

MILTON KEYNES COUNCIL RESPONSE TO INSPECTOR'S QUESTIONS FOR EXAMINATION HEARINGS – STAGE ONE

MATTER FIVE: STRATEGIC SITE ALLOCATIONS AND URBAN EXTENSIONS

QUESTIONS: Q5.1 – Q5.40

Issue 1 – general approach and principles (Policies SD1, SD11, SD12 & SD17)

Q5.1 Are the strategic site allocations as a whole consistent with the strategic objectives for Milton Keynes Borough? Are all the strategic sites technically ‘allocations’ or do some now have planning consent (particularly those carried forward from the Core Strategy and Eaton Leys)? What is the planning status of sites SD6, SD7, SD8, SD9 and SD15?

- 5.1.1. The Council considers that the strategic site allocations are consistent with the strategic objectives set out within Chapter 2 of Plan:MK. Outlined below are the specific strategic policies which the allocations directly support and some detail on how they assist in achieving these objectives:
- 5.1.2. Objective 2: The strategic site allocations will make a significant contribution to meeting the 26,500 housing requirement and providing the overall land supply of 29,604 homes over the plan period by delivering within or adjacent to the city.
- 5.1.3. Objective 3: Milton Keynes is location at the heart of the Cambridge-Milton Keynes-Oxford corridor. By allocating strategic sites that help meet our OAN and provide a buffer, the Plan is supporting growth within the corridor in line with the NIC’s recommendations. More specifically, the SE SUE and South Caldecotte Strategic Employment Allocation are well-located to take full advantage of, and support growth around, the East West Rail and Expressway regional infrastructure projects.
- 5.1.4. Objective 5: The South Caldecotte Strategic Employment Allocation specifically meets the requirement for B8 employment use over the plan period. This assists the Council in meeting its employment needs over the plan period, supporting the further growth of the local economy and providing enough jobs for the local population.
- 5.1.5. Objective 10: The strategic site allocations in compliance with the principles outlined within Policies SD1, SD11, their site specific policies, and policies relating to housing and infrastructure will provide well connected, high quality developments which have easy access to all services for those who live or work there.
- 5.1.6. Objective 11: The strategic site allocations will make a significant contribution to meeting the housing requirement and providing the overall land supply, including the approximate 10% buffer. The development of these allocations, in compliance with the place making principles, site specific policies and other policies outlined within Plan:MK, specifically those outlined in Chapter 7, Homes and Neighbourhoods, will

help to provide the range of housing that meets the needs of all sections of the community.

- 5.1.7. Objectives 12 and 13: The strategic site allocations ensure that new development is located away from areas of flood risk and significant biodiversity, and through developing the sites in compliance with policies outlined within Chapters 11, Managing and Reducing Flood Risk and 17, Sustainable Construction and Renewable Energy, they will mitigate the impact of new development on climate change. The SE SUE and South Caldecotte are also well-located in relation to the additional East West Rail services, and the MKE SUE includes a proposal for a fast mass transit system over the longer term, all of which offer significant opportunities for achieving a greater modal share for public transport and associated walking and cycling which will help to mitigate emissions from transport. The extension of the Redway network and other public transport services into the strategic allocations, in line with policies in the Plan further help to manage the increased travel demand and achieve a reduction in emissions.
- 5.1.8. Objective 14: Delivering growth through strategic sites provides the opportunity for significant new development and communities to be created on the foundations of current 'place-making' principles. Through outlining 'place-making' principles and policies within the plan that all the strategic site allocations will be required to comply with (e.g. Policies SD1, SD11, SD12 and any site specific policies), this will provide the basis to ensure that all new strategic site allocations will help to deliver the types of development envisaged in Strategic Objective 14.
- 5.1.9. Objectives 15 and 16: Whilst some of the strategic site allocations would involve the development of land that is currently designated as open countryside, and in some cases linear park extension, this is required to positively plan for meeting the needs of Milton Keynes. Their selection has been made partially on the basis that they would have the least impact upon matters such as landscape, green infrastructure and biodiversity compared to the other options available, as set out with the Sustainability Appraisal (MK/SUB/005). The development of the strategic site allocations will involve the retention and creation of strategic linear green infrastructure features (such as river corridors) and other green infrastructure and open space assets.
- 5.1.10. As outlined within our response to the Inspector's initial questions (INS1), a number of the strategic sites within Plan:MK are no longer allocations as they benefit from planning consent, these are sites previously allocated in the Local Plan (2005) and Core Strategy (2013). The table below outlines the current status of these sites.

Table with information on the number of dwellings on the Urban Extension sites mentioned in Policies SD6-SD9

Site	Expected number of dwellings on each site	Number of dwelling completions	Number of dwellings with REM and not yet completed	Notes
SD6: EEA (Broughton)	1530	1438	177	Entire site has reserved matters (REM) approval, with only 177 dwellings (dws) still to be constructed. There are more dwellings being delivered than suggested by the outline permission, as further sites have been developed for housing within the Broughton EEA area.
SD6: EEA (Brooklands)	2501	1136	1016	Final REM applications have now been submitted and it is likely these will be approved within the next few months. The whole site will then benefit from REM approval.
SD7: WEA (Area 10)	4320	415	801	Approximately 3,000 dws remaining with only outline permission.
SD7: WEA (Area 11)	2220	546	557	Approximately 1,100 dws remaining with only outline permission.
SD8: SLA	3079	34	859	Approximately 2,180 dws remaining with only outline permission.
SD9: Newton Leys	1650	1050	525	Approximately 60 dws remaining with only outline permission.

Note: Dwelling numbers at 1 April 2018.

5.1.2. With regards to Eaton Leys (SD15), this site is an existing housing commitment as shown in Table 18.1 (Appendix A) of the plan, as the site has outline planning permission under MKC Ref 15/01533/OUTEIS. It is no longer an allocated strategic housing site. To avoid any confusion about the status of Eaton Leys, a modification was proposed in INS1, to remove the third bullet-point in para 5.17 of the plan.

5.1.2. Aside from the sites covered by policies SD6 – SD9 and SD15, none of the other strategic site allocations within Plan:MK have planning consent.

Q5.2 Overall, has the approach to the allocation of the new strategic housing sites in Policies SD13-15 been based on a clear, robust process of site assessment and informed by sustainability appraisal? Are the reasons for selecting the preferred strategic sites and rejecting others clear and sufficient? Would any inaccuracies in the assessment significantly undermine the overall conclusions?

5.2.1. The process of giving consideration to strategic site options in isolation is reported in Sections 6.3 and 6.4 of the SA Report. A range of site options were identified (Table 6.2) and subject to 'screening' (Table 6.3), leading to identification of a shortlist of sites that were subject to an informal appraisal against the SA framework (Table 6.4; and Appendix III). On the basis of this work, two sites - SEMK and East of M1- were progressed to the next level of analysis, namely appraisal of spatial strategy alternatives (Chapter 7 of the SA Report). In light of the appraisal, the Council selected its preferred approach (Chapter 8 of the SA Report). On this basis, it is considered that reasons for selecting the preferred strategic sites and rejecting others clear and sufficient.

5.2.2. Finally, in respect of question (iii), it would be fair to conclude that any inaccuracies in the assessments could significantly undermine the overall soundness of the Plan, such that there is a need for modifications (i.e. the removal or addition of one or more sites and/or modifications to policy wording).

Q5.3 Are the generic policy requirements for strategic sites in policies SD1, SD11, SD12 & SD17 justified and effective? Are the various proposed modifications to Policies SD1, SD11, SD12 and SD17 necessary for plan soundness (See PMs 23, 24, 34, 35 & 50 in MK/SUB/004)?

5.3.1. All 4 policies represent the continuation of similar policies within the Local Plan (2005) and Core Strategy (2013) which have been used to successfully deliver the sustainable development of Milton Keynes during previous plan periods

5.3.2. We feel that policies SD1, SD11 and SD12 are justified and effective in so far as they assist in the delivery of sustainable development and provide clarity to developers in outlining the locally specific principles for which all strategic development sites should adhere to. These policies also provide the detailed principles that will ensure that new developments help to achieve the strategic objectives outlined within Chapter 2 of Plan:MK. Furthermore, these policies will assist with the timely delivery of

development through providing developers with an upfront understanding of the necessary principles their developments will be required to accord with.

- 5.3.3. Policy SD17 is an important policy in outlining how the Council intends to continue to actively engage with neighbouring authorities to ensure effective outcomes on cross-boundary issues. The Council recognises the likelihood of development proposals coming forward on sites immediately adjacent to the Borough boundary and seeks through Policy SD17 to provide a positive approach to joint working with our neighbouring authorities by outlining, up front, the key principles that the Council will put forward for consideration. It is intended that this will provide a mechanism to ensure constructive engagement on cross-boundary issues throughout the plan period.
- 5.3.4. It is not felt that any of the proposed modifications suggested for these policies are necessary for plan soundness, they are predominantly to provide clarity, further detail or to strengthen specific elements of the policy. Check with JC/AT

Q5.4 Are any of the strategic sites in Flood Zones 2 or 3? Are the allocations consistent with paragraph 100 of the NPPF which states that Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change?

- 5.4.1. Of the new strategic allocations within Plan:MK, none of the sites are fully within either Flood Zone 2 or 3. The only strategic site which contains elements of Flood Zones within the site boundary, is Land East of the M1, for which elements of both Zone 2 and 3 exist along the course of the River Ouzel which flows through the site.
- 5.4.2. However, land impacted by flood zones on this site is not proposed for development and is to be retained as open space flood plain and, as per the existing linear park land within Milton Keynes, will form part of a strategic, integrated approach to managing flood risk on the site. This conforms with policy in the existing Milton Keynes Development Plan and both the proposed flood risk related policies (FR1 and FR2) and place-making principles for development (SD1) within Plan:MK, which do not allow for development within flood zones 2 and 3. The presence of flood zones 2 and 3 on this site does not therefore impact upon the proposed capacity of the site, neither in terms of housing or employment land.
- 5.4.3. Of the other strategic sites within Plan:MK which already have planning consent, the EEA (SD6), Newton Leys (SD9) and Eaton Leys (SD15) also contain areas of flood zones 2 and 3 within their site boundaries, however this has been dealt with through their

planning consents in line with existing Milton Keynes policy and again no development was allowed within these zones.

- 5.4.4. It is therefore felt that all the allocations within Plan:MK are consistent with paragraph 100 of the NPPF.

Issue 2 – Milton Keynes East (MKE) (Policy SD14)

Q5.5 Based on all the evidence, is the Plan positively prepared in respect of MKE and is the identification of this long term strategic site/direction of growth adequately justified? Are the references to MKE as a long term option post 2031 justified?

- 5.5.1 The identification of MKE as an allocation for post-2031, subject to potential earlier delivery should strategic infrastructure be funded and delivered within the plan period is justified on the following grounds.

Significantly boost housing land supply

- 5.5.2 The Council's Sustainability Appraisal (MK/SUB/005) concludes that the MKE would have a number of significant positive effects, particularly in relation to the supply of housing and infrastructure. However, as noted in the Sustainability Appraisal, there is no certainty that the necessary strategic infrastructure required to make the site deliverable within the plan period could be funded. Therefore, whilst it performs equally well to the SE SUE and is sequentially preferable to other urban extensions that were appraised, the Council considers the positive and reasonable approach is to allocate the site for delivery post-2031 but allow for earlier delivery subject to certain criteria being satisfied.

- 5.5.3 The Council is proactively working with the site promoters to secure funding, currently via the Housing Infrastructure Fund, to fund such infrastructure and make the site deliverable within the plan period. If this is successful and development of the site can proceed prior to 2031, it would significantly boost the supply of housing within Milton Keynes over and above the OAN, consistent with national planning policy and the NIC's recommendations to Government to radically increase housing growth along the caMKox arc (MK/INF/004).

Enabling strategic scale infrastructure delivery

- 5.5.4 The scale of the MKE SUE has the potential to enable the delivery of strategic social infrastructure to serve the needs of the new community and potentially the wider

area. This is particularly the case with education and health, where the MKE SUE could enable the delivery of secondary education and strategic health facilities that can serve communities beyond the site. As noted elsewhere, the Council is seeking additional funding to enable delivery of the MKE in the plan period, and a portion of this funding is likely to be used to help fund social infrastructure within the site.

Transport

- 5.5.5 The MKE SUE has been assessed within the strategic transport modelling that has informed the preparation of the Plan. Scenarios 2 and 2b within the MKMMM Impacts of Plan:MK report (MK/TRA/004) test 3,000 dwellings (Scenario 2) and 5,000 dwellings (Scenario 2b) alongside the creation of 6,330 jobs. These two scenarios included 'built-in' mitigation in the form of a new vehicular bridge crossing and a network of distributor roads throughout the site that would alter the current pattern of routes immediately east of the M1. The conclusions of the modelling indicate that congestion and delay at Junction 14 of the M1 would worsen under both scenarios over and above that occurring under the Reference Case 2031, but that the "built in" mitigation measures associated with MKE would accommodate the majority of additional movements across the M1. The Council and Highways England agree that the modelling provides a robust strategic assessment of the traffic impacts associated with potential allocations within the Plan, and that the impacts identified to date are not insurmountable and can be managed through a range of transport and highway interventions (MK/SUB/008).
- 5.5.6 The Council has tested a package of additional mitigation measures associated with Junction 14 and a number of other junctions on wider local road network (Technical Note 21 Plan:MK East of M1 Mitigation Testing which has been provided to you reference INS1d). This concludes that the measures generally help reduce the delays for traffic travelling between the M1 and Central Milton Keynes, but that due to the grid structure of the local road network, congestion and delay in some cases is transferred to other parts of the network.

Environmental constraints

Flood risk

- 5.5.7 The River Ouzel runs south north through the central area of the site, forming a significant design constraint within the site yet given the size of the site, approximately 85% of it lies within Flood Zone 1. The Council considers that housing and other built development can be restricted to Flood Zone 1 in line with Policy FR1

of the Plan and national planning policy and guidance and still achieve the indicative 3,000 – 5,000 dwelling capacity of the site can be brought forward.

Landscape

- 5.5.8 The site resides across Land Areas 4, 5 and 6 assessed within the Council's Landscape Sensitivity Study to Residential Development 2016 (MK/ENV/001), for which the Council's draft Landscape Character Assessment 2015 was the primary evidence base (subsequently published as final as MK/ENV/002). Areas 4 and 6 are appraised as having low sensitivity and capable of accommodating residential without affecting key characteristics and/or values in this landscape. Whilst area 5 is appraised as having medium sensitivity, the study concludes that "The more open landscape on the lower slopes of the Ouzel valley, in proximity to the A509 London Road and the North Crawley Road are less sensitive to residential development." The lower slopes referred to coincide with where development within the MKE would occur.

Heritage

- 5.5.9 Within the site there is only one designated heritage asset, the Grade II Listed Coach House Hotel (formerly Moulsoe Buildings Farmhouse). There are a number of Archaeological Notification Sites within the western part of the site. Just beyond the site is a collection 11 Listed Buildings within Moulsoe, including the Grade 1 Listed Church of St Mary which c 250m from the closest boundary of the MKE site. There is also the Grad II Listed Tickford Park Farmhouse which sits east of the site and north of Moulsoe. Further way from the site are a collection of five Listed Buildings west of the M1 in Willen (including the Grade I Listed Church of St Mary Magdelene) and three Listed Buildings in Broughton (including the Grade I Listed Church of St Lawrence).
- 5.5.10 The assets outlined above are not considered to present an overriding constraint to the development of the site. The Development Framework will set out an overall design response and more specific measures to guide applications in order to avoid or mitigate any harm to these heritage assets, their setting or special interest, consistent with Policy HE1 of the Plan, the NPPF and the Planning (Listed Buildings and Conservations Areas) Act 1990. This is also reflected in Historic England's representation which does not raise any in principle objections regarding impacts upon the Grade II listed building with the site, or the designate assets beyond it (PSPMK478).

Ecology

- 5.5.11 The site includes the Wildlife Corridors associated with the ‘wet corridor’ of the River Ouzel running south north through it and the ‘road corridor’ associated with the M1. The site also includes the Biological Notification Site ‘Wood south of Wepener’, the designation of which indicates there may be the presence of certain habitats and species to warrant designation as a Local Wildlife Site subject to a more detailed assessment. The Council understands that further survey work is being commissioned by the site promoters to gain a current understanding of species and habitats within the site, but based upon the Council’s evidence, it considers that the ecological assets and constraints are capable of being accommodated in line with the mitigation hierarchy set out in Policy NE3 and its supporting text (see PM97 of the Council’s Schedule of Proposed Modifications (MK/SUB/004)) in such a way that it would result in a net gain to biodiversity and would not affect delivery of the site.
- 5.5.12 In summary, the Council does not consider there to be any significant environmental constraints that undermine the justification for allocating the MKE SE as a long term strategic site that could come forward during the plan period.

Q5.6 Is the overall size of the allocation and the quantity of development proposed appropriate? Is the proposed extension of the allocation in the proposed modifications (PM44) necessary for plan soundness? What would this modification mean in terms of site capacity and any delivery within the plan period?

- 5.6.1 The size of the allocation has the potential to deliver around 5,000 homes. The Council considers that extending growth of the urban area across the M1 can only be achieved via a strategic release of land, rather than smaller parcels or piecemeal development, to facilitate the delivery of strategic social infrastructure. This is supported by the conclusions within the Council’s Sustainability Appraisal. Furthermore, progressing growth at this scale enables a comprehensive master planning process to take place so that the creation of new neighbourhoods and communities are guided by a framework that helps meet the strategic objectives of the Plan and the key planning and design policy requirements within it, particularly those set out in Policies SD1 and SD11. It also enables the Council to consider how the MKE allocation could be future proofed to aid the delivery of further growth east of the M1 beyond the plan period and the MKE allocation, considering other land that has to date been promoted for development in this area and the growth ambitions of Government and the NIC for the caMKox Arc.

- 5.6.2 The proposed extension to the MKE is not considered necessary to make the allocation or the plan sound. The reason for its proposed inclusion is to provide greater flexibility when exploring appropriate layout and design solutions via the Development Framework process, and to provide land that could allow the early delivery housing should funding be secured for strategic infrastructure to make the site deliverable in the plan.

Q5.7 What is the latest situation on the HIF funding bid in relation to this site? Does this provide a justification for revisiting the development trajectories for this site for both homes and employment? With or without HIF funding is there any certainty that some development could be bought forward at MKE within the plan period?

- 5.7.1 The Council received a letter from the Ministry of Housing, Communities and Local Government (MHCLG) on 8 May 2018 outlining the next steps for its HIF bid. The letter was set out in Appendix C of the Council's response dated 3 June to your initial observations and questions (INS1a). This is the latest information available to the Council on the process of taking forward its HIF bid. At present, the Council's provisional view is that it will work towards submitting a bid in December 2018. Other than the recent information provided by the MHCLG referred to above, the circumstances surrounding this site have not changed that would fundamentally affect the role or status of the MKE SUE as explained within the Proposed Submission Plan:MK, October 2017 or Housing Land Supply Topic Paper. The Council therefore has not altered its working trajectory for the MKE SUE, and has not included it within the Plan's housing trajectory.
- 5.7.2 As noted in the Council's response to Q5.6 above, if funding is secured next year via the HIF or indeed from other sources within the early part of the plan period, then parts of the MKE SUE could be delivered within the plan period. To this effect, the Council proposes a modification (AM52) to Policy SD14 to clarify that development of the site prior to 2031 does not solely rely upon the fate of the HIF bid, and that other sources of funding for strategic infrastructure to make the site deliverable in the plan period would be equally valid. The proposed modification to the first paragraph of Policy SD14 is set out below for ease of reference. It is also included with the signed Statement of Common Ground between the Council and the Berkeley.

“Development ~~will not~~ can commence ~~until after~~ before 2031 ~~unless the Council's bid to the Government for~~ if any necessary strategic infrastructure required to make the site deliverable within the plan period can be funded ~~ing is successful~~ and delivered. In that circumstance, the development of the site will be allowed to proceed...”

- 5.7.3 Based upon securing the HIF funding in March 2019, the Council estimates that housing completions could begin in 2023 with an estimated 3,000 homes being delivered by the end of the plan period. The Council’s position as set out in Policy SD14, and subject proposed modification AM52, is that development will not commence on site without securing funding to deliver the strategic infrastructure the Council considers is required to make the site deliverable within the plan period.

Q5.8 Noting the proposed modification, are there any other reasonable options for consolidating this strategic option that could expand delivery east of Milton Keynes, including in the short to medium term?

- 5.8.1 At this time, there are no other reasonable options for expanding or consolidating the MKE SUE for possible delivery during the plan period in line with Policy SD14 (subject to proposed modification). Land adjoining the MKE SUE to the south east has been promoted to the Council; however this option was discounted during the initial sifting stage within the Council’s Sustainability Appraisal due to the complexity of bringing forward a strategic allocation that straddles the boundary between two Milton Keynes Council and Central Bedfordshire Council, and it therefore being less sequential preferable to other strategic options.

Q5.9 Are the criteria in Policy SD14 justified and effective? Are the infrastructure requirements clearly set out and is it clear what developers are expected to provide to overcome constraints?

- 5.9.1. As noted above, the criteria restricting delivery of the site until strategic infrastructure can be funded and delivered to make the site deliverable in the plan period is considered to be a sound basis for seeking bring forward the site in a sustainable way consistent with policies in the Plan that require development to be supported by necessary infrastructure.
- 5.9.2. The site-specific criteria of SD14 are considered to be justified and effective and are addressed below. The requirement for the provision of employment reflects the Council’s response at Q4.3 that it would welcome a mixed use development with

employment coming forward in addition to other sources of employment land supply during the plan period.

- 5.9.3. The criteria for the provision of social infrastructure and amenities reflect the potential scale of development and the associated need to deliver strategic scale infrastructure and amenities in an appropriate way. However, given the uncertainty around if and when the site could come forward sooner and the evolving status of the HIF bid when preparing the Plan, it was not possible to be more precise within Policy SD14 about the extent or scale of such infrastructure, for instance the how many forms of entry would be required for primary and secondary education, which would be needed during the plan period. This is why more general references have been used. The requirement for a phased introduction of transport infrastructure and connections to the H4 and V11 provides a clear indication on what principal routes into the city are considered to be acceptable in planning and highways terms. Highway matters within and beyond the site and will be worked through in more detail via the HIF and Development Framework processes. However, the progress made to date on the HIF process and in preparing a draft Infrastructure Delivery Plan (MK/INF/007) alongside the Local Investment Plan has developed a better understanding of what the likely social infrastructure requirements may be should the HIF bid be successful in 2019 allowing housing to come forward from 2023 onward. Whilst this information will continue to evolve, the Council is open, under your guidance, to preparing a proposed modification that reflects the current understanding.
- 5.9.4. Criteria relating to housing mix, footpath and cycle links and a strategic landscape framework set a clear expectation that development of the site will provide these in accordance with other Policies within the Plan, notably SD1, HN1, HN2, CT2, CT3, NE4 and NE5. Further guidance on how these requirements could be met will be set out within the Development Framework which will be adopted as a Supplementary Planning Document.

Q5.10 How will the site connect, particularly by walking, cycling and public transport, to (a) CMK and Newport Pagnell; (b) other strategic employment areas; and (c) potential Expressway corridor?

CMK, Newport Pagnell and employment areas

- 5.10.1. There is an existing footpath (014) which runs from the junction of Marsh End Road and Willen Road in Newport Pagnell, into and through the MKE SUE before crossing the M1 and joining Tongwell Street. At this point it links into the established Redway

network within Milton Keynes providing segregated and maintained routes for pedestrians and cyclists across the urban area, including to the network of Redway Super Routes. This offers quick and direct access to Blakelands, Tongwell, Fox Milne, Brinklow, Magna Park and Eagle Farm employment areas on the east of the city, as well as to Central Milton Keynes and Kingston centres and Denbigh North further to the south. Development of the site offers opportunities to build upon and extend the network of redways into and across the MKE SUE. This will be worked through via the Development Framework process.

- 5.10.2. The site is currently has three bus routes running through it, two of which provide services between Central Milton Keynes and Newport Pagnell with the third providing services between Bedford and Cranfield and the Broughton, Brooklands and Kingston within Milton Keynes. Development of the site provides an opportunity to increase patronage of these services improving their viability, as well as the opportunity to amend the routes so that they connect into the development parcels across the site as appropriate. This again will be worked through via the Development Framework process.

Expressway

- 5.10.3. In parallel with preparing the Strategy for 2050 and preparation of the Mobility Strategy, and at the invitation of the National Infrastructure Commission, the Council has devised a strategy to deliver first-last mile modal shift to connect with the new East West Rail services and the Expressway to widen the capability to travel into Milton Keynes by other modes than the car. The creation of a fast mass-transit system through the MKE SUE and eastward toward Cranfield creates opportunities for extending this out to the existing A421.

Q5.11 What is the 'fast mass-transit system' and is safeguarding a route for it justified?

- 5.11.1. A fast mass-transit system (e.g. Micro Metro or East West Rail and East West Expressway multi-modal smart hubs at strategic park and rides) is a mode of transport which would ensure that key new strategic development sites, for example, Land east of the M1 (Policy SD14 – Milton Keynes East) are efficiently and effectively connected with CMK and the wider borough (e.g. educational facilities such as Cranfield University).
- 5.11.2. In June (2018), Milton Keynes Council responded to a Call for Proposals for Transforming Cities Funding, which included a conceptual plan showing where mass

transit routes could be provided, a copy of which is appended to this report. These routes would run at grade, along existing road corridors which would be reconfigured to realise the benefits mass transit can deliver. These at-grade routes would be complemented by a high speed, segregated, limited stop fast mass-transit system which would connect Central Milton Keynes with MKE and Cranfield with the ability for this to potentially extend further east to the Expressway and East-West Rail corridors thereby providing inter-connectivity with the wider caMKox. Milton Keynes Council has currently commissioned a study to look at how this system might operate, including an assessment of routes and technologies etc. This study is expected to be completed by the end of 2018. This approach concurs with the ambitions and objectives of Milton Keynes Council Local Transport Plan (LT3); Mobility Strategy for Milton Keynes (LT4) (2018-2016) and Milton Keynes Futures 2050 Commission report (e.g. provide an effective network).

5.11.3. It is considered that the safeguarding of a route through the MKE site is integral to protecting the ability for such a service to be delivered in the future and not compromise the ability for Milton Keynes to fulfil its ambitions of becoming a world class and well connected city. By safeguarding a route to provide a fast-mass transit system this also relates to the Housing Infrastructure Fund Bid that the Council recently bid for and has been successful in reaching the second stage. If successful, this will help to achieve some of the national objectives in terms of housing delivery.

5.11.4. In terms of national policy, the Council considers that this achieves the objectives of sustainable development as referred to in paragraph 14; the core planning principles outline in paragraph 17 and the requirements for local plan-making set out in paragraphs 151 and 152 of the NPPF. Furthermore, this aligns to the Planning Policy Guidance paragraph: 001 Reference ID: 12-001-20170728 which indicates that local plans should address the needs and opportunities for the housing, the economy and community facilities and infrastructure. In turn, working to safeguard the environment, adjusting to the impacts of climate change and secure good design.

5.11.5. For the reasons outlined above, it is therefore the position of the Council by safeguarding a route for a fast mass-transit system e.g. land at east of the M1, this is a justified approach.

Q5.12 Are there potential transport implications arising from MKE for communities in Central Bedfordshire and, if so, has this formed part of the Duty to Co-operate dialogue?

- 5.12.1. The Impacts of Plan:MK Report (MK/TRA/004) indicates the traffic flows eastward toward communities within Central Bedfordshire are modest and would not have a material impact on the local road network there. As such it is not considered to be a strategic cross-boundary issue that warranted discussion with Central Bedfordshire as a Duty to Cooperate issue in itself.
- 5.12.2. This will need to be reviewed, as generic 'NTEM' projections of growth in Central Beds was used when undertaking the work. Since the work was completed in autumn of 2017, Central Bedfordshire have finalised their strategic site allocations including a strategic allocation at Marston Moretaine. Incorporating this into the base line assumptions would enable a more accurate assessment of the change in traffic conditions.

Q5.13 Has the MKE location been considered as part of the MKMMM Local Model validation work and the Traffic Forecasting Report?

- 5.13.1 The MKE location was considered as part of the model validation, in that the model was set up to test extensive development in this area. Specifically, this included adding extra zones to the base model and incorporating an area of 'simulation' network in and around the MKE location to permit greater modelling detail than is typically used to represent the surrounding areas more remote from Milton Keynes
- 5.13.2 The MKE location is however predominantly east (outside) the outer cordon of counts used in the model calibration, which runs broadly in line with the M1, and intercepts the main road through the MKE area, the A509, immediately west of M1 Junction 14 (although it does include Willen Road, the other roads through the site, east of the M1). This means that the accuracy of the Base A509 flows north of the M1 would require an independent check as they did not form part of the LMVR. The model validation here may therefore be a little less accurate than in other areas, however there is substantially less network to validate in the MKE area, being a largely green field site with only the A509 and Willen Road crossing it. Both the A509 and Willen Road to the east of the M1 were included on specific routes in the journey time validation.
- 5.13.3 In general the overall calibration and validation statistics for the Base model were favourable in terms of the DfT's WebTAG guidance, but would require further detail than the published results to inform the standard in specific individual areas.

Q5.14 Are there any implications of growth to the east of MK on air quality in Olney (A509 traffic)? What is air quality monitoring revealing at Olney and would growth at MKE be at odds with measures identified in any relevant Air Quality Action Plan?

- 5.14.1 The concentration of nitrogen dioxide within the Olney AQMA has fallen over the last 3 years to below the objective level (40 ug/m³ annual mean). In 2017 the maximum recorded level was 36 ug/m³. Should this concentration be maintained or fall further, the AQMA will be revoked within the next two years. The DfT has an Automatic Traffic Counter just south of Bridge Street in Olney that counts and classifies every passing vehicle. There has been no significant increase in traffic flows through Olney over the last seven years; the annual average daily traffic (AADT) count is approximately 17,000 vehicles/day.

- 5.14.2 We are not aware of any projected traffic growth figures that take account of the MKE development. There are no specific measures in the Olney Air Quality Action Plan that would be compromised by the development, however, the Action Plan can be amended at any time should the need arise.

Q5.15 What will be the impact on the landscape character, biodiversity or any other special interests? Can any potentially adverse impacts be satisfactorily addressed?

- 5.15.1. As noted at Q5.5, the site is appraised as largely having low sensitivity and capable of accommodating residential without affecting key characteristics and/or values within the Council's Landscape Sensitivity Study to Residential Development (MK/ENV/001). What impacts there are upon the landscape character can be addressed through the Development Framework process and more detailed design proposals to successfully mitigated them in line with the guidance set out in the Landscape Sensitivity Study and Policy NE5.
- 5.15.2. As also noted under Q5.5, the Council does not considered there to be any significant ecology or heritage constraints upon the development that would affect its capacity of delivery. What impact may arise from development upon identified assets is considered to be capable of mitigation in line with Policies HE1, NE1, NE2 and NE3.

Q5.16 Does Policy SD14 provide sufficient content to inform the preparation of a comprehensive development framework as required Policy SD12?

- 5.16.1. The requirements of Policy SD14 (subject to proposed modifications) relate to the fact that it is a long term strategic allocation with the potential to come forward during the plan period, and to the specific circumstance surrounding the connectivity of the site to the existing Milton Keynes urban area. The flexibility of the policy wording was intended to enable the preparation of the Development Framework to be responsive to the HIF process and the content of the bid. However, as noted under Q5.9, further information on the social and highway infrastructure requirements had been developed as part of the HIF bid process and the preparation of a draft Infrastructure Delivery Plan (MK/INF/007). The Council is therefore open to modifying Policy SD14 that reflect the latest information (although mindful that it is still evolving), under your guidance.
- 5.16.2. Alongside Policy SD14 are a range of other plan policies that will also guide the preparation of the Development Framework, in particular SD1, SD11, CT2, EH1, EH2, EH5, CC4 and INF1. In addition, the Council has recently published a draft

Infrastructure Delivery Plan alongside the Local Investment Plan that sets out in further detail the strategic level infrastructure that development of the MKE SUE will be expected to enable the delivery of. This will equally inform the preparation of the Development Framework. As such, the Council considers that Policy SD13 (subject to proposed modification MM) is sufficient to guide the preparation of the Development Framework. However, should you be minded to recommend the addition of criteria that provides further site-specific guidance in support other more general policies, in particular EH5 and CC4, then the Council would be open to preparing a modification to this effect.

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?

- 5.17.1 The SE SUE as an extension to the urban edge of Milton Keynes is capable of becoming an integrated new neighbourhood of the city. Work is continuing via the Development Framework process to specify how the requirements of Policies SD13, SD1, SD11 and SD12 alongside other thematic policies in the Plan will be met to ensure that the SE SUE achieves this.
- 5.17.2 Set out below are the key reasons that justify the allocation as a key strategic element of the Plan that significantly helps meet its identified housing needs and achieve sustainable development.

Contribution to OAN and housing land supply buffer

- 5.17.3 The allocation would make a significant contribution toward meeting the OAN. It also forms a significant portion of the overall housing land supply over the plan period (between 10.2% and 11.9%)¹. The Sustainability Appraisal (MK/SUB/005) concludes that the SE SUE, as part of Options 4, 6 and 8 (with the Plan lying between Options 4 and 8, and potentially Option 8+ with respect to the MKE SUE), has a significant positive effect in respect of 'Housing' and SA objective 5 in particular.

¹ The range relates to the possible capacity of between 3,000 and 3,500 homes within the SE SUE (see response to Q5.18 and Q5.20) and the adjusted housing land supply of 29,500 indicated in document MK/SUB/004 - the Proposed Schedule of Modifications, March 2018.

Enabling strategic scale infrastructure delivery

- 5.17.4 The scale of the SE SUE has the potential to enable the delivery of community infrastructure on site to serve the needs of the new community and potentially the wider area, unlike other smaller alternatives (including a reduced SE SUE allocation) that have been appraised in the Sustainable Appraisal (MK/SUB/005). This is particularly the case with education and health, where the SE SUE can enable the delivery of a new secondary school and health centre that can serve communities and Woburn Sands, Bow Brickhill and the committed scheme at Eaton Leys.
- 5.17.5 Progressing an allocation and Development Framework for the entirety of the SE SUE rather than a smaller allocation or postponing delivery of part of the site, enables the site to be master planned as a whole and increases certainty in the delivery of shared infrastructure, such as a secondary school, health centre and parks. This is particularly relevant given the site straddles a railway, meaning that infrastructure provided one side of the railway is likely to serve households on the other side. Master planning and seeking the delivery of the site as a whole will ensure that connectivity infrastructure can be designed and delivered accordingly to maximise shared social and green infrastructure.
- 5.17.6 The Council has now published a draft Infrastructure Delivery Plan (MK/INF/007) alongside the Local Investment Plan (MK/INF/001) to set out the infrastructure requirements for the SE SUE in more detail. The Whole Plan Viability Study (MK/INF/006), which has assessed a large scale greenfield urban extension typology similar to the SE SUE, concludes that there are no fundamental questions regarding the viability of delivering an urban extension like the SE SUE. Site-specific viability testing will be undertaken as part of the Development Framework process to take account of the detail set out within the draft Infrastructure Delivery Plan to further refine the conclusions of the Council's Whole Plan Viability Study for this site and inform decisions on infrastructure provision (both on and off-site) and the phasing of housing to support delivery of infrastructure.

Transport

- 5.17.7 The SE SUE is in close proximity to two railway stations (Bow Brickhill and Woburn Sands) which will provide access during the plan period to improved rail services to and from Oxford, Central Milton Keynes and Bedford. Beyond the plan period, from additional services to Cambridge will be available. This has a positive effect in contrast to other reasonable alternatives as noted within the Council's Sustainability Appraisal

(MK/SUB/005), reflecting the significant opportunity to achieve a greater public transport mode share for those living within the SE SUE.

- 5.17.8 The Council has undertaken strategic transport modelling to inform the preparation of Plan:MK. Scenario 2a resembles the strategy set out in Plan:MK in terms of Plan:MK growth to the south of the urban area in addition to committed growth included within the Reference Case 2031. The conclusion reached for Scenario 2a states that:

“In terms of impacts over and above the Reference Case as with Scenario 1 there are limited additional congestion issues forecast to be caused by the [Scenario 2a] growth.”

- 5.17.9 This indicates that the 2,000 homes south of the railway would have minimal additional traffic impacts over and above the existing commitments. It also notes that:

“Scenario 2a has little impact on Bow Brickhill level crossing, in terms of flow and delay with a maximum flow circa 900 PCU using the crossing which is within an acceptable volume for the crossing to accommodate given the train service frequency assumed.”

and that

“Although there is significant extra housing growth, the impacts are mitigated by the new link between H10 and Bow Brickhill Road bridging the railway line just to the west of Woburn Sands, and the additional road network linking H10 through to A5130 (Newport Road).”

- 5.17.10 A key assumption in this regard is the provision of a new road bridge over the railway alongside a new road network through the SE SUE. The Council is undertaking further transport modelling to test a range of highway network assumptions to better understand the influence that a new road bridge(s) would have on traffic flows and congestion in the area and at the level crossings in particular. Notwithstanding this, the Council considers that a new road bridge would be important from a place making perspective and, as noted in the Council’s Sustainability Appraisal, would be of benefit to the wider transport network. The Council is making the inclusion of a new road bridge a base assumption until the further modelling work is completed.

- 5.17.11 With regards to the Expressway, the Council has been mindful during the preparation of the Proposed Submission Plan:MK October 2017 that it could affect the SE SUE. The

Council was equally mindful of needing to progress Plan:MK in a way that does not prejudice the delivery of what would be a significant infrastructure investment that benefits Milton Keynes. For these reasons, Policy SD13 restricts the granting of planning permission until it is known for certain whether the SE SUE would be affected by the Expressway. Via the Development Framework process, the Council will be examining how development could proceed within the SE SUE should the assumed Expressway (see Q5.20 below) be routed through it. The Council considers that this policy approach is justified, effective and the most appropriate way to manage the uncertainty of the Expressway whilst positively planning to meet housing needs and infrastructure to support new communities.

No significant environmental constraints

BMV

5.17.12 The SE SUE includes areas of Best and Most Versatile agricultural land, including some land classed as Grade 2. Natural England in their representations to the Proposed Submission Plan:MK October 2017 (PSPMK898) have not raised any in principle objection to the soundness of the plan, by allocating the SE SUE, on grounds of BMV agricultural land. Instead they have requested that a new policy be included in the plan to ensure the impacts upon BMV agricultural land are considered as part of the planning application process, and that additional references to BMV land be included within the site allocation policies, including Policy SD13. The Council is proposing a new Policy NE7 on how development proposals should be considered in relation to BMV, and therefore does not consider it necessary to add further references to Policy SD13 regarding BMV.

5.17.13 The Council considers that development of the agricultural land within the SE SUE is justified as it makes a significant and appropriate contribution toward meeting the Council's Objectively Assessed Need for Housing relative to other alternatives, as evidenced in the Council's Sustainability Appraisal (MK/SUB/005). The Council has commenced work on a Development Framework that will set out the principles, framework and distribution of land uses within the SE SUE. As part of this work, site constraints including the BMV land will be taken into account so that the design response "*seeks to use areas of poorer quality land in preference to that of a higher quality*" in line with paragraph 112 of the NPPF and the proposed Policy NE7 of the Council's Schedule of Proposed Modifications (MK/SUB/004).

Flood risk

5.17.14 The vast majority of the site is located within Flood Zone 1. The Caldecotte Brook and its tributaries extend into land north and south of the railway which include land which is flood zones 2 and 3. Given the relatively very small areas of flood zones 2 and 3 and where these occur, the Council considers that housing and other built development can be limited to areas of Flood Zone 1, without affecting the capacity or delivery of the site, in line with Policy FR1 and national policy and guidance.

Landscape

5.17.15 The Council's Landscape Sensitivity Study to Residential Development 2016 (MK/ENV/001), for which the Council's draft Landscape Character Assessment 2015 was the primary evidence base (subsequently published as final as MK/ENV/002) appraises the site as having low landscape sensitivity and capable of accommodating residential development without affecting key characteristics and/or values in this landscape within.

5.17.16 For Land Area 10 (north of the railway), Wavendon and Woburn Sands are noted as being vulnerable to change from development through coalescence. For Land Area 11 (south of the railway) it states that extensive development in close proximity to the Greensand Ridge could affect the perception of it as a key landform feature, its peaceful character and the contrast between it and the flat clay lands north of it; and that integrity of historic villages (Bow Brickhill and Woburn Sands) are vulnerable to change. However, the study suggests how these impacts could be avoided or mitigated. Policies within the Plan, notably Policy SD13 (subject to proposed modification MM2) and Policy NE5, provide an effective core policy framework alongside other policies such as HE1 and D1, to ensure the guidance contained within the Landscape Sensitivity Study is followed and other steps are taken to avoid and mitigate to an acceptable degree any landscape impact upon the Greensand Ridge (often referred to as the Brickhills, as is the case in PM1) and the identity of the adjacent villages.

Heritage

5.17.17 Within the site there are no designated heritage assets, however there is an Archaeological Notification Site towards the centre of the land south of the railway.

5.17.18 There are a number of designated heritage assets within the wider vicinity of the site. The Danesborough Camp Scheduled Monument is situated c 700m south of the site on higher ground. There is also a Motte Castle c 500m north east of the allocation and the Roman settlement of Magiovinium lies c 1.2km south west of the allocation, both

of which are Scheduled Monuments. The Grade II* Listed Church of All Saints, Bow Brickhill and Church of St Michael, Aspley Heath are situated on higher ground c 800m south and south east, respectively, of the site. The Grade II* Listed Church of St Mary in Wavendon lies c 250m north of the allocation. The Woburn Sands Conservation Area is situated within c 300m east of the allocation at the closest point. There are also a number of Grade II Listed buildings within the Wavendon, Woburn Sands and Bow Brickhill areas. The agricultural land within the site does not have a clear historical or functional relationship with any of these assets. The identification of non-designated heritage assets will take place as part of the Development Framework process and potentially via the Council's work to establish a MK New Town Heritage Register which would be equivalent to a 'local list' of heritage assets.

- 5.17.19 The assets outlined above are not considered to present an overriding constraint to the development of the site. The Development Framework will set out an overall design response and more specific measures to guide applications in order to avoid or mitigate any harm to these heritage assets, their setting or special interest, consistent with Policy HE1 of the Plan, the NPPF and the Planning (Listed Buildings and Conservations Areas) Act 1990. This is also reflected in Historic England's representation which does not raise any concerns regarding impacts upon the Scheduled Monuments (PSPMK477).

Ecology

- 5.17.20 The site includes an area of designated Wildlife Corridor which runs along each side of the railway and extends to cover an area of open water and deciduous woodland (priority habitat) south of the railway and adjacent to the built-up area of Woburn Sands before narrowing and extending further to Bow Brickhill Road. Under the Plan and Policy NE1, Wildlife Corridors have the same status as County Wildlife Sites. The SE SUE is also in close proximity to the extensive woodlands associated with the Greensand Ridge, some of which is ancient woodland, which is designated as a Local Wildlife Site and priority habitat. The Council understands that further survey work is being commissioned by the site promoters to gain a current understanding of species and habitats within the site, but based upon the Council's evidence, it considers that the ecological assets and constraints are capable of being accommodated in line with the mitigation hierarchy set out in Policy NE2 and NE3 and its supporting text (see PM97 of the Council's Schedule of Proposed Modifications (MK/SUB/004)) in such a way that it would result in a net gain to biodiversity and would not affect delivery of the SE SUE.

5.17.21 In summary, the Council does not consider there to be any significant environmental constraints that undermine the justification for allocating the SE SUE, which would affect delivery of the allocation, or would not be capable of satisfactory mitigation. The estimated capacity and gross density of the site (between 15 and 17.5 dwellings per hectare) reflects the Council's assumption, in line with its SHLAA methodology, that a significant part of the site will not be developed in order to achieve compliance with the policies within the Plan, in particular those relating to landscape, heritage and ecology whilst still being capable of making a significant contribution to the OAN and enabling the delivery of strategic scale infrastructure to support new communities.

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)?

Size and quantity

5.18.1 As set out in Policy SD13, the proposed allocation is for 3,000 homes on a site of 200.7ha. Whilst the Council is open to revising the 3,000 homes figure, via a modification, in the light of further recent analysis of site capacity (see Q5.20 below), the proposed scale and capacity of the allocation is considered to be appropriate for three main reasons.

5.18.2 Firstly, the proposed allocation (3,000 homes on 200.7ha of land) equates to a gross density of around 15 dwellings per hectare. This is not significantly dissimilar to the Council's SHLAA methodology for strategic scale sites (17.5 dwellings per hectare), which assumes that a significant amount of land would be utilised for infrastructure, open space and mitigating the effects of development as part of a sustainable neighbourhood in line with Plan:MK, and Policies SD1 and SD11 in particular. Secondly, an allocation of this order would make a sizeable contribution toward meeting and providing a buffer beyond the OANH. Finally, the scale of the SE SUE has the potential to enable the delivery of community infrastructure on site to serve the needs of the new community and potentially the wider area, in contrast to other smaller alternatives (including a reduced SE SUE allocation) that have been appraised in the Sustainable Appraisal (MK/SUB/005) which are typically are too small to enable the provision of on-site strategic infrastructure. This is particularly the case with education and health, where the SE SUE can enable the delivery of a new secondary school and health centre that can serve communities and Woburn Sands, Bow Brickhill and the committed scheme at Eaton Leys. These positive aspects of allocating

the SE SUE at the proposed size and capacity are reflected in the Sustainability Appraisal which concludes that, as part of a diverse housing strategy and land supply, it performs well against the SA objectives and the strategic objectives set out within Plan:MK compared to other options.

Additional land

- 5.18.3 The Council, via PM1 and PM2 of the live 'Schedule of Proposed Policies Maps Modifications, 2018', have suggested the addition of two parcels of land to the allocation. PM1 relates to land within the middle of the southern part of the site, and PM2 relates to land on the eastern edge of the site north of the railway.
- 5.18.4 As the land referred to in PM1 is located centrally within the site, its inclusion would enable a greater range of design solutions to be explored, particularly with regard to the layout of routes through the site and the effective use of land within the allocation, which would enable a higher quality scheme to come forward.
- 5.18.5 Including the land referred to in PM2 generates greater opportunities to create more direct links from the SE SUE to Woburn Sands rail station for pedestrians and cyclists. It also offers alternative options for highway access into the site, should this be something that the Council and local stakeholders considered to be appropriate when discussing design solutions via the Development Framework process.
- 5.18.6 Gladman Developments Ltd and Gallagher Estates, in their representations to the Proposed Submission Plan:MK, October 2017 (PSPMK663), have suggested that further additional land should be incorporated into the allocation. The Council's view is that it is not necessary to include these parcels within the site in order for the allocation to be sound. However, as a consequence of the Development Framework process to date, the Council is exploring whether the use of the land within these parcels could help to achieve a higher quality scheme, in particular with regards to the highway strategy for the site and wider area, and whether or not their inclusion within the allocation would be necessary to realise these benefits. The Council will be able to provide an updated position on this ahead of the hearings.

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?

- 5.19.1 The Council considers that the trajectory for completions at the site is deliverable as a result of the project management approach adopted by the Council, with the support of the site promoters, to facilitate delivery of the SE SUE. This approach is outlined below.

Roadmap

- 5.19.2 MKC with the support of site promoters have prepared a document which maps, communicates and aids coordination of the work streams necessary to deliver the SE SUE, from preparation of the Development Framework through to the first housing completions. This includes mapping out and establishing milestones for technical work, stakeholder engagement, risk management, pre-application and application process, EIA, infrastructure works and site preparation.

Working collaboratively

- 5.19.3 The Council are working with sit promoters to understand how the policy requirements that need to be met will be delivered, and how key design and planning matters could best be resolved in order to build certainty on the delivery of the development in line with Plan:MK. As part of this process, the Council will also engage with key local and technical stakeholders during the Development Framework process so that they can inform and shape the Development Framework without prejudice to any objection they have to the allocation.

Risk management

- 5.19.4 The Council has identified the main risks to the delivery of the SE SUE as part of a proactive project management approach to preparing the Development Framework and progressing future planning applications. This has identified the key risks and issues outlined below. The Council is continuing to take steps and provide resource to manage and mitigate these risks to ensure delivery of the site is not delayed.
- Landownership constraints upon achieving access from the H10: there are a number of intervening landowners between the existing H10 and the SE SUE. The Council is currently in discussion with these parties to prepare a joint statement confirming their support for the SE SUE and working towards agreeing access rights to enable the H10 access.
 - Highway network and crossing the railway: Work is ongoing to inform a preferred highway strategy for the SE SUE and wider area in terms of managing traffic and congestion, achieving wider transport policy objectives and meeting

the place making principles set out in the Plan. Related to this is a need for Network Rail to agree to the provision of rights to allow the construction of a new bridge over the railway. Network Rail is also seeking a financial settlement as part of this on the basis of their Shared Value policy.

Front loading

- 5.19.5 As noted above, the Development Framework process is being used to understand and identify solutions for a number of key planning and design matters that would ordinarily be left to the planning application stage, including how the main highway, education, health and community infrastructure requirements will be funded and delivered, and the preparation of a Design Code for the site as a whole. The Council and site promoters will also seek to use a pre-application process to further identify and resolve more detailed matters, for instance highway design, ahead of planning applications being submitted to minimise the need for subsequent information requests and the use of pre-commencement conditions. These steps will ensure that the subsequent planning application(s) will be capable of being determined in line with the principles established in Plan:MK and the Development Framework in a more efficient and timely way compared to the typical planning application process experienced elsewhere.

Planning process

- 5.19.6 The lead-in times for this site (outlined within both the submitted housing trajectory (MK/SUB/004a2) and the updated housing trajectory, submitted as part of the Council's response to Matter 3) are based on the assumptions outlined in the Council's response to Q3.31, recent evidence from similar sites and information submitted by the developers of SEMK.
- 5.19.7 The proposed lead-in times indicate outline approval being granted in 2020, the first REM approval in 2022 and first completions in 2023. This aligns with the lead-in times recently seen on the SLA, whereby outline permissions were granted in April 2015, the first residential REM at Eagle Farm in the SLA was granted in April 2017 and development started on site in February 2018. MKC and site promoters are discussing whether a hybrid application (outline for the site, full details for infrastructure work) should be the preferred approach to progressing applications, and indeed whether this could be extended to include full details for the first phase of housing. This would significantly shorten the planning process leading to the first housing starts on the site. Given the ongoing work to facilitate delivery of the SE SUE as outlined above and

the potential for a hybrid planning process, it is entirely reasonable that the lead-in times for the SE SUE can at least mirror those of the SLA.

- 5.19.8 In terms of delivery rates, the proposed forecasts assume a phased delivery within the two main areas that make up SE SUE with a number of housebuilders providing outlets simultaneously. It is forecast that completions will gradually increase on a yearly basis over the first 4 years of completions, until steadying out at a rate of 400-450 completions per annum from 2026/27 to the end of the plan period. This is based on an assumption of approximately 6 housebuilders working on site simultaneously during the peak delivery years, averaging a rate of approximately 66-75 completions per parcel/phase, per annum.
- 5.19.9 Completion rates of this scale and above have been seen in recent years on parcels across other existing strategic growth areas of Milton Keynes. For example in the 2017/18 monitoring year, 102 dwellings were delivered on one parcel in the WEA, 84 dwellings on a parcel in the EEA and 95 dwellings on a parcel at Oakgrove. Similar examples can be seen across the last 3 monitoring years. Furthermore after only 3 years of delivery, the WEA in 2017/18 provided 537 completions in total across the whole site. These provide recent examples that the proposed delivery rates on the SE SUE can be achieved if not bettered. It is therefore felt that reasonable delivery rates have been projected for the site.

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?

- 5.20.1 As noted in correspondence INS1a, the Council has undertaken an analysis of how the Expressway route may affect the site and the land take it would require. The Council has assumed a 100m wide Expressway route² for a dual carriageway that accommodates the highway infrastructure, drainage and buffers to adjacent land uses on both sides. This assumption is based upon current dual carriageway grid road design practices within Milton Keynes and a review of the existing A421 between the A1 and Junction 13 of the M1, where the distance from the central reservation to

² Note that in the Council's letter dated 3 June 2018, it uses the term 'corridor' when explaining the analysis undertaken. To avoid mixing terminology that could lead to confusion, the Council suggests that the term 'Expressway Route' should be used when referring to the actual road and its paraphernalia and buffers which will be decided in Autumn 2020; 'Expressway Corridor' when referring to the A, B and C corridors Highways England are set to decide upon in 2018; and 'caMKox Arc' when referring to the wider geography of the growth and infrastructure initiative described by Government and the National Infrastructure Commission.

adjacent housing ranges from 25m to 150m. An alignment for the Expressway route through the site has been assumed on the principle that Highways England would seek an alignment that was as straight as possible, but avoiding existing buildings and the Green Sands Ridge.³ This results in an assumed Expressway route that is 2.98km long and 100m wide. In the absence of further detail from Highways England (due to the early stage of the Expressway project), the Council considers that these assumptions are reasonable and logical considering the design of the existing A421 and how housing is currently set back from dual carriageway grid roads within Milton Keynes, which provides an indicator of what is possibly acceptable in terms of safeguarding the amenity of adjacent housing.

- 5.20.2 The analysis indicates that the assumed Expressway route would take up approximately 29.8 hectares, leaving 170.9 hectares for development. Assuming 50% of the 107.9 hectares is available for housing at a net density of 35 dwellings per hectare (gross density of 17.5 dwellings per hectare) in line with the Council's SHLAA methodology, the Council considers that the site could accommodate around 3,000 homes with the assumed Expressway route running through it, and potentially around 3,500 homes without the assumed Expressway. Further work to establish a more refined figure based upon a more detailed consideration of constraints, mitigation and infrastructure requirements is ongoing via set forth the Development Framework process, but at this stage a capacity of 3,000 - 3,500 homes is considered by the Council to be appropriate and is open to preparing a modification to reflect this.
- 5.20.3 As also noted in INS1a, it is the Council's current understanding that all three prospective Expressway corridors (A, B and C) overlap the site. Therefore, the announcement of a preferred Expressway corridor in July/August 2018 will not provide any further certainty on whether or not the Expressway could be routed through the site.

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?

- 5.21.1 The only other infrastructure project that interrelates with this site is the central section of the East West Rail project. In February 2018, Network Rail consulted on proposed infrastructure works that would affect the stretch of line running adjacent to and through the site between Bow Brickhill and Woburn Sands to enable increased

³ The Council has not attempted to design an alignment that would satisfy DMRB standards as this exercise is considerate too onerous and disproportionate for the purposes of generating an indicative land take for a surface-level dual carriageway.

services along the railway. This indicated that Network Rail were considering maintaining the two level crossings close the SE SUE (Bow Brickhill and Woburn Sands) and providing an accommodation bridge over the railway within the eastern area of the SE SUE for use by farm vehicles from the within the land covered by the SE SUE. Network Rail expects to submit the Transport and Works Act Order at the end of July 2018 which will indicate what the final proposals are.

- 5.21.2 The Council is continuing to discuss the matter of road bridges over the railway with Network Rail and the Department for Transport in order to reach an agreement on the position, design, funding and shared value associated with a road bridge(s) as part of the development of the SE SUE. This matter has been identified as an issue that presents a risk to the delivery of the SE SUE, which the Council (with the support of the site promoters) is proactively seeking a resolution to with Network Rail and the Department for Transport.
- 5.21.3 At present, the Council has not yet determined a phasing strategy for housing and infrastructure on the SE SUE as this will be set out in the forthcoming Development Framework following further technical work. This will include site-specific viability testing that takes account of infrastructure items, such as schools, set out within the draft Infrastructure Delivery Plan (MK/INF/007) to further refine the conclusions of the Council's Whole Plan Viability Study for this site and inform decisions on infrastructure provision (both on and off-site) and the phasing of housing to support delivery of infrastructure.

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?

- 5.23.1 Please see the Council's response to Q5.19 with regard to how the Council is managing the risks that could delay delivery of the SE SUE.
- 5.23.2 With regard to the Expressway, the Development Framework process includes a high-level assessment understand how development could be delivered on the site in a 'with Expressway' scenario, as outlined under Q5.20. This work is being done to prepare the ground should the Expressway be routed through the SE SUE so that the Council and site promoters would not have to begin from scratch and would enable planning applications to proceed as required to fulfil the required trajectory for the site. This approach further links to the Council's approach within Policy SD13 (subject to proposed modification MM2).

- 5.23.3 The Council considers that the uncertainty associated with the Expressway would be mitigated to the greatest extent possible by use of the modified trigger clause within Policy SD13, by taking steps now to understand how the Expressway may affect the site and how development could be brought forward around it so as not to prejudice this significant infrastructure project, and by the wider project management approach being taken by the Council as outlined in its response to Q5.19.
- 5.23.4 Given the scale of the northern and southern areas (potentially 1,100 homes and 2,400 homes respectively) it is possible that these areas could form distinct developments with their own primary schools, community infrastructure and highway infrastructure being provided according to the needs of each respective site. However, it is the Council's view that a comprehensive scheme with appropriate connections between the northern and southern areas is desirable to enable the funding, delivery and accessibility of key infrastructure and services, most notably a secondary school, health centre and public transport network, to serve new communities both sides of the railway. Further, whilst the best way to provide local centres is a matter being explored via the Development Framework, the current working assumption is that there would be a single local centre that would be home to or adjacent to social infrastructure serving the needs of the entire site. This would increase the importance of delivering a comprehensive and connected scheme across both sites. Notwithstanding this, the Council accepts that areas of land north and south of the railway within the allocation could be brought forward in distinct phases ahead of the provision of shared infrastructure and connections. Phasing, on the basis of a connected and comprehensive scheme as set out in Policy SD13, is to be established via the Development Framework process.

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?

- 5.24.1 The Council's explanation of the requirements under section A of Policy SD13 relating to the Expressway is set out in its response to Q5.23 above. The Council's response on section B and C of Policy SD13 (on the basis of the proposed modification MM2) is set out below.
- 5.24.2 The requirement for education is based upon the Council's Reception year we use the Reception Year pupil yield ratio of 0.06 pupils per dwelling. This ratio has been derived from work undertaken by the Council to prepare the Pupil Product Ratio

Study 2017⁴. Applying this ratio to the 3,000 dwellings cited in Policy SD13 equates to 180 pupils in the reception year, which further equates to six Forms of Entry (30 places per form) across both primary and secondary education. At present, the Council's preference would be to meet this need via two 3FE Primary Schools and 7FE Secondary School (the additional 1FE being to accommodate need arising from the nearby Eaton Leys development).

- 5.24.3 The requirements relating to connectivity and highways are considered to be necessary in order to set the policy expectation that the SE SUE will be appropriately connected to the adjacent urban areas as well as pedestrian, cycle, public transport and highways networks. Whilst this would be expected of all development proposals in Milton Keynes, in line with Policy CT2, the fact that the land north of the railway is currently 'landlocked' from grid road network and the connectivity of land south of the railway is currently restricted due to the railway line and lack of grade separated crossings means it is reasonable and justified for Policy SD13 to set site-specific requirements around connectivity.
- 5.24.4 The logic for connectivity issues equally applies to landscape and the relationship with adjacent distinct settlements. As noted in the Council's response under Q5.17 and Q5.26, the SE SUE has low sensitivity to residential development in landscape terms and can be brought forward without significant harm to the wider landscape and the character and identity of adjacent distinct settlements. Nonetheless, development of the site will still need to take account of the sensitivities within the wider context of the site which are specific to this area of the borough. It is therefore considered reasonable and justified to include specific-reference to the need for respecting and reinforcing the Brickhills area, wider landscape setting and the character and identity of Bow Brickhill, Woburn Sands and Wavendon.
- 5.24.5 The Council considers it reasonable and justified to include explicit reference to the need to accommodate 7 pitches for Gypsies and Travellers within the SE SUE as this is a key part of the strategy for meeting housing needs within the borough over the plan period. The Council's response on the soundness of this approach is set under Q5.27 below.
- 5.24.6 Regarding the requirements of Section C of the Policy SD13, this is a strategic scale development that has a number of complex design and planning issues that need to be resolved via a collaborative and iterative process in order to develop the necessary certainty around delivery of the site and achieve a high quality sustainable

⁴<http://www.bing.com/search?q=Pupil+Product+Ratio+Study+milton+keynes&src=IE-TopResult&FORM=IETR02&conversationid=>

development that meets the specific and general policies within the Plan. A comprehensive Development Framework is considered to be an appropriate planning approach for achieving this.

- 5.24.7 Overall the requirements across sections A, B and C of Policy SD13 subject to proposed modification MM2, are considered to be sound. The Council considers that the proposed modifications are necessary for the reasons outlined below.
- 5.24.8 This proposed changes to Section A are made in the light of certain representations on Policy SD13 which indicated the wording was not flexible enough to accommodate earlier or delayed decisions on the Expressway as well as further information made available to the Council regarding the extent of the three Expressway corridors being considered by Highways England. This indicated that the corridor decision expected in 2018 could provide greater certainty on whether or not the Expressway could be routed through the site. The reference to 2019/2020 was therefore removed, instead taking a more flexible approach that could respond to changing circumstances and when increased certainty would be available on whether the site would be affected by the Expressway.
- 5.24.9 The proposed changes to Section B are made partly in response to a number of representations which argued the policy lacked detail when compared to other strategic site policies within Plan:MK, and because the changes are considered to make the policy more effective by providing additional clarity on site-specific infrastructure and design matters that the applicants and decision takers will be expected to respond to and consider when preparing and considering applications.
- 5.24.10 As for including further site-specific requirements for infrastructure, the Council has recently published a draft Infrastructure Delivery Plan (MK/INF/007) alongside the Local Investment Plan that sets out in further detail the strategic level infrastructure that development of the SE SUE will be expected to enable the delivery of. This will equally inform the preparation of the Development Framework. The Plan also includes Policy EH5 which requires all development proposals to provide or improve health facilities and services in order to serve the needs of the proposed development. As such, the Council considers that Policy SD13 (subject to proposed modification MM2), alongside the Infrastructure Delivery Plan (MK/INF/007) once finalised and other policies within the plan, provides sufficient clarity on what infrastructure the SE SUE will be expected to enable the delivery of. However, should you be minded to recommend the addition of criteria that provides further site-specific guidance in support other more general policies, in particular EH5, then the Council would be open to preparing a modification to this effect.

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?

- 5.25.1 As noted at Q5.18 above, the Council's Landscape Sensitivity Study to Residential Development (MK/ENV/001) notes that the integrity of historic villages (Wavendon, Bow Brickhill and Woburn Sands) is vulnerable to change. However, the study suggests that coalescence can be avoided with the villages by maintaining separation between new development and the villages, for instance by locating development within Land Area 10 next to the Strategic Land Allocation which is on the western and south-western boundary of Land Area 10.
- 5.25.2 Policies within the Plan, notably Policy SD13 (subject to proposed modification MM2) and Policy NE5, provide an effective core policy framework alongside other policies such as HE1 and D1, to guide the preparation of the Development Framework and subsequent planning applications and decisions to ensure these and other steps are taken as part of the hierarchy of measures to avoid and mitigate to an acceptable degree any impact upon the character and identity, including their setting, of adjacent villages and Conservation Areas.

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?

Landscape character

- 5.26.1 The Council's Landscape Sensitivity Study to Residential Development 2016 (MK/ENV/001), for which the Council's draft Landscape Character Assessment 2015 was the primary evidence based (subsequently published as final as MK/ENV/002), appraises the site as having low landscape sensitivity and capable of accommodating residential development. Regarding Land Area 10 which coincides with the area north of the railway within the SE SUE, and Land Area 11 which coincides with the area south of the railway, the prevailing conclusion for both is that they have low sensitivity and that "Residential development could be accommodated without affecting key characteristics and/or values in this landscape"⁵.

⁵ Section 6.11.4 and 6.12.4 of MK/ENV/001

- 5.26.2 Notwithstanding this, the study goes on to say of Land Area 11 that extensive development in close proximity to the Greensand Ridge could affect the perception of it as a key landform feature, its peaceful character and the contrast between it and the flat clay lands north of it. However, the study suggests how these impacts could be avoided or mitigated, such as development being be small scale, reinforcing the existing landscape structure to shield views from higher ground.
- 5.26.3 Policies within the Plan, notably Policy SD13 (subject to proposed modification MM2) and Policy NE5, provide an effective framework to guide the preparation of the Development Framework and consideration of planning applications (including the use of Landscape and Visual Impact Assessments) to ensure these and other steps are taken as part of the hierarchy of measures to avoid and mitigate to an acceptable degree any landscape impact upon the Greensand Ridge (referred to as the Brickhills in MM2).

Green infrastructure

- 5.26.4 The principal green infrastructure assets within the site are:
- Areas of open water and priority deciduous woodland situated on the eastern boundary of the site, south of the railway line.
 - Designated wildlife corridor that runs along both sides of the railway line within the site.
 - The Caldecotte Brook and its tributaries which extend into land north and south of the railway.
 - A network of hedgerows throughout the site.
 - Three footpaths and a bridleway, largely running north south through the site.
- 5.26.5 Beyond the site are a number of strategic green infrastructure assets, most notably the Greensand Ridge. These strategic-level assets are mapped out within the Council's Green Infrastructure Strategy 2018 (MK/ENV/007). As reflected in the Council's response to other matters within Q5.26, and to Q5.17 above, the Council will seek to protect and enhance the green infrastructure within the site and seek to create connections with the wider network green infrastructure via the preparation of a Development Framework to guide development in accordance with the policies within the Plan, but notably Policies SD1, SD11, FR2, NE1, NE4, L4 and Appendix C.

Openness and tranquillity

- 5.26.6 Of the thirty areas across and beyond the borough that were analysed in the Landscape Sensitivity Study to Residential Development, only seven were considered to have low sensitivity with only four of these within the borough of Milton Keynes. Of these four, two are Areas 10 and 11, with the others being Areas 4 and 25. Area 4 forms part of the MKE SUE allocation. Areas 10 and 11 have comparable result to Area 25 in terms of 'intervisibility' and 'perception/experience'. Therefore, the Council considers that as an urban edge option for residential development, Areas 10 and 11 are some of the most sequentially preferable within the borough in landscape terms.
- 5.26.7 The study's detailed conclusions on Areas 10 and 11 are set out below as further justification for the selection as locations that can accommodate residential development without significant impacts upon the landscape, including upon openness and tranquillity
- 5.26.8 The study describes Land Area 10, which coincides with land north of the railway within the SE SUE, as being:
1. Enclosed by mature hedgerow and hedgerow trees and of a low lying flat landform, although there are clear views out to the Greensand Ridge and the scarp slope.
 2. Enclosed on three sides by built development which creates an urban edge character, which is set to increase further once the Strategic Land Allocation is built out.
- 5.26.9 The study describes Land Area 11, which coincides with the land south of the railway within the SE SUE and adjoins the Greensand Ridge, as:
1. Being enclosed by high hedgerows and with a low lying flat landform which results in low intervisibility with the Greensand ridge.
 2. Being contained by settlement edges on three sides which creates an urban character with residential areas of Milton Keynes being visually dominant.
 3. Having audible intrusion from the traffic using Bow Brickhill Road.
- 5.26.10 Overall, both the 'intervisibility' and 'perception/experience', which broadly correlate with concepts of openness and tranquillity, of the area are found to be low within the study.

Bow Brickhill Church and Danesborough Iron Age Fort

5.26.11 As noted at Q5.17, the Danesborough Camp Scheduled Monument is situated c 700m south of the site on higher ground. The Grade II* Listed Church of All Saints, Bow Brickhill is situated on higher ground c 800m south of the site. Other designated assets are noted at Q5.17. Via the Development Framework, the overall design response and more specific measures will be explored and set out to guide applications in order to avoid or mitigate any harm to these two heritage assets, their setting or special interest, consistent with Policy HE1 of the Plan, the NPPF and the Planning (Listed Buildings and Conservations Areas) Act 1990. For instance, this could be achieved through site layout, restricted building heights, structural landscape planting and buffers and further mitigation measures as are deemed necessary and appropriate. However, based upon current evidence and knowledge of the assets, the Council considers that the proposed scale of development would not give rise to substantial harm to these two designated heritage assets or their settings.

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?

- 5.27.1. The Council has not been presented with or identified any other options via its previous Call for Sites undertakings that could provide land for the 7 pitches over the plan period. The proposed allocation for the SE SUE provides the only opportunity available to the Council to meet this need.
- 5.27.2. Notwithstanding the lack of alternatives, the Council considers that the scale of the land allocation at the SE SUE is capable of suitably accommodating a site for seven pitches in a way that is consistent with the traveller communities' common preference to reside separately from the settled community. Whilst subject to previous national policy, the soundness of the approach of allocating sites as part of a wider strategic urban extension was demonstrated within the Council's adopted Development Plan, with pitches provided within the Western Expansion Area and Newton Leys.
- 5.27.3. The Council currently owns and manages two Gypsy and Traveller sites within the Borough. The Council, in principle, would be willing to take ownership of a land parcel within the SE SUE, put in the services in and subsequently manage it.

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

- 5.28.1 The requirements under section B of Policy SD13 (subject to proposed modifications MM2) relate to the specific circumstance faced in bringing forward development within the SE SUE, namely strategic social infrastructure, connectivity, landscape character, relationship to existing settlements and the need to accommodate seven Gypsy and Travel pitches. This forms the core policy direction for the preparation of the Development Framework. Alongside Policy SD13 are a range of other plan policies that will also guide the preparation of the Development Framework, in particular SD1, SD11, CT2, EH1, EH2, EH5, CC4 and INF1. In addition, the Council has recently published a draft Infrastructure Delivery Plan (MK/INF/007) alongside the Local Investment Plan that sets out in further detail the strategic level infrastructure that development of the SE SUE will be expected to enable the delivery of. This will equally inform the preparation of the Development Framework. As such, the Council considers that Policy SD13 (subject to proposed modification MM) is sufficient to guide the preparation of the Development Framework. However, should you be minded to recommend the addition of criteria that provides further site-specific guidance in support other more general policies, in particular EH5 and CC4, then the Council would be open to preparing a modification to this effect.

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?

- 5.29.1 The Council's responses above, and in particular those to Q5.17, Q5.19, Q5.23, Q5.24, Q5.25 and Q5.26, provide the Council's considerations on these matters individually in detail. Taken as a whole, the Council considers that the site is relatively unconstrained, provides an opportunity to deliver growth that makes a significant contribution to meeting housing needs and providing a housing land supply buffer, is of scale that is capable of providing strategic scale infrastructure (particularly social infrastructure) and is well placed to benefit from regional infrastructure investment (most notably East West Rail).
- 5.29.2 The Council is fully aware of the risks to delivering this site and is open about these, as noted in its response to Q5.19. In response, the Council is proactively monitoring and managing these risks with the support of the site promoters through various means, but in particular by adopting a project management approach to delivering the site that encapsulates the process from plan making through to the discharge of

conditions and the first housing starts. The Council is therefore of the view that the allocation can be delivered as envisaged in the Plan.

5.29.3 With regard to viability, the Council's decision to allocate the SE SUE has been informed by the Whole Plan Viability Study (MK/INF/006) which indicated that the 'Strategic Green 1,000' typology, which most closely resembles the SE SUE allocation, achieves positive residual values once full account has been taken of the policy requirements set out within the plan. It is noted that the testing of this typology did not account for abnormal site-specific costs. The Council's Infrastructure Delivery Plan (MK/INF/007) outlines the main strategic infrastructure requirements and estimated costs, based on current evidence and knowledge of the site. There are no known abnormal development costs over and above these that apply to the SE SUE, although additional costs may need to be borne by the development due to landownership limitations relating to the H10 extension as well as seeking rights to provide a road bridge over the railway. Additional site-specific viability testing will be undertaken as part of the Development Framework process to further inform decisions on infrastructure provision (both on and off-site) and the phasing of housing to support delivery of infrastructure. However, based upon the Council's evidence and knowledge of the site at this stage, it considers that the allocation is viable.

Issue 4 – Campbell Park and Central Bletchley (Policies SD18 & SD19)

Q5.30 What is the planning status of various sites at Campbell Park? What is already committed and what additional development is allocated through Plan:MK? Is there an agreed masterplan that remains extant? Are the various sites that make up Campbell Park clearly identified? Are there any sites that are potentially undeliverable or would not be justified for inclusion? Conversely, have any sites/areas been omitted? Is there an appropriate plan, showing the various parcels intended for development at Campbell Park?

5.30.1. To assist with our answer it is first useful to outline briefly the recent planning history of Campbell Park. The Local Plan (2005), which was supported by the Central Milton Keynes Development Framework SPD (which included Campbell Park), envisaged the development areas within the Campbell Park area coming forward as part of a major mixed use development which provided a significant new destination for leisure and recreation that mixed homes, offices and live-work space, including a significant number of residential units. To this end, an outline application for the whole park area was approved in 2007 (Ref: 04/00586/OUT) and the objective of this development was carried forward in the Core Strategy (2013).

5.30.2. The 2015 CMK Business Neighbourhood Plan (CMKAP) (MK/EXAM/001) has subsequently replaced the CMK-specific policies in the 2005 Local Plan and currently provides the planning policy position for development in Campbell Park. There is currently no extant agreed masterplan for the Campbell Park area, only the specific policies/designations outlined within the CMKAP. The CMKAP in its Land Uses Proposals Map proposes mixed use development across Campbell Park, predominantly led by residential dwelling houses, but with elements of B1 and D1/D2 uses. The allocations within Plan:MK seek to allocate these parcels for residential-led development, but acknowledge that an element of mixed-use would be supported.

5.30.3. Additionally, in 2017 the Outline permission granted for Campbell Park expired with only a few sites having been delivered or received REM permission. Therefore, aside from those sites which were granted REM approval (Table below outlines these), the remainder of Campbell Park no longer has planning consent.

5.30.4. The below table outlines the current planning status of all sites within Campbell Park that are listed within Plan:MK and outlines whether they are existing commitments or allocations through Plan:MK.

Site	Status	No. of DWS at 1 April 2017	Notes
Campbell Park Remainder (Northside)	Commitment	1500	MKDP site with a preferred bidder as outlined in response to Q5.32.
Blocks 14A and 14B	Commitment	40	REM approval (13/01113/REM). Site was completed in 2017/18.
Canalside – Marina	Commitment	380	REM approval (17/00850/REM). Construction has now begun on site.
F4.4	Neighbourhood Plan Allocation	51	CMKAP allocates this for solely residential use; Plan:MK will carry this forward.
G4.1	Plan:MK Allocation	141	Mixed-use allocation in CMKAP, Plan:MK proposes residential

			allocation*.
G4.2	Plan:MK Allocation	202	Mixed-use allocation in CMKAP, Plan:MK proposes residential allocation*.
G4.3	Plan:MK Allocation	166	Mixed-use allocation in CMKAP, Plan:MK proposes residential allocation*.
Land to North of Glebe Roundabout, Overgate	Plan:MK Allocation	60	Mixed-use allocation in CMKAP, Plan:MK proposes residential allocation*.

* Plan:MK would support some mixed-use development on these parcels of Campbell Park, providing it is in the form of uses that would generally be expected within a residential area. The development is expected to be predominantly residential led compared to that which is designated within the CMKAP.

5.30.5. The above sites are identified within Tables 18.1 and 18.2 of Appendix A of the submitted plan and also have separate lines within the housing trajectory/schedule (MK/SUB/004a2) and updated trajectory/schedule, included as Appendix B in our response to Matter 3. Furthermore, the sites are clearly identified as proposed housing sites on the Plan:MK Proposals Map.

5.30.6. None of the Campbell Park sites included within Plan:MK are considered to be undeliverable or not justified for inclusion. With the exception of '*Land to North of Glebe Roundabout, Overgate*' all the sites are within the ownership of the Council's development partner, Milton Keynes Development Partnership (MKDP), who have expressed their desire to bring these forward within the plan period. Furthermore, recent progress made on both the Canalside – Marina site and the Campbell Park Northside site, both of which are also MKDP owned, provides evidence of this.

5.30.7 The remaining site, '*Land to North of Glebe Roundabout, Overgate*', is owned by the Parks Trust who have recently had a REM application (related to the approved OUT permission: 04/00586/OUT) for the site refused; this decision has now been appealed.

5.30.8 Furthermore, no sites within Campbell Park have been omitted from the plan with the exception of the above mentioned site "Land to the North of Glebe Roundabout, Overgate". The omission of this site from the submission plan was an oversight and it has been recommended for inclusion within the plan via a proposed main modification.

5.30.9. At this stage there is no plan contained within Plan:MK, aside from the proposals map, which outlines the parcels intended for development in Campbell Park. A plan showing all the proposed development sites listed above has been included within this response as Appendix A.

Q5.31 What density of development is assumed at Campbell Park? Has the capacity of the site been under-estimated? Should the density of development at Campbell Park be consistent with the CMKAP yield of 250 dwellings per hectare?

5.31.1. A density of 100 dwellings per hectare (dph) has been assumed at Campbell Park. Policy CMKAP G10 of the CMKAP states that the density of new housing development within CMK should be 250 dph, but should be 100-200 dph in the blocks surrounding Campbell Park. Within Table 4 of the Neighbourhood Plan, the capacity of sites within Campbell Park are calculated on the basis of either 100 or 200dph.

5.31.2. The decision, in Plan:MK, to assume a density of 100dph for all sites in Campbell Park was based on the density for the Crest Nicholson scheme at Sites H3 & H4 Campbell Park, the most recently approved residential-led scheme in Campbell Park. This scheme for 383 dwellings, which was approved in November 2017 (app ref 17/00850/REM), has a net density of 85 dph.

5.31.3. On the basis that our assumptions are consistent with policy outlined in the CMKAP and take account of recently approved development within the same area, we do not feel that capacity has been under-estimated.

Q5.32 What scale of development is anticipated at Campbell Park within the next five years and is this reasonable?

5.32.1. As outlined in the updated housing schedule/trajectory submitted as Appendix B of our response to Matter 3, it is anticipated that there will be a total of 740 homes delivered in Campbell Park within the next 5 years (2018/19 – 2022/23).

5.32.2. Of these, 380 units will be delivered on the Canalside Marina site which has REM approval and is currently under construction; the forecasts for delivery on this site have been provided by the developer.

5.32.3. A further 60 units will be delivered on a small parcel of land for which a REM application was refused in November 2017 and is currently at appeal. This site is forecast to be delivered in years 4 and 5 of the 5 year period.

5.32.4. The remaining 300 units form the first completions of a 1500 dwellings site, “Campbell Park Remainder (Northside)”, which is in the ownership of Milton Keynes Development Partnership (MKDP), the Council’s development partner. MKDP has appointed Crest Nicholson and a joint venture between Urban Splash and Places for People as preferred developers for the site and is currently in the process of drawing up detailed plans. The forecasts for this site have been provided by MKDP and given the number of developers involved it is felt that the expected annual completion rates are achievable.

5.32.5. For the above reasons, it is felt that the project scale of development at Campbell Park for the next 5 years is reasonable.

Q5.33 What does Policy SD18 add to what is already set out in the general principles for strategic principles and in Policy HN1 (Housing Mix) and the suite of design policies? Is it providing appropriate strategic direction and coordination at this key location?

5.33.1. Policy SD18 for Campbell Park is a short policy with two principles for the design of residential development and also refers to maintaining the role of the city park and improving links to it. Campbell Park is also the subject of a site specific policy CMKAP G4 (Campbell Park and its setting) in the CMK Alliance Business Neighbourhood Plan (CMKAP).

5.33.2. Upon reflection this policy does not provide appropriate strategic direction and coordination at this key location. We consider that the most appropriate strategic policy to manage development in Campbell Park is Policy SD1 (Place-making Principles for Development) rather than the general principles for strategic sites within policies SD11/SD12, which apply to strategic urban extensions. The suite of CMK strategic policies SD2-SD4 is also applicable.

5.33.3. In the circumstances we propose merging aspects of policy SD18 with policy SD3 partly because we can be much more specific about where new housing will be located and the housing numbers as amended in policy SD3 for CMK include Campbell Park. All the blocks on the northern side of Campbell Park from blocks F1.2-F1.4, G1.1-G1.3, G1.4H and H1.1 are proposed to be developed for housing and associated uses. The blocks on the southern side of the park F4.3 G4.1-G4.3, are also allocated for housing in Table 18.2 of Plan:MK. Additionally block G3.3 is expected to be developed for housing. To guide the development of this site a development brief for the site will be prepared by MKDP.

5.33.4. The Council proposes the following modification to policy SD3.

Modify the fourth paragraph of policy SD3, new text in bold and underlined and text to be deleted struck through. The text about the role of Campbell Park and links to it has been incorporated into policy SD3 from policy SD18

The new growth will be accommodated using a combination of the redevelopment of vacant, underdeveloped and under-performing sites ~~and~~ **including** the development of ~~the strategic reserve sites at~~ Block B4 **for further and higher education.** ~~and F1.2-1.4 identified in the CMK Alliance Business Neighbourhood Plan 2015. **Blocks F1.2-F1.4, G1.1-G1.3, G1.4H and H1.1 on the northern side of Campbell Park will be developed for largely residential purposes together other mixed uses appropriate to a residential area. On the southern side of Campbell Park, Blocks F4.3. G4.1-G4.3 and G3.3 will be developed for largely residential purposes with other mixed uses appropriate to a residential area.**~~

The role of Campbell Park as the main city centre park will be maintained and links to the park will be improved where opportunities arise. The impact of development proposals on the setting of the park will be considered in the determination of planning applications for those proposals.

Q5.34 What is the intended outcome of Policy SD19? How would development within Policy SD19 be assigned, if at all, to the housing land supply figures in Table 4.3? Is there evidence to positively identify opportunities for development within the SD19 area?

5.34.1. The intended outcome of policy SD19 is the transformational regeneration of Central Bletchley capitalising on the opportunities presented by East-West Rail.

5.34.2. The figure of 20,603 dwellings shown in Table 4.3 in Plan:MK includes sites in Central Bletchley, which have already received planning permission and are shown as existing housing commitments in revised Table 18.1 in the Council's letter to the Inspector dated 3 June (Plan:MK Examination – Council's Response to the Inspector's Initial Observations and Questions). An example of such a site would be land to the south of Princes Way & West Bletchley, which has planning permission for 184 dwellings subject to a S106 agreement. If additional housing is developed within the Central Bletchley Urban Design Framework Area (now referred to as the Central Bletchley Prospectus area) that housing would therefore count as a windfall. Our position is that any dwellings developed as the result of regeneration is additional to the proposed housing supply in Plan:MK and is not known at this stage.

5.34.3. A plan to illustrate development opportunities and sites within the Central Bletchley Framework/Prospectus area is attached as Appendix B to this response.

Minor Modification

In policy SD19 change 'Central Bletchley Urban Design Framework' in title of policy and in line 1 of the policy to **Central Bletchley Prospectus Area**

Change 'Central Bletchley Urban Design Framework' above paragraph 5.35 and in paragraph 5.35 to **Central Bletchley Prospectus Area.**

Issue 5 – Other Strategic Sites (Policies SD9, SD15 & SD19-21) and medium/small housing allocations (Appendix A)

Q5.35 What is the planning status of Newton Leys (Policy SD9)? What does its identification as a 'special area' mean? Is there certainty/clarity on the proposed link road within the site? Is this a strategic cross-boundary matter and part of the Duty to Co-operate?

5.35.1. Newton Leys has Outline planning approval, with the majority of the site also benefiting from REM approval (there currently remain approximately 60 dwellings which have only outline permission and not REM approval). As of 1 April 2018, 1050 dwellings have been completed and approximately 585 dwellings remain to be constructed.

5.35.2. Newton Ley's identification as a 'special area' is a carry forward from the site allocation within the Milton Keynes Local Plan (2005). We believe that its identification as a 'special area' in the 2005 Local Plan relates to either the fact that the site allocation was also carried forward in the 2005 Local Plan from its predecessor, or because the site was a cross boundary site with some development coming forward in Aylesbury Vale District Council's area (this element of the development has been delivered). There is however no need for this identification to still be present within the Plan:MK policy and therefore a modification has been proposed to remove the 'special area' reference.

5.35.3. With regards to the saved route for a proposed link road, this is carried forward from an already adopted plan and at this time remains only an aspiration. There is currently no certainty on the delivery of the proposed link road and therefore the route continues to be reserved within the site as per the existing policy within the Local Plan (2005) as the development is built out and completed. If/when Milton Keynes Council

look to consider the potential option of delivering a route, this would involve full engagement and cooperation with Aylesbury Vale District Council, however for the purposes of Plan:MK it is simply reserved as a potential route.

Q5.36 What is the planning status of the housing allocation at Eaton Leys (Policy SD15)? Have the proposed modifications in MK/SUB/004 satisfied Historic England's concerns regarding archaeological assets and consistency with paragraph 141 of the NPPF?

5.36.1. The Eaton Leys scheme mentioned in Policy SD15 received outline planning permission under application 15/01533/OUTEIS on the 2nd June 2017 for development with all matters reserved for a residential-led development including up to 1,800 dwellings, distributed between Aylesbury Vale and Milton Keynes. The Aylesbury Vale part of the development has since been withdrawn. Within Milton Keynes; the development was for up to 600 dwellings, a health & local centre including retail and a community centre, land for a one form entry primary school, associated highway infrastructure, children's play space and open space incorporating the scheduled monument etc.

Have the proposed modifications in MK/SUB/004 for SD15 satisfied Historic England's concerns regarding archaeological assets and consistency with paragraph 141 of the NPPF?

5.36.2. The Council has satisfied Historic England concerns both parties agreed to the proposed modifications for policy SD15 in the Statement of Common Ground agreed between Historic England and the Council. (PSPMK479).

5.36.3. Additionally in their response dated 10 December 2017 to application No. 17/02058/DISCON. Details submitted pursuant to discharge condition 40 (scheduled ancient monument management plan) at land at Eaton Leys, Galley Lane, Little Brickhill. Historic England raised no objection to the application on heritage grounds. An extract from their letter appears below.

Historic England Advice

'I have reviewed the revised document: Conservation Management Plan, Roman Town of Magiovinium Scheduled Monument, Eaton Leys, Milton Keynes, Final V2, November 2017, CGMS Doc. No. CC/16203 (for Gallagher Estates).

The plan has been submitted with reference to Condition 40:

Prior to the commencement of Development a management plan for the Scheduled Ancient Monument (SAM) shall be submitted to and approved in writing by the Local Planning Authority. This plan shall set out details and a timeline for the removal of the area of the SAM from agricultural use.

The document now sets out an appropriate strategy and timeline for the future sustainable management of the scheduled monument I advise that the condition can be discharged.'

Recommendation

'Historic England has no objection to the application on heritage grounds.'

Consistency with para 141 of the NPPF

'We have secured contributions through the s106 Agreement for Eaton Leys, 'To support better understanding and interpretation of Roman town of Magiovinium and Roman fort adjacent to the Site forming part of the SAM Open Space Site as well as capital costs and maintenance of works to the SAM Open Space Site necessary to improve or otherwise protect heritage assets within the SAM Open Space Site'. Our Senior Archaeological Officer and Principal Landscape Officer are on the team who are going to oversee the satisfaction of the obligation.

Q5.37 Are the sites in Policies SD19, SD20 and SD21 genuinely strategic sites? Are there comparable medium and smaller Plan:MK allocations or allocations carried forward from the SADPD in Appendix A of the Plan which merit a similar approach in terms of site specific issues relating to the nature and scale of development as set out in PPG para 12-010-20140306 - the 'what, where, when and how questions'?

5.37.1. Policy SD19 Central Bletchley is considered to be a strategic site as it has the potential to deliver more than 500 homes, based on the Council's description outlined in our response to the Inspector's initial Questions (INS1a). Furthermore, Policy SD19 relates to a number of linked sites not just one and is aimed at assisting the regeneration of Central Bletchley. It was therefore felt a specific policy was required.

5.37.2. The MK Rugby Club site (SD20) at Greenleys and the Walnuts Redhouse Park site (SD21) are not considered to be strategic in terms of their size, however they have been given specific policies due to site specific issues that required more detailed policy attention at this stage and because both allocations are looking to deliver more than just a purely residential scheme.

5.37.3. The specific issues for each site:

MK Rugby Club (SD20): This site has only been allocated to enable the redevelopment of existing playing fields and sports facilities on the site, which must be delivered as part of the scheme.

The Walnuts, Redhouse Park (SD21): Due to existing employment uses on parts of the site, the proximity of the site to the M1 Motorway and existing residential development, and a desire to enable the delivery of some retail use on site, it was felt that a more detailed policy was required to ensure the site can be developed in a planned manner taking consideration of the whole site rather than coming forward in a piecemeal fashion.

5.37.4. There are no other medium/smaller sites allocated through Plan:MK which we feel require this type of site specific policy. The only sites which are comparable in terms of size are those sites allocated within Central Milton Keynes and Campbell Park, however we do not feel that these allocations are subject to any site specific issues relating to the nature and scale of development as set out in the PPG, which cannot be covered through other policies proposed within Plan:MK, including those specific to Central Milton Keynes. Furthermore, given almost all of the sites within CMK and Campbell Park are under the ownership of Milton Keynes Development Partnership, prior to any marketing or development of the sites, MKDP are required, under their terms to have in place an adopted development brief, which has been publicly consulted on. This will ensure that all of these sites are assessed in more detail and guidance for their future development is provided.

5.37.5. With regards to sites from the SADPD, following the Inspector's conclusion that the plan is `adopted by the Council in July 2018. Therefore, all the sites included within the SADPD will have site specific policies in place, within the SADPD which can guide their development.

Q5.38 Is Plan:MK justified and effective in scheduling site allocations in an appendix rather than in a policy? Are there potential consultation / transparency issues with the submitted appendix approach?

5.38.1. The allocation of these sites is achieved through Bullet Point 7 of Policy DS2, which is clear in outlining that the relevant sites are named within Appendix A of the plan. The allocation of these sites through Policy DS2 we feel is justified and effective.

5.38.2. With regards to potential consultation/transparency issues, these sites are marked on the updated policies map as housing allocations and are included, with individual site maps, in the 'Proposed Submission Plan:MK Policies Map: Schedule of new and deleted designations' (MK/SUB/010), which was published as part of the Regulation 19 consultation. Both of these we believe assist in providing awareness of the proposed new designation of these sites in a transparent manner.

5.38.3. However, if you feel it would improve the plan, a schedule of the proposed small/medium sized sites could be added to Policy DS2, or alternatively, a separate, specific policy which allocates all of these sites could be added to the plan.

Q5.39 Have the medium and smaller Plan:MK housing allocations been based on a clear, robust process of site assessment and informed by sustainability appraisal? In particular:

i) Has an appropriate methodology been used and has it been applied consistently?

ii) Are the reasons for (a) selecting the sites in Policies SD19-20 and at Appendix A as the 'preferred sites' and (b) rejecting other potential options for medium/smaller housing sites been set out clearly and sufficiently?

iii) Would any inaccuracies in the assessments significantly undermine the overall soundness of the Plan?

5.39.1. There is a need to give separate consideration to A) sites within existing settlements; and B) sites on the edge of settlements:

5.39.2. A. Sites within existing settlements - The starting point was an understanding of the strategic context, including evidence gathered through the 2016 Strategic Development Directions (SDD) consultation, and the 2017 Draft Plan:MK consultation. On the basis of this strategic context, the decision was made to focus attention on the MK urban area, and also to rule out (as 'unreasonable') the option of allocating sites for 5,000 homes within the urban area (i.e. the high growth strategy that was the Draft Plan:MK preferred option, on the basis of the 2016 Urban Capacity Study).

- 5.39.3. All site options were then assessed through the SHLAA. This led to the identification of two alternative approaches that might be taken - 1) 2,900 homes at 50 sites; and 2) 3,500 homes at 78 sites - where the package of sites under Option 2 comprises all of the Option 1 sites, plus additional sites. This step is explained at paras 6.5.3 and 6.5.4 of the SA Report.
- 5.39.4. The next step was to subject these two alternative approaches to appraisal, as part of the appraisal of “reasonable spatial strategy alternatives”, as reported in Chapter 7 of the SA Report. In light of these steps, the Council was then able to select Option 1 (i.e. allocations for 2,900 homes) as the preferred option. This decision took account of consultation responses during the preparation of Plan:MK and was made on the basis that the Council did not want to reallocate amenity open space land within existing neighbourhoods, as would be necessary to achieve Option 2, due to the potential negative impact on existing communities.
- 5.39.5. B. Sites on the edge of settlements - Once again, the starting point was an understanding of the strategic context, including the 2015 SDD consultation, the 2017 Draft Plan:MK consultation, and an understanding that “substantial new developments” are supported by the MKFutures2050 Commission. On the basis of this strategic context, the decision was made to focus attention on the edge of the MK urban area.
- 5.39.6. All site options were then assessed through the SHLAA, and in total 6 small to medium sized sites were identified of which 4 were ruled out as undeliverable and undevelopable. The remaining two sites, Windmill Field, Calverton and Linford Lakes were then ruled out after further assessment.
- 5.39.7. The development of Windmill Field, Calverton was ruled out due to potential coalescence issues with the village of Calverton, whilst Linford Lakes was ruled out due to the potential harmful impact upon the character and appearance of a linear park and because of the sites high ecological value. This has subsequently been supported by the dismissal of an appeal on this site for the proposed development of 250 dwellings.
- 5.39.8. These conclusions were revisited through the SA process (see paras 6.3.5 to 6.4.4 / Table 6.3 of the SA Report), and ultimately it was determined that no site options needed to be progressed to further detailed analysis.
- 5.39.9. Finally, in respect of question (iii), given the smaller nature of most of these sites, it is unlikely that inaccuracies in the assessment of any of the sites and the potential

subsequent need to remove them from the plan would have a significant impact upon delivering the objectives, or housing requirement, of the plan, unless it was found that numerous sites had to be removed then the cumulative loss of housing numbers may have an impact.

- 5.39.10. However, it would be fair to conclude that any inaccuracies in the assessments could undermine the overall soundness of the Plan, given that there would be a need for modifications to be proposed (i.e. the removal or addition of one or more sites and/or modifications to policy wording).

Q5.40 What threshold was applied to site size in determining the allocations? Is it consistent with the PPG (3-010-20140306) which states that plan makers will need to assess a range of different site sizes and should consider all sites capable of delivering five or more dwellings?

- 5.40.1. For the purposes of determining site allocations, a threshold of 10 or more dwellings was used. The SHLAA, which provided the starting point for assessing potential sites for allocation, was prepared in line with the thresholds set out in the PPG and assessed all sites with potential for 5 or more dwellings.
- 5.40.2. The threshold of 10 or more dwellings is used by the Council for allocations due to it forming the definition for the major development category. For the purposes of housing monitoring and forecasting housing delivery, the Council only includes major development sites within its housing schedule, incorporating any sites under 10 dwellings within its windfall allowance for forecasting.
- 5.40.3. With Plan:MK proposing to incorporate a windfall allowance, which will capture the delivery of sites under 10 dwellings, it is felt that the threshold of 10 dwellings or more is suitable and that this approach is consistent with the PPG in giving consideration to the complete range of sites.

Attached:

Appendix A: Development Parcels in Campbell Park

Appendix B: Plan of Central Bletchley UDF Sites

Campbell Park Remainder (North Side)

CAMPBELL PARK

Land to North of Globe Roundabout, Overgate

Canalside Marina

G4.1

G4.2

G4.3

F4.4




Blocks 14A & 14B

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Draft Central Blechley Urban Design Framework

- | | |
|-----------------|--------------------------|
| 1 Retail Park | 10 MK College |
| 2 Remitone | 11 Police & Fire Station |
| 3 Burger King | 12 Network Rail |
| 4 Octavia | 13 Chandos Place |
| 5 Car Parking | 14 Queensway |
| 6 Co-op | 15 Bus Station |
| 7 Brunel Centre | 16 Saxon Street |
| 8 Sainsburys | 17 Wilkinsons |
| 9 Vodafone | |

Client			Project		
Draft Site Areas					
1:5000@A4	Drawn	Checked	08/06/2017	Dwg Number	
0m		200m		 	
					
© Crown Copyright and database rights [2012]. Ordnance Survey [100019593]					
Urban Design and Landscape Architecture					
Growth, Economy and Culture					
Civic Offices Saxon Gate East Milton Keynes MK9 3EJ					