is only a third of the size of that which already exists. Therefore for some services up to three quarters of the demand will come from the existing dwellings and this should be reflected in the level of contributions sought.</p>	<p>Agree that this is what the guidance states. The majority of the document is clear about contributions not being sought to make up for existing deficiencies, nevertheless some subject matters did make reference to existing deficiencies. It is not the intention to seek contributions to deal with existing deficiencies and contributions sought will be related to the impact of proposed development.</p>
36) Genesis Land Ltd and Genesis Holdings Ltd (represented by Pegasus)	<p>There needs to be an explicit acknowledgement that where a developer has made a contribution to social infrastructure that might for whatever reason fail to come forward, that after an agreed period the monies will be returned to the developer.</p>	<p>This is a normal clause contained within S.106 agreements.</p> <p>Add reference in document to monies being paid back to a developer if they have not been spent on the identified piece of infrastructure by a certain time.</p>
37) Genesis Land Ltd and Genesis Holdings Ltd (represented by Pegasus)	<p>Despite the Government's consultation on planning obligations, the latest formal statement of government policy is Circular 1/97.</p>	<p>This has now changed and Circular 5/2005 is the Government policy.</p> <p>Amend document to reflect new government guidance adopted since consultation on the draft document began.</p>
38) Bletchley & Fenny Stratford Town Council	<p>The needs of the local area should be taken into account when reviewing the use of planning contributions monies.</p>	<p>This will still be the case. However, the documents seek to provide consistent advice across the Borough on the majority of contributions that will be sought. The levels of contributions sought means that there may be less scope to seek contributions towards local projects. This is something that will have to be addressed as part of the development control process.</p>
39) Places for People Developments Ltd Midsummer Housing Association	<p>Welcome benefits that guidance brings but concerned about the fiscal impact on social organisations. We recycle capital receipts from our sales housing to subsidise affordable housing on the same development. Unless we can achieve full discounting from land values there may be a decline in affordable</p>	<p>This is an issue that has been previously recognised. As the developments of affordable housing are likely to have the same needs for social infrastructure as market housing it is fair that a proportionate contribution will be sought from these developments. MKP's tariff is applicable across all tenures, although it is likely that there will be cross-subsidy from the market</p>

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	housing building activity at the very time it is needed most. It may be more attractive for affordable housing providers to build houses in areas where costs are cheaper.	dwelling provided in the expansion areas. Ideally contributions sought will be reflected in the amount paid for the site. However, where there are significant financial issues related to viability for an affordable housing provider the Council will seek to enter an 'open book' approach to the financing of the development. If the site can only proceed with a lower contribution being attained, the issue of its acceptability will be a development control decision taking into account all the factors associated with the application.
40) West Bletchley Council	The items should have been dealt with in the Local Plan. MKC is contravening policy in the document by taking youth work from established areas to cover new growth areas.	The document expands on policies within the Local Plan. The level of detail contained within it is appropriate for a document and not the Local Plan. The document does not propose to take youth work away from established areas to cover new growth areas.
41) Hermes Property Asset Management and Prudential Property Investment Managers represented by DTZ Piedad Consulting	Accepted that developer contributions will provide an important element of funding for social infrastructure. However the level of contribution sought must be reasonable in the context of the development proposed and not so high that when considered with other planning obligations that development becomes prohibitively expensive. Excessive contributions could potentially restrict and frustrate development to such a degree that the desired growth and investment in MK is compromised.	The issue of viability of development is something that will be monitored to see if the level of contribution is having an adverse impact on housing delivery. Circular 5/2005 recognises that this might be an issue and suggests a flexible approach from authorities to weigh the lack of contribution up against other benefits that may be attributed to the development. Amend document to include reference to Circular 5/2005 and in particular paragraph B.10 which allows reduced contributions in appropriate cases.
42) Hermes Property Asset Management and Prudential Property Investment Managers represented by DTZ Piedad Consulting	The application of the SPG should be flexible and negotiable to ensure that the contribution is in line with 1/97. The rigid application of tariffs should be avoided. Contributions should only fund initial provision of social infrastructure and services and not on-going running costs.	See response to 6). The contributions sought do not seek to pay for on going running costs.
43) Gallagher Estates Ltd and Taylor Woodrow Developments represented by Wood Frampton Genesis Land Ltd and Genesis Holdings Ltd (represented by Pegasus)	Section 1.2 Local Policy needs to reflect outcomes subsequent to the Inspector's report.	Agreed, it would be useful to update the document taking into account the proposed modifications. Include updated replacement Local Plan policies.
44) Midsummer Housing Association	The document would be improved by providing a summary of anticipated contributions per dwelling. Do the contributions sought apply to all tenures? The reference to the document being a "starting point" for negotiations undermines the level of certainty that the guidance brings.	The document will be amended to show anticipated contributions per dwelling, see response to 17). Guidance in Circular 5/2005 means that the Council has to be flexible and recognise individual site characteristics, but the level of contribution sought will be that within the document unless there are significant issues that mean that a

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		<p>different level of contribution is more appropriate.</p> <p>Change document to provide more clarity on when variations in circumstances will change the level of contribution.</p>
45) Midsummer Housing Association	It might be more equitable to related contributions to gross income received from each development	This might happen under the government's review of development land tax, but cannot be done under existing planning legislation.
46) Midsummer Housing Association	Developers need to ensure profits, alternative to a standard charge per unit might to agree contribution based on open book approach undertaken by a third party surveyor who would advise on suitable level of contribution.	Planning obligations are not meant to be a betterment tax, but related to the impact of the development. It may be that the Council will have to seek lower levels of contribution where it perceives that other benefits provided by the development will outweigh this.
47) MK Partnership	Support the establishment of a tariff based approach as it provides certainty, reduces risk and provides a transparent basis for negotiation to secure legal agreements.	Noted.
48) MK Partnership	<p>The social infrastructure components of the MKP Prospectus are consistent with the elements of the Council's draft SPG. Consistent application of the "tariff" by both authorities should ensure seamless provision of facilities and services across all development in MK.</p> <p>The application of dwelling tariff is a relatively straightforward calculation on the Greenfield sites covered by MKP. The question of whether the tariff affects the viability of any particular development site or parcel does not arise. The application of the draft SPG to all development within the Council area may be too blunt an instrument for dealing with finer levels of detail encountered by the Council. Its application to smaller developments should be clarified, e.g. caveats that might reduce levels of contribution, e.g. older person's housing.</p>	<p>The consolidation of existing SPGs and SPD, aligned with changes in Government is likely to mean that the Council will offer a tariff to developers in the future, rather than negotiating on each aspect of the contribution sought. However, MKP's tariff is attractive to developers for reasons other than costs are at known at the outset. It should lever in additional funds from government to allow sites compromised by infrastructure issues to proceed. The developers also like the phasing of payments towards the latter stages of the development. Something that EP is offering because it can bankroll infrastructure in the knowledge that it will receive the contribution from developers in the future.</p> <p>If applied at face value, contributions sought from developments within this document and existing SPG are likely to be comparable for large Greenfield sites to the MKP tariff. However, the level of contributions being sought by MKC in the document significantly raises the bar on what has been achieved previously and will be applied to more than Greenfield sites. With a few exceptions, it is anticipated that developers are likely to seek the traditional approach of negotiation taking into account the circumstances of individual sites rather than agree to a set sum, which the Council can use to provide the infrastructure.</p>
49) MK Partnership	The application of funds for Adult Education, contributions to Public Art and Culture, commissioning and management of Community Houses, contribution to the Voluntary and Community sector and the requirements of the University are areas where we can assist in the development of suitable guidelines which would aid clarity and provide certainty to applicants that the contribution will be appropriately	This offer has been taken up and the guidance has been amended accordingly.

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	applied.	

Libraries

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50) South East Museum, Library and Archive Council (SEMLAC)	Central role of libraries in new communities needs to be recognised as well as their role as a gateway to other services.	Libraries do play this role and this is highlighted in paragraph 2.2.1
51) Age Concern	Position of libraries in relation to bus routes is important for older and younger people. Mobile libraries must be continued for rural areas and hard to reach communities.	This is an important issue for all social infrastructure. However, it is not considered necessary to highlight this in the document.
52) House Builders Federation	The Council is trying to make up for existing under-provision of libraries in the district.	This is not the case. The amount of new space identified in the document relates to DCMS standards and population growth.
53) House Builders Federation	There can be no justification for seeking contributions towards facilities, amenities and services that should be paid for by the public purse. Whilst the physical provision of libraries is a land use matter, the issue of stocking them with books, paying for staff, providing IT and so on is not. It is precisely those aspects of service provision for which local taxpayers of MK district pay their taxes.	The provision of a library and its initial stocking and fitting out so that it is fit for purpose as a library is considered justifiable. The Council is not seeking a contribution to its long term running costs.
54) Brooklands and Glebe Land, Hallam Land Management, William Davis Ltd, Gazeley Properties Ltd, Land Securities and TGR Williams and Sons Westbury Homes (represented by DLA)	The SPG does not provide sufficient technical detail regarding expected populations up to 2016 for the expansion areas as a means of justifying the size of library space and subsequent contribution per dwelling sought.	The contribution sought is based on population growth of the city as a whole, applied to the DCMS standard per 1000 population. Assuming that the expansion areas contain a cross section of housing that mirrors average household occupancy levels then the contribution sought is equitable. Provision of the facility within the expansion area if provided by the developer can be regarded as a contribution in kind which will be taken into account in the overall level of contribution sought from the developer. In any case it is now anticipated that the expansion areas will fall under the MKP tariff.
55) Westbury Homes (Represented by DLA)	The provision of additional library space on the west of MK has not been identified in either the Local Plan or WEA Framework.	The WEA framework has subsequently been updated to include reference to accommodate library and lifelong learning space.
56) Bucks County Council	The aspiration to meet the DCMS standard of 23 sq.m. floorspace is well below other benchmarks e.g. Hampshire's 32 sq.m.	This is true however; it is considered that as this level of provision meets DCMS guidelines it is appropriate. More space may be desirable, but it could be seen as being unreasonable for developers to pay for a level of space that is significantly above existing levels of provision.
57) Genesis Land Ltd and Genesis Holdings Ltd (represented by Pegasus)	It is unreasonable for developers to contribute towards remedying existing deficiencies in service provision; appendix 5 should show the split	The amount of space sought in Appendix 5 is not seeking to remedy deficiencies, it relates to the application of the DCMS standard to the population growth associated with new housing.

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Pegasus)	between remedying deficiencies and providing new space related to new population.	population growth associated with new housing.
58) Gallagher Estates Ltd and Taylor Woodrow Developments represented by Wood Frampton	The arithmetic in the tables needs to be checked. In addition the cost of stock and IT equipment should be omitted.	Checking of the arithmetic highlighted a minor mistake. Amend arithmetic in the table of the document.

Adult Continuing Education

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59) Fairview Homes (represented by RPS Group)	Education requirements should only be sought where the Council can demonstrate that the need arises from development and cannot be met from existing schools.	The reason for seeking additional ACE space is provided in the document. The costs of this have been apportioned equitably across all dwellings. This is regarded as fair as it is not known exactly which classes will be provided in the potential new accommodation and the propensity of occupiers of dwellings, who in most cases will be available to anyone to occupy/own, to attend those classes. Residents may not have the ACE course they wish to attend at the nearest ACE building to them.
60) Brooklands and Glebe Land, Hallam Land Management, William Davis Ltd, Gazeley Properties Ltd, Land Securities and TGR Williams and Sons Westbury Homes (represented by DLA)	Although there may be some need for facilities for daytime education, the requirement for additional space dedicated to ACE is unjustified and unreasonable. Any justification for space should be done on a site by site basis through assessing the ability of local community facilities to accommodate ACE.	See comment above.
61) Gallagher Estates Ltd and Taylor Woodrow Developments represented by Wood Frampton	This appears to be a contribution sought to extend the library contribution. There is no reasoned justification to explain why the contribution sought for ACE cannot be accommodated within the level of library space sought. There also appears to be uncertainty of where the contributions will be spent.	It is not merely to expand the library contribution. Whilst through the life long learning agenda there is logic in locating ACE with library services, the space requirements are different. However, it is recognised that there may be opportunities to share space for both library and ACE use. This has been factored into the amount of additional space that has been sought for ACE.

Museums and Archives

Respondent	Representations	Council Response
62) South East Museum, Library and Archive Council (SEMLAC)	Limited data is given on the museums and archives requirements for the growth areas. Would like to see more done on relating national standards and local needs to predicted museum and archive requirements	Agreed, SEMLAC should be the type of organisation that is providing this information to the Council or assisting MKC in gathering the information to demonstrate this. Standards guarantee access and learning for all, minimum opening times, trained staff, seasonal activities and events and by their nature value for money

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		and this would prove valuable. Evidence of local need exists and will be included to justify the predicted requirements.
63) South East Museum, Library and Archive Council (SEMLAC)	The document should contain greater recognition of the role museums and archives as guardians and interpreters of local heritage and how this can be used to support positive change and development that retains distinctiveness, identity and a sense of place.	It is agreed that more information on the role of museums and archives would be help with justification of the need for such facilities. Museums and archives contribute to a person's identity and sense of place enabling them to connect more fully with their surroundings and with other people. Artefacts and documents through interpretation and learning provide that context for people in a way that nothing else does, making access to museum and archive collections vital for successful communities.
64) South East Museum, Library and Archive Council (SEMLAC)	Recognition needs to be made of the role that libraries, museums and archive buildings can have as being a focal point for regeneration and tourism.	Agreed. Work is in progress to demonstrate the advantages of using such buildings as community regeneration focal points – for example a combined library and archive facility at Wolverton and a central museum/archive showcase for CMK that could combine with the CMK Library. The MKC Co-location Strategy will also progress this.
65) South East Museum, Library and Archive Council (SEMLAC)	Solutions could be virtual or distributed and not necessarily presume the building of a new central museum or archive and investment could run in parallel with existing arrangements with Bucks CC	The benefits of virtual and distributed solutions are recognised and are being pursued, the former in conjunction with SEMLAC funding. However MKC believes MK citizens have an equal right to local physical access to heritage as exists elsewhere in the SE. An independent report highlighted that MK is already the largest settlement in the country without a recognised central museum and with the doubling of the population proper provision is required. Existing arrangements with Bucks CC relate only to MKC collection material and do not take into account other identified local museum and archive collection material in MK that needs to be stored, conserved and displayed properly, or the required need for further museum/archive provision in relation to the Growth Agenda.
66) South East Museum, Library and Archive Council (SEMLAC)	Reference should be made to the national accreditation scheme as the recognised museum and national archive standards.	Agreed. Museum standards of Accreditation and National Archive standards are vital to establishing proper museum and archive provision in MK. MKC has held discussions with both its local museums on their accreditation and continues to discuss accreditation and national archive standards with Bucks CC as part of the SLA. MKC would welcome SEMLAC's help in moving forward its accreditation status.
67) South East Museum, Library and Archive Council (SEMLAC)	Might be worth outlining amount of provision in cities of comparable size and the qualities that the facilities bring to the city.	Agreed. An independent report has compared MK unfavourable in museum and archive terms with such places as Northampton and Luton, both of which lie within the MK sub-region and who have excellent museum and archive provision. If MK is to be the regional centre for the sub-region it needs to have the same quality offer for its citizens and for the wider region.
68) South East Museum, Library and	Greater consideration needs to be given to the volume of archaeological material	This is reflected in the museum and archive facilities identified in the document and has also

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Respondent	Representations	Council Response
Archive Council (SEMLAC)	likely to be generated by new developments.	been discussed during the twice-yearly SLA meetings with Bucks CC.
69) Brooklands and Glebe Land, Hallam Land Management, William Davis Ltd, Gazeley Properties Ltd, Land Securities and TGR Williams and Sons Westbury Homes (represented by DLA)	Having regard to Circular 1/97, the provision of museum and archive space is not a pre-requisite for development and we would therefore question the validity of seeking a contribution to this facility through developer contributions. For such a large investment, a more robust estimate of building costs should be provided.	See comment to 34).
Bucks County Council	<p>The statements on museum provision, service specification and costs are less supportive than those on archives. There is no reference in the SPG to MLA's Benchmarks in Collections Care or other advances.</p> <p>Some good ideas should be pursued, such as the regional archaeological store outlined for MK. Some form of service level agreement with Bucks CC is likely to have to continue.</p> <p>The museum compared in Banbury only dealt with public facing displays and facilities – storage is provided elsewhere.</p> <p>Logic of facilities identified for Bletchley or Stacey Bushes is 'shaky'. The specification and comparison costings do not hold water.</p>	<p>Agreed. 'Projects' are at an early stage and more work needs to be done on this during the feasibility/business planning stages. MKC welcomes Bucks CC assistance in this regard.</p> <p>Regional storage is being seen by some as the best way forward for many authorities needing to stretch limited resources further and MKC is open to exploring joint service provision in this area.</p> <p>Agreed. The CMK showcase will not be a storage facility whereas the MK Museum site will continue to upgrade its existing storage facilities. MKC needs to further research its options on storage as well as other facilities in light of developments at Bletchley Park and MK Museum at Stacey Hill Farm.</p>
70) Genesis Land Ltd and Genesis Holdings Ltd (represented by Pegasus)	The need for additional facilities rises mainly from existing population rather than new development. The contribution fails to meet the tests of 1/97, at the very most developers should be only contributing 1/3 rd of the cost related to additional population of new development.	This is not true. If population in MK remained at current levels, then museum and archive provision could continue to be delivered remotely by the SLA and local independent providers. It is the additional population through new development that is creating a 'critical mass' of people that requires new structures of <u>local</u> access, learning, display/exhibition and facilities. Existing provision cannot fulfil that role, which necessitates a strategic restructuring of provision and costs accordingly. This will result in provision that will be accessed by the whole of MK and as each development will benefit it is right that each development should contribute. See also 73)
71) Gallagher Estates Ltd and Taylor Woodrow Developments represented by Wood Frampton	No justification exists why the burden of payment is on new development. Moreover only options are outlined; consequently reference to this should be deleted.	See answer to 70) on apportionment of costs. Admittedly the costs are rough estimates and ideally there would be fully costed schemes available for scrutiny. However, the projects are not yet at this stage and further work needs to be undertaken to bring fully costed schemes to bear.
72) Midsummer Housing Association	Please comment on how capital costs will be apportioned to development	See response to 70).
73) Hermes Property Asset Management and Prudential	The relationship of the provision of these services and the growth of the city is questioned. There needs to be more	It is recognised that the museum and archive element is unusual compared when compared to other areas. This is because in the past, museum

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Respondent	Representations	Council Response
Property Investment Managers represented by DTZ Piedad Consulting	robust justification to ensure that the contribution is directly relevant and related to development.	and archive specification standards have not existed. However, Central Government has now recognised that museums and archives play a key part in people's understanding of themselves and their environment and national standards must follow. Archive and museum facilities are an expected and integral part of the fabric of all major towns and cities, especially a city at the centre of a new sub-region, which is what Milton Keynes will become in the future.

Burial Grounds/Crematorium

Respondent	Representations	Council Response
74) Age Concern	Bus routes vital for older people without cars visiting burial grounds	Noted, but not considered to be an issue that this document should address.
75) Brooklands and Glebe Land, Hallam Land Management, William Davis Ltd, Gazeley Properties Ltd, Land Securities and TGR Williams and Sons (represented by DLA)	The issue for additional burial space on the eastern flank has not been raised by either the 2 nd Deposit LP or the Eastern Expansion Area Development Framework, is therefore not supplementary to local planning policy and should be deleted.	A site has been identified for potential crematorium use, but not for burials within the development framework. Options for future burial space within the east can be explored in the proposed strategic reserve areas to the south of the A421. Amend text to refer to examining options for burial space in the Strategic Reserves on the eastern flank.
76) Brooklands and Glebe Land, Hallam Land Management, William Davis Ltd, Gazeley Properties Ltd, Land Securities and TGR Williams and Sons Westbury Homes (represented by DLA)	Land for the burial grounds is assumed to be made available at nil cost, the developers who provide this land should not be made to contribute the £22 per dwelling, as effectively they will be paying more than others.	This can be off set against any contribution that would be sought towards burial spaces as a payment in kind.
77) Genesis Land Ltd and Genesis Holdings Ltd (represented by Pegasus)	It is unclear why the land identified for burial facilities should be given at nil cost. As the need for space is citywide, the cost of the site should be spread equitably across all developments and the land valued at market rate.	The issue of land to be provided within the expansion areas towards social infrastructure facilities is being dealt with as part of negotiations on the MKP tariff. At this stage it is assumed that the land will be provided free, however if this situation changes it can be accommodated in any later SPD that deals with planning obligations.
78) Gallagher Estates Ltd and Taylor Woodrow Developments represented by Wood Frampton	No detailed justification of how the requirement arises and the extent to which it can be related to new development. There appears to be potential double counting in the methodology, further clarification is required.	Additional new burial space will be required as a result of the additional amount of development that is proposed for the period to 2016. It is therefore considered appropriate that additional development contribute towards some provision of this facility.

Community Houses

Respondent	Representations	Council Response
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Respondent	Representations	Council Response
79) Age Concern	Kitchens in community centres need to be larger and meet environmental standards for local lunch clubs	This matter would be covered in detailed negotiations and depends on the accommodation offered. It is not appropriate to include it in the document.
80) Culture South East – Government Office for the South East	The aspiration for hubs for the development of community based cultural activity hubs but would suggest that that this provision should have strong links to the community delivery of Life Long Learning and Public Health provision.	Community Houses are temporary. However, the types of services provided in them will probably be located in close proximity to these services, particularly if discussions on co-location of facilities progress sufficiently.
81) Brooklands and Glebe Land, Hallam Land Management, William Davis Ltd, Gazeley Properties Ltd, Land Securities and TGR Williams and Sons Westbury Homes (represented by DLA)	Principle of providing a community house is welcomed, there however is no justification for the £10,000 contribution. The types and scale of development to which it relates is also not stated.	Paragraph 2.6.2. sets out what the contribution will be spent on. Community houses will be sought in grid squares or large developments where the need for an additional meeting place/community hall has been identified, but for whatever reason will not be available early to occupants of new housing developments. Amend text to give more guidance when a community house will be sought.
82) Gallagher Estates Ltd and Taylor Woodrow Developments represented by Wood Frampton	The SPG on Leisure, Recreation covers community centre provision, its clear approach should be applied if possible to other elements of provision.	The provision of community houses in theory should not need to occur if the community buildings sought through the Leisure, Recreation and Sports Facilities are provided earlier on in a development.

Health Facilities

Respondent	Representations	Council Response
83) Age Concern	Modular construction of surgeries should be considered to allow easy extension	This is a good point, but is a matter for the Health Authority's procurement process.
84) Age Concern	NHS dentists should be included in this section.	There is the potential for these services to be included within the health buildings. The provision of reserve sites also allows opportunities for dental practices to locate in areas of new development.
85) Brooklands and Glebe Land, Hallam Land Management, William Davis Ltd, Gazeley Properties Ltd, Land Securities and TGR Williams and Sons (represented by DLA)	The Brooklands masterplan will provide on site health facilities, which will need to be taken into account so that the developer does not have to pay twice for this facility.	This is a fair point and will be taken into account on the overall level of contribution sought. As the area falls under the MKP tariff, this will be a matter for MKP to determine how these will be considered against the tariff.
86) Westbury Homes (represented by DLA)	Any provision of new health facilities within the WEA should be directly related in scale and kind to the proposed development.	The level of contribution sought will be related to the impact of the development, however it is anticipated that a PCT hub will be provided in the WEA with the developers being compensated for any additional costs. As the area falls under the MKP tariff, this will be a matter for MKP to determine how these will be considered against the tariff.

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Respondent	Representations	Council Response
87) Gallagher Estates Ltd and Taylor Woodrow Developments represented by Wood Frampton	New development should plan properly for health facilities provision. Financial contributions should not be sought, it is not appropriate that delays or problems in Strategic Health Authority funding arrangements should be overcome by alternative funding from new development. Reference to funding should be deleted.	The need for health centres arises as a direct result of the housing built, therefore a contribution towards the provision of healthcare is legitimate according to Circular 5/2005. It is now not unusual for local authorities to receive contributions towards health facilities. The Council has done so previously and the MKP tariff also includes a contribution towards health facilities provision.
88) Milton Keynes Primary Care Trust	Important that the level of contribution sought is consistent with that agreed between MK Forward and MK Partnership.	Noted. Wherever possible the level of contribution sought by the Council will be comparable to that within the MKP tariff.
89) Milton Keynes Primary Care Trust	<p>Please could you include the following information on Integrated Health and Social Care Centres into the section after 2.7.2</p> <p>“The PCT plans for development in primary and community care in Milton Keynes envisage a hub and spoke model, with a smaller number of integrated health centres (hubs) each having associated GP surgeries (spokes). Once established, integrated health centres will be sites for the delivery of various services, much of which is currently delivered in secondary care. These services are likely to include:</p> <p>Follow up or special review of patients with other long term conditions (including chronic obstructive pulmonary disease, coronary heart disease, epilepsy, diabetes)</p> <p>Minor treatments and procedures such as a minor surgery unit</p> <p>Support for patient education, self-care and self-management advice (including running patient groups such as the expert patient programme)</p> <p>Diagnostics, such as echocardiology, spirometry, plain X-rays and ultrasound.</p> <p>Health promotion sessions such as weight management and smoking cessation.</p> <p>Potential development of midwife-led maternity units (depending on recommendations in NICE guidance on intrapartum care, due February 2007)</p> <p>Although the IHSCCs can provide some care close to patients’ homes, there will still remain the need to seek out expert opinion on more specialised investigation via out patients on the hospital site. The</p>	<p>This provides more detail on the type of facilities that will be built and therefore it is considered that it is appropriate to add it to the document.</p> <p>Add the information provided by the PCT to the document</p>

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Respondent	Representations	Council Response
	increased population/housing numbers will mean that there is a need to increase provision of healthcare, not just primary care facilities.”	
90) Milton Keynes Primary Care Trust	MK PCT uses a guide of 1 GP per 1950 people, not 1 per 1800 people.	Noted. Amend document to reflect the standard.
91) Milton Keynes Primary Care Trust	There have also been some changes to the names of doctors listed at the practices in Appendix 8.	Noted. Amend document to reflect these changes.

Waste Management

Respondent	Representations	Council Response
92) Age Concern	Would like to see inclusion of support for Age Concern’s recycling project.	Whilst it is a worthwhile project it is not considered necessary to amend the document.
93) Brooklands and Glebe Land, Hallam Land Management, William Davis Ltd, Gazeley Properties Ltd, Land Securities and TGR Williams and Sons (represented by DLA)	The estimates of space required for a new waste facility associated with new development does not take into account the potential for waste reduction/recycling. The contribution to receptacles is unjustifiable and unreasonable. Provision of these items should form part of the standard service provided by the Council for new taxpayers.	The estimate is planning for the worst-case scenario in terms of growth of waste and includes provision for recycling. The Council’s Waste Strategy does seek to reduce the amount of waste people generate. Nevertheless, it is a fact that increases in wealth are directly linked to increases in the production of household waste. In the short term without radical steps being taken at a national level it is difficult to see this trend reducing. Increasing the proportion of recycling would not decrease the need for space for facilities due to the sorting and cleaning of materials. MKC has consistently sought and obtained contributions towards these types of facilities previously.
94) Westbury Homes (Represented by DLA)	The estimates of space required for a new waste facility associated with new development does not take into account the potential for waste reduction/recycling. The £30 contribution towards the water butt seems unjustifiable and unreasonable.	See answer above. If the developer feels that they can provide a water butt that is sufficiently robust and has adequate capacity for a cheaper price, then the obligation can be amended for them to provide the butts rather than the Council.
95) Bucks County Council	Support contributions towards recycling receptacles, compost bins, water butts, but understand that a contribution towards these facilities has been dismissed at appeal elsewhere.	See response to 93).
96) Gallagher Estates Ltd and Taylor Woodrow Developments represented by Wood Frampton	Not sure of housing numbers used. Calculations in appendix 10 assume that currently all facilities have zero capacity. Para 2.8.1 states substantial capital and revenue expenditure on the adaption of existing facilities is required “even if growth was not occurring”. It is not appropriate for development to rectify an existing problem. Unless a more robust	Facilities are currently near capacity and will reach it if the number of dwellings stayed the same due to increases in waste generation and also to new methods of dealing with various waste streams. The impact of new housing development has been separated from that of the existing population.

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Respondent	Representations	Council Response
	justification can be provided, the strategic waste contribution should be deleted.	

Public Art

Respondent	Representations	Council Response
97) Councillor Holroyd	Where is the figure for public art derived? Art should be viewed more widely than sculptures or fixed installations.	The figure is set out in the replacement Local Plan and reflects similar policies elsewhere. The document recognises that art covers a wide variety of media in paragraph 2.9.2.
98) Brooklands and Glebe Land, Hallam Land Management, William Davis Ltd, Gazeley Properties Ltd, Land Securities and TGR Williams and Sons, Westbury Homes (represented by DLA)	A specific contribution based on a percentage of the capital cost of construction is unrealistic.	Compared to levels of contribution previously attained it is ambitious, but is at a level accepted by the Inspector when dealing with objections to the replacement Local Plan.
99) Arts Council England	The effectiveness of pooling contributions needs tracking to ensure whether this is more effective than the current approach of individual negotiations. We would support a range of provision from neighbourhood to town centre.	Increased monitoring of S.106 contributions is something that the Council is seeking to address. The Council's Art Strategy should be more explicit on these sorts of issues.
100) Gallagher Estates Ltd and Taylor Woodrow Developments represented by Wood Frampton	The text of the SPG should be changed to reflect paragraph 15.2.4 of the Local Plan Inspectors Part 2 report.	The change proposed by the Inspector has been incorporated into the proposed modifications. The wording in the document is consistent with that in the proposed modifications.
101) Arts Council England	The wording of 2.9.2 needs to explicitly state works of a high quality. The role of festivals, programmed activities in public spaces, music and dance needs much greater emphasis as they can form the 'glue' that links diverse groups of people to a place.	It is agreed that works should be of high quality and that it appears that the text is biased towards fixed installations. Amend text to seek quality and increase prominence to alternatives to fixed installations.
102) Arts Council England	We would encourage MKC to investigate innovative models for involving artists in the design and development of such houses, making spaces of interest both internally and externally. This could be a small step in encouraging local distinctiveness.	Noted.
103) Bletchley & Fenny Stratford Town Council	Welcome recognition of the importance of public art.	Noted.

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Social Care

Respondent	Representations	Council Response
104) Bucks County Council	There is no reference in the estimates given for building based services. This seems a significant omission.	Internal consultation occurred with Neighbourhood Services and what is sought reflects facilities identified.

Social Care – Day Centre

Respondent	Representations	Council Response
105) Age Concern	Wish to see a facility for rural day care included in the Woburn Sands/Wavendon area and expansion needs of Olney also need to be covered.	A meeting place is being supplied in the redevelopment of the Nampak site. This facility may be an appropriate location from which to provide organised activities for elderly people and will be explored as part of the ongoing dialogue between commissioners and provider organisations.
106) Age Concern	Would like to see support and acknowledgements for capital needs of the expansion of phase 2 of Age Concern's Peartree Centre	This is the type of facility that could benefit from the contribution sought towards the voluntary sector.
107) Age Concern	Suggest figures are checked against previous build costs	Until any specific building design is agreed, costs are going to be rough approximations. Discussions with providers are ongoing in order to clarify benefits of integrating services / joint ventures including economic / cost benefits.
108) Brooklands and Glebe Land, Hallam Land Management, William Davis Ltd, Gazeley Properties Ltd, Land Securities and TGR Williams and Sons, Westbury Homes (represented by DLA)	Provision of these services should be based on an assessment of capacity of existing facilities to accommodate any increase in demand for these services. The SPG does not identify where new facilities are to be located. The contribution per dwelling would be £45 based on costs shown not £55.	The estimate of new facilities has been undertaken taking into account the possibility of rolling out new forms of care and using facilities such as meeting places for provision of services. No location has been finalised for these facilities, but it will have to be in a location that is easily accessible to public transport. Opportunities may exist in the expansion areas on reserve sites. The arithmetic in this section is correct.
109) Gallagher Estates Ltd and Taylor Woodrow Developments represented by Wood Frampton	If there is a direct land use-planning link can be made, say for the reservation of a site, this may be appropriate. It is not appropriate to seek to transfer the financial obligation of a public sector organisation to the private sector, especially where funding is usually generated through general taxation.	There is no funding difference between a contribution for this type of facility and a meeting place, which is something that developers already agree to pay for in MK. Development of new dwellings with the associated expansion of the population will create a need for these types of facilities.

Social Care – Older People's Housing

Respondent	Representations	Council Response
110) Age Concern	Welcome an Extra Care Village, but want absolute assurance that revenue funding for this does not have any adverse or unequal impact on services for the majority of older people who are not Village residents and that the impact on	This is a detailed budgetary issue for Neighbourhood Services. Such an assurance cannot be given, as there could be any number of factors that influence the finances available to the Council to support such services. Support for the new Village has been informed by its potential

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Respondent	Representations	Council Response
	sheltered housing was well thought through and incorporated into planning.	impact on future levels of social care for the elderly.
111) Brooklands and Glebe Land, Hallam Land Management, William Davis Ltd, Gazeley Properties Ltd, Land Securities and TGR Williams and Sons (represented by DLA)	There is no reason why a retirement village cannot be run as a commercial undertaking and as such a contribution is unnecessary and unjustified.	The subsidy is required to provide dwellings and support to those that would not ordinarily be able to fund such services provided by a purely commercial undertaking. Without significant levels of subsidy this type of operation would not be viable. Splitting the commercially profitable element of the village from the rest would lead to a greater level of subsidy being required to provide the accommodation and services
112) Westbury Homes (represented by DLA)	If the retirement village is to be provided in the WEA, then the developer will seek assurance regarding cost recovery.	As this need for this facility would be generated from more than the WEA, this is acceptable.
113) Genesis Land Ltd and Genesis Holdings Ltd (represented by Pegasus)	The need for these facilities will come from the existing population, rather than that from new development. Funds should be sought from other sources, the level of developer contribution sought appears arbitrary and needs more justification and transparency. The contribution sought is based on market land values rather than at the affordable housing rate which a substantial part of the scheme will comprise	The new village being constructed along with existing facilities will help cater for the existing population. A new facility will cater for future growth in needs. Given the aging profile of the existing population, it is correct that some of the need will be met from existing housing. However, the model will actually meet the needs of people currently aged 40+ who will move into the new houses planned and from outside the area. The level of funding has been based on the new village being built at Willen Park. The amount per acre recognises the costs associated with having to provide affordable housing.
114) Gallagher Estates Ltd and Taylor Woodrow Developments represented by Wood Frampton	The contribution is inappropriate, as it is covered by the SPG on Affordable Housing.	This is a strategic form of specialist housing meeting a need that is wider than that which would reflect any individual site being built. It is therefore considered appropriate to include it within this document.

Social Care – Children’s Homes

Respondent	Representations	Council Response
115) Brooklands and Glebe Land, Hallam Land Management, William Davis Ltd, Gazeley Properties Ltd, Land Securities and TGR Williams and Sons, Westbury Homes (represented by DLA)	The need for these facilities has not been identified in the Local Plan or EEA Development Framework. The issue of cost recovery if a developer provides the facility needs to be addressed.	It is agreed that the cost recovery issue is valid, see answer to 31).
116) Westbury Homes (Represented by DLA)	The need for these facilities has not been identified in the Local Plan or WEA Development Framework. The issue of cost recovery if a developer provides the facility needs to be addressed.	It is agreed that the cost recovery issue is valid, see answer to 31).

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Respondent	Representations	Council Response
117) Bucks County Council	An eight bedded long term children's unit is suggested to address the fact that many parents find it difficult to manage the care of children with complex needs. What will happen to these individuals when they reach adulthood? There appears to be no planned residential accommodation for those over 18 with such needs. Also the 12 bed unit suggested would probably be too big for registration and 8 beds is probably pushing the limit – so the size and number of children's homes needs to be reconsidered with CSCI guidance.	The suggested 12 bedded unit would be a respite care unit split into 2 6 bedded units which would be acceptable to CSCI. It is agreed that 8 is probably too big and thus 2 x 4/5 bedded units would be more appropriate. There is a proposal for increased day services for young adults with special needs/ learning disabilities. In terms of residential provision, planning tends to be done on a person-by-person basis. At this stage there are no plans for a residential unit. Such provision if needed would be commissioned from the private and voluntary sector. Amend text to clarify position re: 12 bed unit and replace one 8-bed unit with two 4/5-bed units.
118) Gallagher Estates Ltd and Taylor Woodrow Developments represented by Wood Frampton	The contribution is inappropriate, as it is covered by the SPG on Affordable Housing.	This is not an affordable housing issue, its inclusion within this document is considered valid.

Reserve Sites

Respondent	Representations	Council Response
119) Brooklands and Glebe Land, Hallam Land Management, William Davis Ltd, Gazeley Properties Ltd, Land Securities and TGR Williams and Sons, Westbury Homes (represented by DLA)	Given the comprehensive nature of the planning of the WEA and EEA we are of the opinion that reserve sites are not required in new development.	This is adopted Local Plan policy and one that the Inspector has supported for the replacement Local Plan. The need for reserve sites has been addressed in the development framework for both of these sites.
120) Gallagher Estates Ltd and Taylor Woodrow Developments represented by Wood Frampton	The SPG should make reference to the range of uses that can be accommodated on these sites, including "private housing".	This use is identified in the Local Plan, therefore its inclusion within the document is accepted. Amend document to refer to private housing.

Emergency Service Provision

Respondent	Representations	Council Response
121) Gallagher Estates Ltd and Taylor Woodrow Developments represented by Wood Frampton	The reference in paragraph 2.14.2 should be applied more consistently in the SPG, i.e. not to include emergency service provision without specific confirmation of requirements related to new development	This section of the document has been amended to take account of costs identified in the MKP tariff negotiations.

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Voluntary Sector Contribution

Respondent	Representations	Council Response
122) Age Concern	Welcome moves to support the voluntary sector.	Noted
123) Brooklands and Glebe Land, Hallam Land Management, William Davis Ltd, Gazeley Properties Ltd, Land Securities and TGR Williams and Sons (represented by DLA)	This contribution cannot be regarded as a pre-requisite for development and we would therefore question the validity of seeking a contribution to these activities.	The reason for the contribution sought is given within the document. When considered in the context of the growth of MK as a whole it is considered to be a reasonable request. See response to 34) above.
124) Westbury Homes (Represented by DLA)	Contribution of £250 is unrealistic and unjustified. Limited detail is supplied on the type and nature of the voluntary organisations to which the contribution applies. A more robust justification is required.	The document will be amended to provide a more robust justification. Amend document to provide a more robust justification.
125) Hermes Property Asset Management and Prudential Property Investment Managers represented by DTZ Piedad Consulting	The level of contribution is not qualified or justified. Whilst the benefit of expanding such organisations it is suggested that a demonstration of the calculation of the sum be provided and the sum be reduced, as the total funds received may be beyond actual requirements.	See response to 124).
126) Gallagher Estates Ltd and Taylor Woodrow Developments represented by Wood Frampton	Contribution sought has no policy basis and has no justification	See above response 124) about justification. The policies in the adopted and replacement Local Plan provide a sufficient basis on which to seek this contribution. It is not appropriate within the Plan to list every type of contribution that will be sought.

University Centre MK

Respondent	Representations	Council Response
127) Councillor Holroyd	Why is the University contribution based on a cost per dwelling, whereas the college which has specific costs is not?	Agree that similar approach should be applied to a contribution for the college. Change document to reflect level of contribution sought to the University from development.
128) Brooklands and Glebe Land, Hallam Land Management, William Davis Ltd, Gazeley Properties Ltd, Land Securities and TGR Williams and Sons, Westbury Homes (represented by DLA)	The SPG does not outline the detailed capital costs of the University and does not indicate any other sources of funding such as central government. With reference to Circular 1/97 it would be unreasonable and unjustifiable to obtain the full capital costs of the university from developers. In addition it is questionable whether such a contribution could be regarded as	The justification for the University does need to be improved and will contain initial estimates of costs of buildings. The level of contribution sought takes into account potential alternative funding sources. See response 34) in relation to contributions related to the growth of MK. Change document to provide improved reasoning and amend costs to reflect level of contribution sought.

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Respondent	Representations	Council Response
	meeting the tests set out in Circular 1/97 such as it being necessary to make the proposed development acceptable in planning terms, relevant to planning and reasonable in all other respects.	
129) Bucks County Council	Reference is made to latent and unmet need as well as future need. Whilst these issues are acknowledged to be important it is less clear that they can be taken into account as a need rising from development in line with Circular 1/97.	This is agreed. Nevertheless the continued development of the city makes the provision of a university more of a necessity than if it stayed at the same size. See response to 128).
130) Jeremy Cook (University for MK)	UMK is one of the key strategic elements of the economic, social and educational vision of MK and without substantial public investment will be unable to realise its full potential. University Centre MK would be preferable to MK University which cannot be used without approval of Privy Council.	Noted. Agree that the title should be changed to reflect this information. Change reference to University Centre Milton Keynes.
131) Genesis Land Ltd and Genesis Holdings Ltd (represented by Pegasus)	The link to 1/97 necessity, relevance to the proposed development and planning is very tenuous. The scheme mostly caters for existing population needs, the aspiration for a University should not be allowed to influence a planning decision in due course.	See comments to 128).
132) Hermes Property Asset Management and Prudential Property Investment Managers represented by DTZ Piedad Consulting	The proposed university is supported, however the contribution sought is not qualified or justified. There is a need for further justification for the sum sought and the level of sum sought should be reduced.	See comments to 128).
133) Gallagher Estates Ltd and Taylor Woodrow Developments represented by Wood Frampton	No reasoned justification for £950, no provision should be sought without specific and direct confirmation of requirements related to new development.	See comments to 128)

MK College

Respondent	Representations	Council Response
134) Age Concern	2007/8 is too late for the purpose built construction centre as training needed now to meet expansion agenda.	It is recognised that there are skill deficiencies evident now, however the timing is a matter of fact. A new Phase 1 Construction Training Centre will open September 05 to help meet existing need.
135) Hermes Property Asset Management and Prudential Property Investment Managers represented by DTZ	Rise in student numbers associated with new development is acknowledged. The information provided in appendix 12 should be supplemented by an estimated contribution per unit.	It is considered that the approach of estimating a contribution per dwelling followed in the rest of the document should be applied to this subject matter. Change document to provide a per dwelling estimate of contribution to the college.

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Respondent	Representations	Council Response
Pieda Consulting		
136) Gallagher Estates Ltd and Taylor Woodrow Developments represented by Wood Frampton	Contribution is inappropriate as a contribution towards post 16 education is covered in the education planning obligations SPG. The sum highlighted is based on additional building space and equipment.	The contribution sought in the Education SPG is post 16 education provided by MKC. The sum highlighted is the capital cost of providing the facility.

Inward Investment

Respondent	Representations	Council Response
137) Brooklands and Glebe Land, Hallam Land Management, William Davis Ltd, Gazeley Properties Ltd, Land Securities and TGR Williams and Sons, Westbury Homes (represented by DLA)	This contribution does not meet any of the tests set out in Circular 1/97 regarding planning obligations.	See response to 34) on strategic approach to contributions.
138) Genesis Land Ltd and Genesis Holdings Ltd (represented by Pegasus)	Whilst the aims are laudable, it is not justifiable in terms of 1/97. In the event that the Council presses ahead with this item any funds should be matched by MKC/MKP, existing employers, etc. The development industry would certainly wish to have some say in how the money was to be spent.	See response to 34) on strategic approach to contributions. MKP has now taken over an Inward Investment Team that will progress the promotion of Milton Keynes to gain additional investor interest.
139) Hermes Property Asset Management and Prudential Property Investment Managers represented by DTZ Pieda Consulting	The contribution is supported but is not sufficiently qualified or justified. There is a need for further justification for the sum sought.	See response to 34) on strategic approach to contributions.
Gallagher Estates Ltd and Taylor Woodrow Developments represented by Wood Frampton	The contribution sought is purely an aspiration of the Council and not appropriate. There is no reasoned justification for the figure sought.	See response to 34) on strategic approach to contributions.

Culture

Respondent	Representations	Council Response
140) South East Museum, Library and Archive Council (SEMLAC)	ODPM guidance suggests that how far development Plans take account of other strategies such as the Regional Cultural Strategy are a 'test of soundness' of plans. The SPG would benefit from reference to the recommendations of "Living Spaces: Culture and Sustainable Communities in Milton Keynes and the	The addition of reference to this document would provide useful background to the contribution justification. Add reference to 'Living Spaces: Culture and Sustainable Communities in Milton Keynes and the South Midlands.'

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Respondent	Representations	Council Response
	South Midlands".	
141) South East Museum, Library and Archive Council (SEMLAC)	The Council may wish to elaborate on what the consequences may be if the infrastructure investment is not made.	Concentrating on the benefits of culture contained within the document is considered acceptable.
142) South East Museum, Library and Archive Council (SEMLAC)	A needs assessment taking into account existing facilities and future growth in population will need to occur. Additional work will be required to calculate the levels of contribution required.	It is agreed that it is likely that this sort of work will need to be undertaken in the future; this is likely to take some time and can then be reflected in later advice on obligations sought.
143) South East Museum, Library and Archive Council (SEMLAC)	Co-location of facilities may lead to a more efficient and targeted use of finance and outcomes. The cross cutting nature of cultural activities should be reflected through the Plan rather than being restricted to particular sections.	This is agreed and is something that MKC is investigating with a range of partners including the PCT. However, it is too early to say what the impact will be on contributions from development. Agreed, but feel that the balance is acceptable in this document.

Site Specific Issues

Respondent	Representations	Council Response
144) RPS	Tickford Fields: Proportionate contribution towards extension at Newport Pagnell library and Ace may be appropriate. Contribution towards stocking is not – it is a revenue item. Newport Pagnell Health Centre appears adequate depending on amount of development at Tickford Fields. Property design to accommodate waste storage is not a S.106 issue. Public Art should allow innovation and discretion to ensure that to a large extent maintenance issues are designed out. Public art can be incorporated in the design without need for a separate contribution. Contributions to voluntary sector off site should be directly related to the development.	These are issues that can be dealt with as part of the development control process.

Sustainability Appraisal

Respondent	Representations	Council Response
145) Age Concern	Aim 1. What does sustainably constructed mean? We would like to see 'Lifelong' occupancy to take account of age and disability. (1)	Sustainably constructed means that it is done in a manner that seeks to limit as far as possible the adverse environmental impact, both in its construction and future use. The Buildings Research Establishment has criteria against which construction can be judged.
146) Age Concern	Aim 2. Do not want to see any building on floodplains. (2)	This is not proposed and is covered in the 'Drainage and Flood Risk' SPG.
147) Age Concern	Aim 3. Transport and rural needs must be addressed more fully as they are key to health and well-being. Local access to social care as well as health care is	The solutions for dealing with improving access to health facilities are covered by the respective PCT's Strategic Service Delivery Plan.

Draft Social Infrastructure Planning Obligations document: Comments received and officer comments

Respondent	Representations	Council Response
	social care as well as health care is important. (3)	
148) Age Concern	Aim 4. Why are we limiting the amount of infill which is key to transport sustainability? (4)	Infill is limited by the opportunities that are presented for land to be reused, usually because it is being used for other purposes.
149) Age Concern	Aim 6. CRU initiatives need to examine sculpturing landscape adjacent to dwellings to eliminate crime encouraging blind spots (6)	Agree, the issue of community safety has now been addressed by the introduction of a contribution towards CCTV.
150) Age Concern	Aim 8. This must not preclude the overall development of transport around the Borough. (8)	Agree, but reducing the need to travel and providing access to local services are also key aims. Providing local services for people allows this objective to be met.
151) Age Concern	Aim 12. There will be a need to upgrade existing properties to meet CO2 emission requirements. (12)	This topic is not addressed in the document, but the Council's forthcoming guidance on sustainable construction will.
152) Age Concern	Aim 15. Consideration should be given to provision of secure home delivery receivers for home delivery	Good idea, but it is not appropriate to address this in the document.
153) Age Concern	Aim 25. College construction needed in advance of development	The construction of the building trades section is programmed to occur before the majority of new development will occur.
154) Gallagher Estates Ltd and Taylor Woodrow Developments represented by Wood Frampton	The SA appears to be being used as an ex post defacto justification for including many elements of the social infrastructure which otherwise would be difficult to relate directly to new development.	This is certainly not the case. The Sustainability Appraisal highlights the negative (small) and positive attributes that the application of the document and the negotiation of social infrastructure will have. It highlights that they are integral components of sustainable development.