



**Plan:MK  
Examination July 2018**

**Hearing Statement on behalf of O&H Properties  
In respect of the allocation of land at  
South East Milton Keynes  
(Policy SD 13)**

**21 June 2018**

### **O&H Response to Inspector's Questions**

O&H wishes to make a number of points to supplement its representations made to the Draft Plan (March 2017) and Pre-Submission Version (Dec 2017) of Plan:MK.

This Hearing Statement provides:

- (i) Further information to assist the Inspector in respect of his questions posed to the Council (dated 3 June 2018) in respect of Matter 5 Issue 3;
- (ii) Representations in respect of the Council's *Proposed Modifications* to the Submission Version (March 2018).

A Separate Hearing Statement in respect of the Stage 2 Hearings will be submitted by the 13 August deadline.

It should be noted that a Statement of Common Ground (SoCG) is currently being prepared between Gallagher Estates Ltd, Gladman Developments, O&H Properties and Milton Keynes Council.

The SoCG is unlikely to be finalised and signed before the deadline for Hearing Statements. As such, the comments made by O&H in this Hearing Statement may be superseded (or subject to refinement and clarification) following the submission of an agreed SoCG before the Hearing Sessions commence in July.

### **Matter 5: Strategic Site Allocations and Urban Extensions**

#### **Issue 3 – South East Milton Keynes (SEMK) (Policy SD13)**

**Q5.17 Based on all the evidence, is the Plan positively prepared in respect of SEMK and is the identification of this strategic site adequately justified?**

#### ***Context for the selection of SEMK as a strategic growth location***

1. A significant part of the proposed SEMK allocation (that north of the railway) has already been tested through policy and plan formulation. The principle of a south-eastern expansion of the new city was examined from a planning policy perspective in the previous round of development plan policy, having been favourably assessed for growth and change at a strategic level: the Growth Study underlying the Deputy Prime Minister's *Sustainable Communities Plan 2003* led to the South East Plan (2009) providing for major expansion of Milton Keynes.
2. This included a 'sustainable urban extension' of around 5,000 homes and associated uses in SE MK, extending into what was then the adjoining Mid-Beds District (now Central Bedfordshire Unitary Council). In that context MK Council published a Draft *Core Strategy Pre-Submission Version* (February 2010). This identified the land north of the railway as part of a larger "Strategic Development Area" (SDA) extending east from Wavendon Gate and Old Farm Park to the M1 Junction 13, in order to help meet the South East Plan's housing requirement for 41,360 dwellings between 2006 and 2026.
3. However, in response to the decision to abolish the Regional Spatial Strategies, MKC withdrew the Draft Core Strategy Pre-Submission Version with its strategic land allocations, replacing this plan with a new version incorporating a reduced housing requirement to 2026 and consequent reduction in housing land allocations. This reduction included the removal of the

SDA in the south east in favour of a much smaller Strategic Land Allocation (SLA) included in the adopted Core Strategy (2013) and now consented.

4. Since the adoption of the Core Strategy, strategic infrastructure projects in the area (East West Rail (EWR) and the Oxford-Cambridge Expressway (OCE)) have reinforced the case for strategic development in this location, with the Plan:MK policy context aiming to embed the NIC's infrastructure-led growth strategy through the allocation and development of land capable of accessing and maximising sustainable forms of travel within the O2C Arc.
5. The site lies adjacent to Woburn Sands and Bow Brickhill rail stations (the former of which is identified as a stopping station on EWR). It is capable of directly accessing those rail services already in operation plus the enhanced services planned as part of EWR. The design of development is capable of supporting the Council's Mobility Strategy objectives (particularly in terms of enhanced 'first-last mile' provision between stations and the rest of MK). In addition, land could be made available through the Development Framework process for the safeguarding, expansion or re-provision of rail-related facilities at Woburn Sands in the event that Network Rail decisions are made to invest in rail infrastructure to support enhanced patronage of EWR services.
6. The land is unconstrained by heritage, landscape, ecological or other physical features and is defined by robust boundaries. The site extent will allow for the building in of strategic green buffers to existing settlements/villages (following the original design approach adopted in Milton Keynes to ensure the protection of distinct character and sensitive co-location of existing settlements and new development).
7. Following the 'completion' of development within the original planned MK Development Area, land adjacent to the urban area (and settlements close to MK) has been subject to a number of speculative and piecemeal developments which have been granted consent on the basis of the lack of a 5YrHLS and/or on the basis that they constitute sustainable development simply by being on the edge of an existing settlement. A strategic site allocation for a well-defined area which builds in the necessary infrastructure to manage, mitigate and serve new growth provides a positive policy framework for well-planned growth, thus minimising the risk of future uncoordinated, unplanned and speculative growth.

**Q5.18 Is the overall size of the allocation and the quantity of development proposed appropriate? Should additional land be included within the allocation to make it sound, including those areas indicated in the schedule of proposed modifications (PM39 & PM40)?**

***Overall Site Area and Quantity of Development***

8. O&H considers that the overall site size and quantity of development proposed is appropriate to deliver a sustainable urban extension. The site allocation is based on robust and definable site boundaries and includes land to deliver strategic green and grey infrastructure (village buffers, strategic highway connections and reserves).

***Proposed Modification PM40 – Inclusion of Additional Land***

*(i) Addition of land on the eastern boundary of SD13.*

9. O&H did not propose the addition of land as set out in PM40 as part of the SD13 site boundary and does not consider it essential to the delivery of a comprehensive scheme. The additional land shown in Policies Map Sheet 4 (p11 of Proposed Modifications Schedule) is under third party ownership (Raven Russia) who have made independent representations to Plan:MK seeking inclusion of this land for residential development.

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10. O&H does not object in principle to the proposed inclusion of this land within Policy SD13 provided it is as part of a comprehensively planned scheme. However, early discussions between MKC and the owners/promoters of the additional land suggest that once the allocation is confirmed in the adopted Plan:MK the promoters intend to bring forward a standalone application for residential development on this part of the site.
11. Due to the continued pressure for MKC to secure and maintain a 5yr HLS it is our opinion that the Council would find it hard to resist granting such a standalone application despite the current policy drafting which requires a Comprehensive Development Framework document (CDF) to be in place prior to approval of an application.
12. It is imperative if the allocation is to deliver the appropriate and full amount of infrastructure and services to support the number of homes planned (including healthcare, education and community facilities to be met on-site) that all parties with development land within the allocation make an equitable contribution (land/financial) to the provision of site-wide infrastructure and services. As the development is likely to be implemented through a series of separate planning applications, it is essential that there is sufficient policy imperative to compel each party to make the requisite contribution to site-wide requirements set out in said policy. Indeed, the lack of an adequate and robust policy imperative in this regard has previously led to delays in the delivery and build out of other allocated strategic sites in MK.
13. On this basis, if the Inspector considers that inclusion of this land within the SD13 site boundary is justified and would add to the soundness of Policy SD13, O&H seek reassurance that policy SD13 is strengthened to require that all land included within the SD13 site boundary forms part of the agreed Comprehensive Development Framework Document required in policy SD12.
14. In order to achieve a sound and deliverable policy, we therefore seek the addition of the following wording to the final paragraph of SD13:
- “Planning permission will not be granted for any part of the site in the absence of or in advance of an adopted Comprehensive Development Framework which includes agreed Heads of Terms for tariff-based contributions to site wide infrastructure, education and other on- and off-site services and facilities deemed necessary to make the development as a whole acceptable in planning terms”.**
15. The Inspector may also wish to consider whether this policy wording should also be added to SD12 to apply to all strategic urban extensions.
- (ii) *Addition of land on the north western boundary of SD13*
16. O&H wish to request an additional Minor Modification in respect of a small area of land to the north west of the currently proposed allocation site boundary (see Plan OHP008-020 attached at Appendix 1). It is unclear why this land was not originally allocated (there is no physical, environmental or policy reason for its exclusion), but this parcel forms a small part of a larger landholding to the south included as part of the allocation site. Its inclusion would enable the current ‘incursion’ into the allocation site to be remedied to form a more logical and regular site boundary, thus enabling the delivery of well-designed green and grey infrastructure between existing, planned and new development.
17. **O&H therefore request that the site boundary of SD13 is amended to include that land shown in the attached plan OHP008-020.**
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**Q5.19 Is the trajectory for completions at SEMK over the plan period realistic? Does it take account of any necessary comprehensive development framework approach and is there in-built flexibility to resolve any barriers to delivery? Are lead-in times and delivery rates reasonable?**

18. The Council's proposed trajectory for the delivery of SEMK shows how c. 3,000 units can be delivered within the plan period as follows (document ref MK/SUB/004a2, reproduced as table (i) below). This trajectory has regard to wider decisions being made in respect of the Expressway and also assumes a phased delivery of the development, with a number of housebuilders providing outlets simultaneously later in the plan period.

Table (i):

2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31
0	0	0	0	75	200	300	400	400	400	400	400	425

19. O&H consider that if the Council's site wide trajectory is to be met, then the CDF will need to be agreed during 2018/early 2019 to allow outline applications to be submitted, considered and approved for a meaningful proportion of the site by 2019/20. This will allow REM permissions, pre-commencement activity and site preparation to be undertaken during 2020/22 with the first completions in the latter part of 2022. This is challenging but is achievable provided progress is made on the CDF (currently underway).
20. For information, set out below is an expanded trajectory to reflect O&H's anticipated timetable for its part of the allocation site and its contribution to the Council's site wide trajectory (Table (ii)). The SoCG will confirm the agreed position on the site-wide trajectory.

Table (ii)

	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31
	0	0	0	0	75	100	100	100	150	150	150	150	150
<b>O&amp;H (plus Raven Russia)</b>													
CDF Approved AS SPD including HOTS/Tariff Agreed													
Submit OPA (O&H) post-OCE Route Decision													
Grant PP (outline with detailed infrastructure)													
Design Codes, Site Implementation Works													
2 developers													
2 developers													
2 developers													
2-3 developers													
2-3 developers													
2-3 developers													
2-3 developers													
2-3 developers													

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**Q5.20 What degree of certainty can be given to the capacity of the site having regard to the route options for the proposed Expressway and necessary safeguarding and buffer of a possible route? Is it correct that route options B and C for the Expressway would both affect SEMK?**

21. It is not yet known whether or to what extent the Expressway will directly affect the allocated site and/or the wider area, for the following reasons:
- A preferred 'corridor' for the Oxford to Cambridge Expressway (as defined in the highways England plans appended to the MKC response to the Inspector dated 3 June) will not be announced until Summer 2018;
  - In respect of SEMK, as all three broad 'corridors' cover the allocation site, the summer 2018 announcement will not result in any further clarification on the need to accommodate or safeguard land for the Expressway;
  - Consultation on route options is due to take place during 2019/20, with a preferred route to be decided in 2020.
22. The Council has attempted an analysis of how an 'Expressway' (with a specification as set out in Highways England's Project Brief) might route through the site and the impact on land take that such a route would have. Based on an assumption that a 100m wide corridor would be required to accommodate the highway infrastructure, drainage and buffers to adjacent land uses, this analysis indicates that an area of approximately 30 hectares within the site would be needed to accommodate this infrastructure, leaving c. 170 hectares for development.
23. On this basis, the Council's assumptions are that the site could accommodate around 3,000 homes with an Expressway route running through it, and potentially around 3,500 homes without the assumed Expressway.
24. O&H considers that there is currently insufficient technical information provided by Highways England or their consultants to make anything other than a theoretical judgement on the impact of an Expressway route through the site (as indeed, the Council has done).
25. O&H's view is that that the financial (including CPO) and environmental impact of any Expressway route which runs at surface level with grade separated junctions from M1 J13 south of MK through the allocation site is likely to mean it is unacceptable to both MKC and central government. Our consultants' initial assessment and knowledge of the area suggests that an alternative solution which either undergrounds all or a significant part of the section of route around MK, or which seeks to upgrade the A421 through Milton Keynes, is a more likely route outcome. If the latter, then the capacity of the site will be unaffected by the Expressway; if a decision is made to underground parts of the route to minimise environmental impact on Woburn Sands/Bow Brickhill, then the site is likely to be affected to a lesser degree than currently assumed by MKC's analysis.
26. In either instance, the capacity of the site would remain within the range identified by MKC. Thus, from a capacity perspective for policy making purposes, the quantum of development proposed in SD13 could be considered robust with or without an Expressway.
27. It is understood that Highways England has not objected to the allocation on the grounds that it would prejudice the delivery of an Expressway.
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**Q5.21 Are there other infrastructure interdependencies, how do they relate to the phasing of development, are they made clear in the Plan and have they been adequately taken into account?**

28. There are no other infrastructure interdependencies which present an overriding constraint on delivery or phasing of the site. The site can be accessed from the existing highway network and access can be made on foot/cycle and by vehicle to the existing Woburn Sands Station. Green infrastructure (including green buffers, landscape and ecological mitigation) can be delivered within the allocation boundary, and 'community infrastructure' to meet the needs of the new community (schools, local centre and open space) can be met on site.
29. Notwithstanding the above, the extent to which the strategic allocation safeguards, contributes to or delivers part of the wider strategic infrastructure network has been discussed with the Council since 2016. This relates specifically to the following:

**(i) Strategic Highway Connectivity**

'Grid road reserves' (land safeguarded for future grid road connections) are in place at various points within the urban area as part of adopted local plan and LTP policy. These include a reserve for the V11 southwards through Old Farm Park to the railway; a reserve for the V10 eastwards through Wavendon Gate and the consented Church Farm development; and two reserves within the Strategic Land Allocation (SLA) to the east of the SEMK allocation site (east of Newport Road) to safeguard future connections of an H10 extension back onto the A421.

Although Policy CT8 of Plan:MK requires "*opportunities for extending the grid road system and redway super network route into any major new development areas*", the Council has not allocated any new grid road reserves on the Policies Map as part of strategic allocations (and indeed, the draft Policies Maps do not appear to have included the existing grid road reserves as set out above).

As a result, the policy position is weakened and the current position appears to be that the routeing, delivery, funding or any cross-border agreement over strategic routes/connections is not to be fixed through local plan policy but is to be left to be agreed for sites within the MK local plan area through negotiated positions in the Development Frameworks for each site (and for sites within/adjoining Central Bedfordshire, through ongoing cross-border discussions on individual development proposals or planning applications).

This is borne out by Proposed Modification 36 (para 5.24 of the Plan) which states that "*a comprehensive transport strategy shall be established through the Development Framework process to ensure that appropriate access to and from the site, and connectivity of the southern areas of the site to the city, is achieved in line with other policies within the plan and the aims and objectives of the Council's Mobility Strategy. This will set out what other strategic and local highway connections should be provided and how these will be delivered, including between the A421, H10, A5, V10 and V11*"

O&H has prepared a full planning application for an extension of the H10 grid road eastwards from H10, through Church Farm to connect with the northern part of the allocation site to form part of the longer term strategic highway network in this part of Milton Keynes.

This grid road connection is not essential in traffic terms to secure appropriate site access to the northern part of the allocation site (which can be secured via Newport Road). Nevertheless O&H remain committed to this project in order to assist MKC in delivering strategic highway infrastructure in this location to serve the needs of the wider area.

However, O&H can only do this once MKC has determined its preference for the routing of the remainder of the eastward extension of the grid road extension to complete the link between H10 and the A421 through the SLA grid road reserves.

The plan attached at Appendix 2 is provided as context to indicate one way in which these safeguarded reserves could be implemented to complete the strategic highway connections in the south east of the borough as part of a wider planned (cross border) development strategy, and how the H10 and V11 extensions might sit within this network. Since 2014, iterations of this plan have been submitted to MKC by O&H as part of each rounds of Plan:MK representations but no view or decision on routing or network completion has yet been forthcoming from MKC.

In respect of local site connectivity for vehicles, cycles and pedestrians and the design of on-site infrastructure, this will be negotiated and set out within the Comprehensive Development Framework document.

We suggest that as a minimum the Policies Maps are amended to reflect those grid road reserves already protected through adopted policy. We also suggest MKC may wish to strengthen policy wording within point iv of CT8 to require new grid road reserves to be included on Policies Maps or revisions thereof.

**(ii) Woburn Sands Station and East West Rail**

The development will be designed to be well connected and integrated with adjacent Milton Keynes grid squares, public transport networks and the strategic and local highway network. Connectivity north and south of the railway will need to promote and achieve positive sustainable transport links in line with the Council's Mobility Strategy, and O&H has indicated to the Council and Network Rail that long term opportunities can be explored to provide land within the allocation boundary for an expanded/relocated railway station to the immediate west of the existing station at Woburn Sands.

Proposals for the upgrade of the railway line as part of the East West Rail (EWR) scheme currently subject to the Transport and Works Act Order (TWAo) process do not adversely impact on the wider site. The rail line is being retained along its current alignment through the site and Woburn Sands station is being retained as a station on EWR, but no further physical improvements are planned as part of the TWAo works beyond platform extensions within Network Rail land ownership.

The current TWAo proposals include the provision of an accommodation bridge for farm vehicles to be constructed by Network Rail along the line of the current at-grade Woodley's Farm Crossing. This accommodation bridge will enable enhanced pedestrian/cycle links across the railway to be put in place and integrated into the site design.

It is intended to continue discussions with MKC and Network Rail in the context of the drafting of the Comprehensive Development Framework in respect of any future safeguarding of land within the site for rail related uses.

**Q5.23 How will uncertainty about deliverability of the SEMK allocation be addressed and mitigated if necessary? Is there evidence to support SEMK being able to sustainably come forward in two distinct sites, north and south of the railway?**

**(i) Site Deliverability**

30. It is important that the SD13 allocation is planned comprehensively in order to deliver the full range of infrastructure requirements sought by MKC and local communities and stakeholders.

31. Having said that, it is anticipated that the site will come forward as two or more separate outline planning applications which may or may not run concurrently. The timing and phasing of these applications is likely to depend upon the progress of decision making and project/design progress on the Expressway and MK's strategic highway infrastructure network set out earlier in this Statement and also the extent to which the various land promoters are willing/able to progress development in advance of a final decision on these matters.
32. In its previous representations in 2017, O&H suggested that dividing the allocation site into two distinct parts may be a potential solution to enable the early delivery of the northern part of the site (which at that time was not anticipated to be affected by the Expressway alignment), with the southern part of the site coming forward once the Expressway routing had been progressed further.
33. However, the latest corridor options for the Expressway (May 2018) have widened rather than narrowed the area under consideration, and whilst it remains our opinion that an at grade Expressway route north of the railway would not be acceptable in planning/environmental (environmental impact) and cost terms (CPO), no evidence has been provided by Highways England to support this assertion.
34. Therefore at this stage, the current wording of para A of SD13 (PM38) remains an appropriate policy response to the current position with regard to the Expressway project. It does not preclude the progression and approval of a Comprehensive Development Framework document, nor the submission of one or more planning applications within the site, which will help speed up the approval and implementation process once a routing decision is made.
35. O&H intends to submit an outline application for all or part of its landholding within the allocation once the routing of the Expressway is progressed further. Nevertheless, O&H and Gallagher/Gladman are working with the Council in the preparation of a Comprehensive Development Framework document for the site. This can build in scenarios with and without a safeguarded Expressway route if necessary, so that applications can move quickly to approval once progression is made.

**(ii) North and South of the Railway**

36. The masterplanning of the site will evolve through the Comprehensive Development Framework document in order to appropriately provide for a distribution of uses and site layout for the whole allocation site which addresses site constraints and opportunities, key development parameters and site requirements, mitigation and s106 obligations as set out in Policy SD13.
37. The expectation is that in design terms, the parcels north and south of the railway line can be delivered as two distinct neighbourhoods, following the pattern of development established in the planning of Milton Keynes, where local facilities and services are provided in local centres within each neighbourhood ('grid square') but walking and cycling links are provided between adjacent neighbourhoods to access higher order or neighbouring/complementary facilities.
38. Thus, it is anticipated that primary school provision will be provided in each neighbourhood (one to the north and one to the south of the railway) as part of local centre/community facility provision, with secondary school provision (with opportunities for dual use sports provision) provided on-site in a location which takes into account the wider distribution of existing, expanded and planned secondary education in the wider south east MK area, as well as planned provision in adjacent administrative districts.

**Q5.24 Are the specific policy requirements in Policy SD13 justified and deliverable? Are the infrastructure requirements clearly set out (particularly education and health) and having regard to the LIP is it clear what developers are expected to provide to overcome constraints? Would the Proposed Modifications (Including PM38) be necessary for soundness?**

39. We do not object to the principle of the inclusion of a criteria-based policy wording for SD13 in respect of site requirements.

40. We note that site specific infrastructure requirements for the development are also set out in other policies of the Plan (for example, in terms of health provision, this is to be provided in accordance with the requirements of Policy EH5 and specifically having regard to a Health Impact Assessment which will measure the wider impact on healthy living and the demands that are placed upon the capacity of health services and facilities arising from the development). And in respect of public open space provision, the proposed development will need to meet the requirements of policy EH7 including its requirements for the delivery of adequate provision of playing pitches, parks and open space, as well as sports and active recreation provision.

41. However, we have comments around the soundness of the detail of two of the criteria for SD13 as currently drafted:

- (i) We object to the specificity of the requirements for education provision in point B.1 (see para 42-44 below);
- (ii) We have made representations to the inclusion of point B.4 (gypsy and traveller pitches) in previous consultations. Our comments in response to Inspector's Question 5.27 provide more details (see para 52-55 below);

Whilst we do not disagree with the Proposed Modification to PM38 in respect of the change to the wording of the last sentence of point C, we do suggest that some clarification over the CDF content may be required if this change is to stand (see para 45-49 below);

***Suggested Additional Minor Modification to wording of Policy SD13***

42. O&H wish to suggest an additional Modification in respect of point B.1 of policy SD13 in order to make sound the policy criteria in respect of education provision for the site.

43. PM38 suggests adding a new point B1 to specify a list of exact requirements in respect of education provision to serve the development. We do not agree that this is justified or reasonable, for the following reasons:

- (i) It assumes a fixed development quantum/capacity (which generates the need for a fixed quantum of school places). As evidenced elsewhere, the precise capacity of the site is not fixed and depending on land required for safeguarding of an Expressway route, could deliver between c. 3,000 and 3,500 dwellings, which will impact on the number of school places/forms of entry required;
- (ii) Similarly, the density and mix of development to be agreed through the CDF process may also affect the child yield generated and thus the number of places required;
- (iii) No evidence has been provided to explain how these requirements have been calculated, particularly taking into account other existing and planned education provision in the area (including planned school closures/expansions, permitted development in close proximity to the site, cross-border development proposals which include school provision and the impact of Central Beds Council's current plans to move from a three to two tier school system, to be decided during 2018);

- (iv) The extent to which these precise requirements will remain current, up to date and take account of other growth proposals coming forward within the plan period at the time applications for this site are granted and s106 obligations agreed.

44. On this basis, we do not consider the Council's Proposed Modification to introduce this level of specificity for education provision is sound. We suggest that to rectify the position, point B.1 should be deleted and replaced with the following wording:

**"B1. Make provision for education facilities to meet the needs of the proposed development in respect of primary and secondary education as well as nursery and early years provision. Any new schools provided on site should be capable of dual use as community facilities"**

***Timing of CDF and Planning Permissions (SD13 point C)***

45. O&H do not object per se to Proposed Modification PM38 in respect of the change to the wording of point C to require approval of the CDF prior to application *approval* rather than prior to application *submission*.
46. However, we do consider that because of the likelihood of separate applications being submitted for parts of the site at different times/sequences (and potentially, applications for parts of the site being granted before others are submitted), there is a need for the CDF 'headlines' to be substantially prepared and settled between the parties before submission of applications so that one process does not conflict with another in terms of 'first principles'.
47. One way in which this might be resolved in practice is for an 'outline' or 'Part 1' CDF to be approved prior to submission, which sets out the high level/'structuring' principles for development (which for this site could be around broad distribution of land uses, principal connections, location of green buffers, and Heads of Terms for provision of land/contributions for site-wide infrastructure). Other aspects of the CDF (such as those around density and layout issues, design criteria/codes, primary infrastructure design etc) could be worked through to approval in parallel with consideration of the outline application(s) and approved prior to the determination of these applications.
48. We suggest that if this approach is agreed, the wording of the last sentence of SD13 could be expanded to read:
- "A Comprehensive Development Framework (CDF) for the site will be prepared in accordance with policies SD1, SD11, SD12 and INF1. A Part 1 (or 'outline') CDF fixing high level development principles, broad distribution of land use and Heads of Terms for delivery of site-wide infrastructure will be approved by the Council prior to the submission of planning applications, with a Part 2 CDF addressing all other matters will be and approved by the Council prior to planning permissions being granted"**
49. Conversations are ongoing between MKC and the land promoters in respect of these aspects of the CDF, and it may be that this or similar alternative/expanded form of words for point C can be agreed in the SoCG between the parties and confirmed to the Inspector.

**Q5.25 Will the separate identities of Bow Brickhill, Wavendon and Woburn Sands and settlement fringe sensitivities in general be adequately protected through the Plan's policies?**

50. It is agreed that criteria 3 of SD13 is an appropriate requirement to build into the masterplanning of the site and that the prevention of coalescence with existing settlements is

an appropriate and positive design response. This is a design approach that was embedded in the original design rationale for Milton Keynes and has been proven to have served well to protect and enhance the distinct character of existing hamlets, villages and towns over the years since MK's inception.

51. The functionality, character and visual appeal of individual villages and towns has been maintained and enhanced in MK by the sensitive assimilation of landscape, green buffers, parks and waterways into a green framework for the new city, whilst maintaining connectivity and accessibility between established and new communities.
52. For SEMK, buffers and green infrastructure have been used as primary structuring elements shaping the development of high level conceptual master plans for the site and these will be fixed through the Comprehensive Development Framework process in consultation with local stakeholders and communities. Specific design approaches to determine the appropriate scale of buffers and the relationship between new development and features on site (such as the railway line, landscape and ecological features) will be carefully considered through the masterplanning process.

**Q5.26 What will be the impact on the landscape character of the Greensand Ridge, the function of the site as part of the green infrastructure, openness & tranquillity of this part of the Borough, biodiversity and the special interests of Bow Brickhill church and Danesborough Iron Age Fort? Can any potentially adverse impacts be satisfactorily addressed?**

53. Whilst lying to the north of the Greensand Ridge and being overlooked by it, the site is set against the backdrop of the new city of Milton Keynes, parts of which are clearly visible in wider views and which includes the railway and the A5(D). As such, it is considered that the site does not exhibit extensive openness and tranquillity, especially when compared with other parts of the borough.
54. There are two heritage features in the vicinity of the site: the Grade II\* Listed Church of All Saints, Aspley Heath, on higher ground c 700m south of the site, and the Danesborough Camp Scheduled Monument (SAM), the wider setting of which includes the allocation. The agricultural land within the site does not have a clear historical or functional relationship with either feature. However, any potential for views towards the church tower from within the site, or any potential inter-visibility between the hillfort and the site can be built into the design rationale for the scheme and addressed through site design and landscape planting.
55. Thus, these features are not considered to present an overriding constraint to the development of the site. The SoCG in respect of SD13 will provide further information in respect of this matter.
56. We have a number of comments and seek clarification from MKC relating to the extent and status of the wildlife corridor proposed along the line of the railway through the allocation site (the extent of the which is shown on the draft Policies Map and the policy protection for which is set out in paragraph 21.11 of Plan:MK). However, as this issue is to be dealt with in the Stage 2 Hearings (under Matter 8 Issue 4) we will provide a separate Hearing Statement on this matter.



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**Q5.27 Is the proposed allocation of 7 permanent gypsy/travellers pitches as part of this strategic site soundly based? How will this provision be delivered?**

57. We acknowledge the work done by ORS as part of the SHMA in determining the quantitative need for gypsy and traveller (G&T) pitch provision within MK, and have no reasons to dispute their conclusion in terms of the overall requirement for the borough.
58. However, we are not aware of any evidence which sets out the rationale and justification for the selection of this site for the provision of 7 pitches (paragraph 7.62) over other alternative locations within the Borough, including the expansion of existing pitches or those sites already confirmed for pitch provision.
59. We are strongly of the view that the introduction of G&T pitches within a new urban extension in close proximity to existing settlements (which in itself will need very careful and sensitive masterplanning to ensure the protection of existing settlement character) is neither sensible planning, the most appropriate location relative to existing provision, nor able to be justified by MKC.
60. In this respect, we do not consider the policy provision sound, and suggest the deletion of paragraph 7.62, and the replacement of point B4 within Policy SD13 (PM38) with the following wording<sup>1</sup>:

**"Contribute towards the provision of a Gypsy and Traveller site in Milton Keynes, with the scale of the contribution being agreed through negotiation. The contribution will be secured via an appropriate legal agreement";**

**Q5.28 Does Policy SD13 provide sufficient content to inform the preparation of a comprehensive development framework as required in Policy SD12?**

61. O&H considers that the criteria set out in Policy SD13 (as amended by PM38) is generally sufficient to inform the preparation of the CDF. As set out in our response to Question 5.21 above, O&H would welcome some further clarity from the Council in respect of the routing and safeguarding of land for strategic highway connections to be implemented by MKC in co-ordination with neighbouring authorities as part of planning for wider growth/strategic infrastructure delivery in this part of the Borough.
62. However, in the absence of this information, the objectives of policy CT8 and the need to address site infrastructure requirements through the CDF (which we presume will take into account MKC's wider infrastructure planning and how this site contributes towards these objectives) provide adequate policy content to inform and secure an effective CDF for the allocation which will then be a material consideration in any planning application proposals for the site or parts thereof.

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<sup>1</sup> For reference, this wording reflects an example of such a policy requirement in the adopted Peterborough Core Strategy, found sound and included as an urban extension policy criteria.

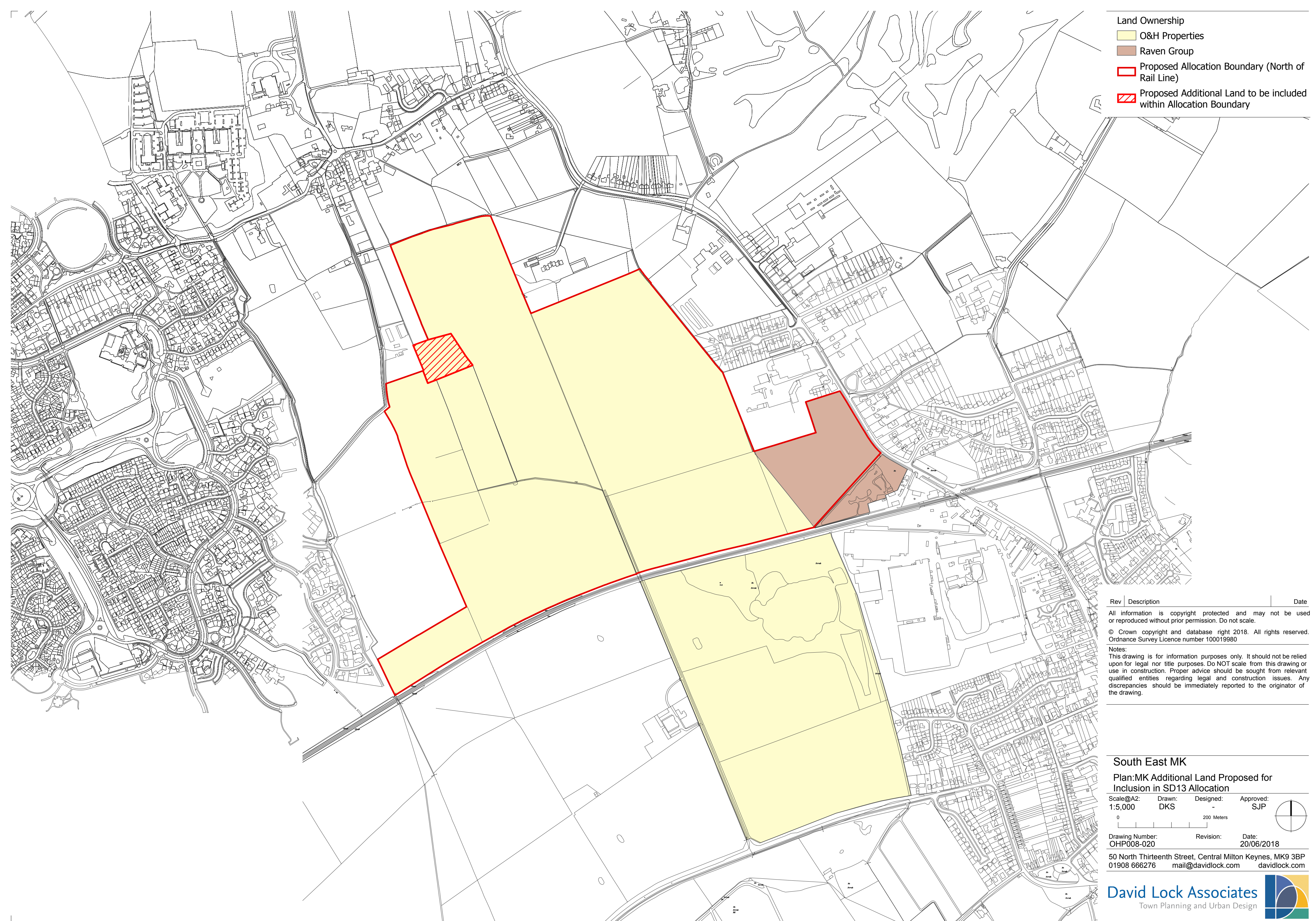
**Q5.29 Taking into account physical and planning constraints, infrastructure and land ownership, is SEMK capable of being delivered in a manner envisaged by Plan:MK? Is the allocation viable?**

63. Subject to the comments above, the requirements of Policy SD13, the proposed allocation boundary, and the requirement to prepare and agree a CDF prior to any planning approvals means that the characteristics of land ownership, physical and planning constraints and infrastructure safeguarding do not present any material impediment to the site's ability to deliver development as set out in Plan:MK.
64. In respect of viability, there are inevitably some significant development costs associated with the delivery of a sustainable urban extension of this scale, but nothing in the overall assessment of the development suggests that there is any impediment to delivery due to 'abnormal' development costs which would adversely impact viability.





**Appendix 1:**

**Plan Ref: OHP008-020 - Additional Land Proposed for Inclusion in SD13 Allocation**





Land Ownership

-  O&H Properties
-  Raven Group
-  Proposed Allocation Boundary (North of Rail Line)
-  Proposed Additional Land to be included within Allocation Boundary

Rev	Description	Date
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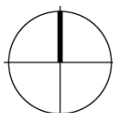
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## South East MK

Plan:MK Additional Land Proposed for  
Inclusion in SD13 Allocation

Scale@A2: Drawn: Designed: Approved: 

1:5,000 DKS - SJP



Drawing Number: OHP008-020      Revision:      Date: 20/06/2018

50 North Thirteenth Street, Central Milton Keynes, MK9 3BP  
01908 666276      mail@davidlock.com      davidlock.com

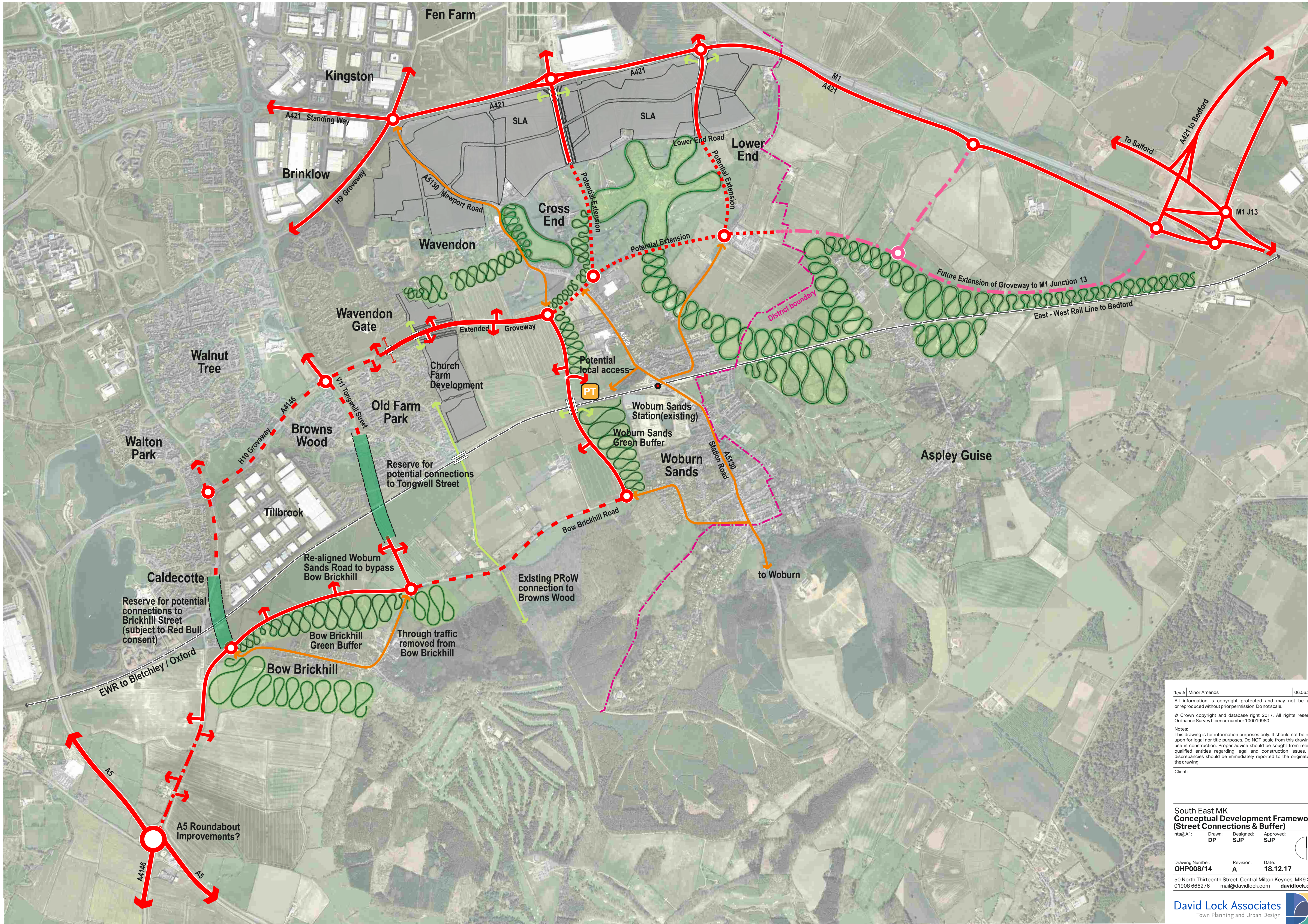
**David Lock Associates**  
Town Planning and Urban Design



**Appendix 2:**

**Plan Ref: OHP008-014 A – Context Plan (Wider SE MK Green and Grey Infrastructure)**





Rev A | Minor Amendments | 06.06.2018  
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Client:

South East MK  
Conceptual Development Framework  
(Street Connections & Buffer)

Drawn: DP Designed: SJP Approved: SJP

Drawing Number: OHP008/14 Revision: A Date: 18.12.17

50 North Thirteenth Street, Central Milton Keynes, MK9 3BP  
01908 666276 mail@davidlock.com davidlock.com

David Lock Associates  
Town Planning and Urban Design