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

MATTER SEVEN: INFRASTRUCTURE AND VIABILITY

QUESTIONS: Q7.1 – Q7.10

Issue 1 – Whether the overall approach to transport is justified, effective and consistent with national policy

Q7.1 What is the likely effect of the proposed scale and distribution of development in Plan:MK (above the reference case (existing planned/committed growth)) on existing transport infrastructure and traffic levels? How has this been assessed and is the transport evidence up-to-date and robust? Are the impacts from the proposals in Plan:MK on the strategic road network understood and is there sufficient detail in the LIP on the likely costs and funding sources of any strategic road network improvements?

7.1.1 The transport modelling of the cumulative effects of the growth proposed in Plan MK (over and above that of committed growth) with minimal mitigation has shown that Plan MK causes limited significant further impact on the network, other than links and junctions in close proximity to where this additional growth is located.

7.1.2 Plan:MK Scenario 1 has little impact over and above the Reference Case in terms of traffic flows and delays across the Milton Keynes urban area. Both M1 Junction 13 and Junction 14, although already experiencing issues of congestion in the Reference Case, are not significantly impacted. Scenario 1 however has a more notable impact around the South Caldecotte employment site and SE SUE (area north of the railway, referred to as SEMK within the modelling) with a number of junctions requiring further mitigation measures in addition to those required to address Reference Case issues.

7.1.3 Plan:MK Scenario 2 has greater impact than Scenario 1 in line with the additional quantum of development, though this impact is still relatively small in relation to the 2031 Reference Case. The main impacts are in the vicinity of the SE SUE and the East of M1 development sites. These developments were represented in the model including 'built-in' road infrastructure which help to mitigate some of the impacts of the additional traffic on the network, and in the case of East of M1 this new network has also helped alleviate some pressures on parallel routes. However the higher flows forecast in Scenario 2, particularly in relation to the East of M1 development, have resulted in new or additional congestion issues modelled around these development sites and further afield; with impacts on junctions in central Milton Keynes, and along the A422, V10 and V11 corridors.

7.1.4 New road capacity will be needed as Milton Keynes grows to access new areas of development and accommodate the increases in travel demand on the local network. Additional work is ongoing to test a range of highway mitigation measures relating to

the strategic allocations, the A5 and other parts of the local road network which are shown to be under pressure in 2031 (either due to committed and/or Plan:MK growth). However, there are limitations of a highways 'predict and provide' approach to mitigate the effects of the growth to 2031, where forecasts show numerous junctions being over capacity during peak travel periods in 2031. Pursuing such an approach would likely just move capacity issues further along a corridor (given the grid structure of the local road network) creating pressures and generating re-routing elsewhere.

7.1.5 The impacts of Plan:MK are understood but with the caveat of the limitations of strategic modelling, where effects on strategic routes may be expected to be reasonable (particularly in relative terms, e.g. the difference between Scenario 1 and the reference case) but accuracy on smaller roads and junctions will be lower. Hence the traffic model forecasts are a useful tool to plan transport improvements and guide land use planning, but are unlikely to provide a full enough appreciation of potential future transport conditions. Interpretation of the model outputs also need moderating by an understanding of how travel demand could change in future as a result of the mobility strategy but also wider trends in mobility and behaviours.

7.1.6 Even with this appreciation of uncertainties over future highway demand, and accepting that the network will be under more pressure in future years there are reasons to be comfortable with this given the capacity of the network to soak this up, and its benefit to future efforts to achieve modal shift and operate an effective park and ride system.

Q7.2 Does Plan:MK reflect and assist delivery of the latest MK Local Transport Plan?

7.2.1. The Council published its Local Transport Plan (LTP 3) in April 2011 for the planning period of 2011 – 2031. Continued changes in technology (e.g. autonomous vehicles) and Milton Keynes' aspiration to be at the forefront of these change, the Council has since published its Mobility Strategy for Milton Keynes for the period of 2018 – 2036 (LTP 4) Mobility for all in March 2018.

7.2.2. Chapter 8 (Transport and Connectivity), in particular, demonstrates the alignment of the Plan:MK with the MK Mobility Strategy. For example, paragraphs 8.4-8.15 summarises the transport policy context at national and local level. This includes an outline of the MK Mobility Strategy 2018-2036 and its LTP3 predecessor it evolved from. The 'Smart, Shared and Sustainable Mobility' project identified by the Milton

Keynes Futures 2050 commission is also recognised, which both the Mobility Strategy and Plan:MK aim to support progress towards.

7.2.3. Key local transport challenges are recognised in paragraphs 8.15-8.20 including the future growth in travel demand, public transport provision difficulties, high levels of single occupancy car use, rail capacity and the need for future modal shift to more sustainable modes of transport. Furthermore, strategic objectives, such as 12 and 14 place an emphasis to manage increased travel demands and promote the links between new development and sustainable forms of transport (e.g. public transport or smart, shared and sustainable mobility).

7.2.4. The Milton Keynes Mobility Strategy sets out four principle objectives, which were informed by the LTP3. They were:

1. **Support growth and mobility for all**
2. **Provide an effective network**
3. **Maximise travel choices**
4. **Protect transport users and the environment**

7.2.5. A broad overview to how the policies in Chapter 8 have sought to achieve the objectives of the MK Motilities Strategies are detailed below:

MK Mobility Strategy objectives	**Reflected in Plan:MK?**	**Policies to facilitate**
Support growth and mobility for all	**CT1** (Sustainable Transport Network): *Promote a sustainable pattern of development, minimising the need to travel and reducing dependence on the private car…. Promote improved access to key locations and services by all modes of transport and ensure good integration between transport modes….. Manage congestion and provide for consistent journey times…. Promote the usage of shared transport schemes in the borough*	**CT2** (Movement and Access): *development proposals will be required to minimise the need to travel, promote opportunities for sustainable transport modes, improve accessibility to services and support transition to a local carbon future;* **CT3** (Walking and Cycling)*;* **CT5** (Public Transport) & **CT8** (Grid Road Network)
Provide an effective	**CT1** (Sustainable Transport Network): *promote a safe, efficient and*	**CT2** (Movement and Access); **CT3** (Walking and

network	*convenient transport system*.	Cycling); **CT5** (Public Transport); **CT7** (Freight); **CT9** (Digital Communications)
Maximise travel choices	**CT1** (Sustainable Transport Network): *Promote transport choice, through improvements to public transport services and supporting infrastructure, and providing coherent and direct cycling and walking networks to provide a genuine alternative to the car.*	**CT2** (Movement and Access); **CT3** (Walking and Cycling); **CT5** (Public Transport) & **CT6** – Low Emission Vehicles
Protect transport users and the environment	**CT1** (Sustainable Transport Network): *Promote and improve safety, security and healthy lifestyles.*	**CT2** (Movement and Access) **CT3** (Walking and Cycling) **CT4** (Crossover on Redways) **CT5** (Public Transport) and **CT10** (Parking Provision)

7.2.6. In addition, other key policies include.

- **SD1** (Place-Making Principles for Development) demonstrates the importance to integrate new development with the adjoin features of the existing fabric of Milton Keynes e.g. integration through the existing grid road system – a feature that shaped the original city design. Provision of Park and Ride is also a feature of **SD17** for urban extensions within adjacent local authority areas.
- **Policy SD2** (Central Milton Keynes – Role and Function) also underlines CMK as focus for retails, office, residential, cultural and leisure activity. Again, ensuring proposed park and ride and mass transit systems more viable. Furthermore, **SD4** (Central Milton Keynes – Connectivity) ensures the future development in CMK is well integrated and accessible in turn promoting a low carbon transport agenda (e.g. sustainable mobility and enhance pedestrian and cycle routes).
- **SD11** (General Principles for Strategic Urban Extensions); **SD12** (Delivery of Strategic Urban Extensions); **SD13** (South East Milton Keynes Strategic Urban Extension); SD14 (Milton Keynes East) and SD15 (Land at East Leys, Little Brickhill) all promote the to support economic growth and enhance connectivity through the proposed urban extension in Plan:MK.
- **DS2** (Housing Strategy) Distribution of housing development focussed on the existing MK urban area and limited urban extensions and in turn, supporting access by sustainable modes.

- **DS3** (Employment Development Strategy) focusses on "development of Central Milton Keynes, retaining and developing existing employment sites and by allocating new employment land at appropriate locations" - again supports access by sustainable modes of transport.
- **DS4** (Retail and Leisure Development Strategy) focussed on CMK to support the future viability of a Park & Ride and mass transit systems, as well as support cycling access. Furthermore, supporting development at Bletchley which will become an enhanced transport hub with east west rail delivery.

7.2.7. To conclude, for the justifications outlined above, the council considers that Plan:MK reflects and assists the delivery of the latest MK Local Transport Plan.

Q7.3 Are there strategic proposals to manage traffic levels within MK in the medium to long term, for example Park & Ride, bus priority measures and rapid mass transit systems? Is there any certainty of their delivery within the Plan period or evidence to justify laying foundations (such as route safeguarding) in Plan:MK for their future implementation?

7.3.1 The main transport challenges for Milton Keynes are set out below:

- MK potential to grow from 268,000 to c 500,000 people by 2050.
- Additional 46,000 homes beyond the forecasts in current plans (28,000 in current plans), resulting in further traffic growth.
- Growth is an expectation for Milton Keynes meaning the current 25% inward commuting (50,000 commuters from regionals areas) is likely to increase bringing further pressure on the transport system.
- Mode share dominated by single occupancy car use, with low levels of cycling, walking and public transport.
- Bus patronage is declining with a marked decreased in 2017 /2018 by 12% from 2014 levels.
- Has the lowest bus satisfaction level of authorities who are measured.
- Reliable journey times for all modes of transport are needed for Milton Keynes to remain economically competitive.

7.3.2 To accommodate this growth in travel demand and respond to the challenges faced, the city needs to:-

- Stabilise average journey times and ensure they remain competitive while promoting the development of smart shared sustainable mobility for all;
- Provide a fully integrated and accessible public transport system - "Mobility as a Service" (MaaS).

- Develop and promote a 'First Last Mile' culture for future technologies such as autonomous and connected vehicles and sustainable connectivity.
- Ensure transport infrastructure is configured to enable the city's future development and growth in travel demand to be accommodated based on the council's 'First Last Mile' Strategy.

7.3.3 The MK Futures 2050 Commission report (MK/MIS/001) defines a long term vision for the city. The report identifies the need for 'Smart, Shared, Sustainable Mobility' to support future growth of the city's population; working on how transformational growth could be delivered based on high density development along rapid public transit corridors. Initiatives include shared use vehicles (such as autonomous pods, electric car share, and demand responsive services), direct commuter cycle network linking rail stations and Central Milton Keynes (CMK), and bus interchange and park & ride transport hubs.

7.3.4 The Council's Mobility Strategy for Milton Keynes (MK/TRA/001) is the reference point for how Milton Keynes wishes to maintain, improve and develop its transport system up to 2036. It also shows how Milton Keynes sees its short term investment support the development of the town's long term future transport system to 2050 and deliver the vision for transport set out in by MK Futures 2050 Commission to ensure connectivity to new infrastructure, such as East West Rail and the Expressway as outlined in the National Infrastructure Commission's final report (MK/INF/004) and the council's 'First Last Mile' strategy.

7.3.5 The strategy to enable a mode shift from car commuter journeys to more sustainable transport modes and transform connectivity in key commuter routes in the medium to long term include:

1. **Future transit corridors:** Plan for bus priority corridors in Milton Keynes to convert to mass transit corridors in long term and link to Oxford – Milton Keynes – Cambridge future transit corridor.
2. **Establish a Strategic Highway Infrastructure position:** for the Oxford to Cambridge Expressway to connect the strategic highway network in Milton Keynes. The forthcoming Major Road Network needs to be well connected to the expressway and to set out wider strategic road requirements for the city e.g. along the A421, A422, A5, A508, A509.
3. **Connectivity to East West Rail:** Western section expected to be delivered by Network Rail by 2024. Develop and promote an MKC position for connection to the East West Expressway. Ensure all rail stations on this corridor are linked to development sites and key destinations by viable sustainable transport options,

such as a bus priority/mass transit network, maximising opportunities for interchange through provision of links for walking /cycling.

4. **Local Highway Infrastructure:** Provide additional road capacity at congestion hotspots where required and ensure infrastructure is future proofed to enable more strategic interventions, such as bus priority or mass rapid transit.
5. **Provide new park and ride sites:** in the short term carry out feasibility work to assess potential for short term park & ride projects. In the long term work with neighbouring authorities to implement new park and ride sites where there is a high trip demand to the city centre from the north (eg.A5 and A509 / M1 J14), south (eg.A4126), west (eg.A421) and east(eg.J13) of CMK to support longer distance trips from outside Milton Keynes.
6. **Expand our existing local bus network and introduce bus priority lanes:** review the current bus network within Milton Keynes and expand to include bus priority lanes along key access routes to the city centre including use by multi occupancy vehicles (MOVs), powered two wheelers (PTW) and other sustainable modes in support of our mode-shift target where appropriate.
7. **Optimise public transport / mass transit access in new development areas:** Ensure new development areas have capacity for rapid personal and mass transit access including priority routes on main and local roads along with high quality and well sign-posted walking connections to mass transit boarding points and good quality facilities.

Q7.4 With reference to MK Local Investment Plan, what specific improvements to transport infrastructure or policy responses are proposed or will be required to support transport demands arising the Plan's overall strategy, including levels of growth?

7.4.1. The Local Investment Plan previously indicated that £235.1m is required to fund highways and transport infrastructure in support of committed growth. The Council accepts that there is a funding gap and therefore has to prioritise schemes based on need and wider policy objectives, including the Council's Mobility Strategy and Plan:MK.

7.4.2. With regard to meeting the demands arising from Plan:MK the council has produced a draft Infrastructure Delivery Plan which includes specific details of highways infrastructure that are likely to be needed to support the SE SUE and MKE SUE. This will be used to guide the preparation of their respective Development Frameworks. Further detail on this is set out in the Council's response under Q7.1 and Issues 2 and 3 of Matter 5.

7.4.3. However, the Council is seeking to move away from the normal highways 'predict and provide' approach, alluded to in the response to Q7.1. How the Council intends to move towards an approach that prioritises modal shift and meets wider transport and planning objectives is explained under Q7.3.

Q7.5 As part of transitioning to a low carbon future and securing modal shift, does the Plan sufficiently recognise the potential of new transport technologies (i.e. electric vehicles) as well as increasing non-car modes such as public transport, walking and cycling?

7.5.1. Strategic Objective 12 highlights the Council's desire to promote the potential of new transport technologies such as electric cars and enhancing the existing fabric of the redways network in Milton Keynes, which provides off road walking and cycling routes around the borough, and designated section, is included around support in sustainable forms of transport.

7.5.2. As part of the general principles for the strategic urban extensions (see Policy SD11), Plan:MK emphasises promoting a shift away from traditional forms of car use (i.e. petrol) towards low carbon forms of transport. The intention is to ensure that all development is integrated into the existing fabric of Milton Keynes.

7.5.3. Furthermore, Chapter 8 (Transport and Connectivity) specially proposes policies that promote the usage of new transport technologies such as electric vehicles. For example, policies CT6 (Low Emission vehicles) and CT10 (Parking provision) state the Council's criteria for all new development to maximise the opportunity for sustainable modes of transport (e.g. electric cars) and recognise the importance for new development to provide adequate electric vehicle charging points (EVCPs).

7.5.4. Finally, Plan:MK supports the objectives and aspirations outlined in the Mobility Strategy for Milton Keynes (2018 - 2016) and Milton Keynes Futures 2050 Commission report (please refer to Q7.2) to promote the usage of sustainable modes of transport.

Issue 2 - Infrastructure to support growth

Q7.6 Does the infrastructure evidence demonstrate that Plan:MK is soundly based and that the proposals within the Plan can be delivered in a timely and satisfactory manner?

7.6.1. The Council's Local Investment Plan principally relates to how the Council will invest in infrastructure to support existing committed growth within the current Development Plan. For that reason, the Council has prepared a draft Infrastructure Delivery Plan to

outline in broad strategic terms what is required to support Plan:MK as well as existing commitments, and to outline wider the context which governs how the infrastructure providers consider and approach the planning and delivery of infrastructure across Milton Keynes.

7.6.2. The draft Infrastructure Delivery Plan demonstrates in broad terms that there are no fundamental infrastructure deficits that undermine the choice or delivery of the strategy set out in Plan:MK, and that the new strategic allocations within Plan:MK (and existing allocations that will come forward during the plan period) can be supported by the timely delivery of the necessary of infrastructure.

Q7.7 Through existing, expanded or new provision, would there be capacity in infrastructure and services to serve the planned housing growth with reference to:
i) Power (gas/electricity networks)
ii) Schools
iii) Health facilities
iv) Leisure, public open space & allotments; and
v) Waste water treatment

i) Power (gas/electricity networks)

7.7.1. Electricity distribution in the Borough is the responsibility of Western Power Distribution (East Midlands) as the primary Distribution Network Operator (DNO). Gas supply responsibility for the majority of the Borough lies with SGN although some areas east of the M1 are served by Cadent Gas. Milton Keynes falls within the South East Midlands Local Enterprise Partnership and an energy strategy for the future is being developed at the SEMLEP level by the National Energy Foundation (NEF) and is expected to be available during the summer of this year. Part of the strategy will also be to identify any necessary actions to unblock growth over the short term. WPD itself has undertaken its own research to be used for shaping the sub-transmission network to 2030. The growth scenarios looked at variations in demand and distributed generation in the WPD East Midlands licence areas from 2016 to 2030. They also looked at their impact on the WPD sub-transmission network, consisting of electricity supply areas (ESAs) served by grid supply points (GSPs), bulk supply points (BSPs) and the 132kV networks. The forecasts for 33/11kV Primary Substations are aggregated into the upstream BSP forecast. These forecasts will inform the WPD investment plans for the next decade.

ii) Schools

7.7.2. The Council has a proven record in the delivery of new school places, meeting its statutory requirements to ensure sufficiency. In the last five years the Council has delivered new schools on major sites at Brooklands (Primary and Secondary), Fairfields, Newton Leys, Oakgrove and Whitehouse. The Council has also provided new Primary, Secondary and SEN schools at Kents Hill to cope with additional student numbers in the established settlements.

7.7.3. The Council continues to plan for the provision of an additional form of entry (30 pupil places in each year group) for every 500 new dwellings and these will be delivered in the appropriate form depending on the planned scale of the overall development. For Eaton Leys this will be a 1FE school, for Tickford Fields a 2FE, and for larger settlements such as the SE SUE or MKE the intention is to deliver Primary Schools at 3FE scale and Secondary at a minimum of 7 or 8FE.

iii) Health facilities

7.7.4. Milton Keynes forms part of the NHS B(edfordshire)L(uton)MK Sustainable Transformation Plan (STP) area and the work done by the STP bodies (which include MKC) will result in the submission of investment proposals for transforming services across the area which will go to the Department of Health in the summer 2018. Within Milton Keynes this will call for the provision of new Hubs, bringing together services for the North, Central and South areas. In the interim, whilst these proposals are being worked on and investment decisions decided, the Council has taken the lead in the provision of new large scale health centres for the Eastern and Western Expansion areas. Brooklands in the east will open in September this year with Whitehouse in the west opening in March 2020. Between them these new facilities will provide 45,000 new patient places dealing with demand from the expansion areas and providing some additional capacity to alleviate pressures on existing facilities.

7.7.5. Looking to the future, provision has been made within the Council's HIF bid to provide a further large scale health facility on the eastern side of the M1 should development here proceed at the scale envisaged. Milton Keynes also has a University Hospital with a recently opened Academic Centre. The University Hospital Trust has a well-developed Estates Strategy aimed at the continuous improvement as well as expansion of services which the Council continues to support including the recent agreement to provide £10m for the development of a new Cancer Centre on the Hospital campus. The campus site has capacity for continued development throughout the plan period and the Council remains committed to supporting the Trust in the delivery of the Estates Strategy.

iv) Leisure, public open space & allotments

7.7.6. The Council has recently completed new Community Sports Pavilions to support the associated playing fields (provided by developers through 'works in kind') at Broughton Gate and Brooklands in the Eastern Expansion Area. Similar provision is being actively planned at Tattenhoe Park (where the playing fields are already in use) and at Fairfields, Whitehouse and Wavendon. The Council will continue to look to developers, through the Development Framework process, to provide similar levels of provision in all new urban extensions and this will also apply equally to the provision of open space (mostly via extension of the linear park network) and play areas. New allotments have been and will be provided on all sites and offered to local parish and town councils when completed.

v) Waste water treatment

7.7.7. The steering committee responsible for coordinating waste management and associated infrastructure in the borough comprises the Council, Anglian Water (AWS) and the Environment Agency. AWS's role extends to implementation in the form of the five-year regulated Asset Management Periods (AMPs) wherein key infrastructure upgrades are addressed. For the period 2018 to 2031 the primary AMP periods applicable to AWS are AMP 7 (2020 - 2025) and AMP 8 (2025 – 2030). In general, upgrades to Water Recycling Centres (WRCs), where required to provide for additional growth, are wholly funded by the AWS through their Asset Management Programme. Present information available regarding the capacity within the 6 WRCs in the Borough would suggest that wastewater from the strategic growth areas can be accommodated by Cotton Valley Water Recycling Centre (WRC). With expected growth to 2031, Cotton Valley WRC will be well below its permitted dry weather consent; the residual housing headroom within the WRC is expected to be circa 54,500 based on 29,981 new homes during the Plan:MK period.

Q7.8 Are there contingencies for the potential non-delivery of infrastructure? Is the Plan sufficiently flexible to deal with this?

7.8.1. The Council's policy has always been to seek the delivery of infrastructure before expansion and whilst this can be difficult to maintain in periods of accelerated growth, infrastructure planning is always based on the principle of maintaining pace with expansion. Capacity across the Borough does allow for some early stages of development to be facilitated by existing provision but this capacity will always be limited and new provision, in essential services such as schools and health, is generally always required and planned accordingly. The Council and the local Clinical

Commissioning Group keep existing provision and its sufficiency under continuous review and will act accordingly, the recent schools provision at Kents Hill being a case in point. Basic infrastructure such as new highway and drainage capacity is largely the responsibility of developers with the Council acting as facilitator and also maintaining the functionality of the existing infrastructure. Within the current plan infrastructure delivery is already underway in the previously allocated expansion areas and there are no current impediments likely to prevent its successful completion. Whilst infrastructure planning is currently in its early stages for the proposed new allocations, this will include examining how we can use existing infrastructure to support early delivery phases as well as identifying risks and issues likely to impact on the earliest possible delivery of required new infrastructure.

Issue 3 – Policy INF1

Q7.9 Is Policy INF1 justified, effective and consistent with national policy? Does the policy strike an appropriate balance between providing certainty that the planning obligations sought by the development plan meet the 3 tests at NPPF paragraph 204 and the caution at paragraph 153 of the NPPF that SPD should not add unnecessarily to the financial burdens on development?

7.9.1. The policy itself refers at the outset to the provision of 'necessary on and off-site infrastructure required to support and mitigates the impact of (that) development'. In relation to any particular development the qualification ensures that the policy therefore aligns with both the statutory requirement (CIL Regs) and the NPPF and NPPG. The Council's focus in terms of infrastructure requirement is on the 'necessary' and the rest of INF1 is drafted very much along these lines including the focus on allowing developers to provide their own infrastructure and in having related development come together to provide 'jointly required infrastructure'. Our policy is very much to combine resources with the private sector to deliver successful growth.

7.9.2. In terms of the financial burden on development the Council has, through a report commissioned from consultants AECOM and HDH Planning & Development (MK/INF/006), tested the likely impact on most of the development typologies likely to come forward under Plan:MK and tested these at a level slightly above the highest point of financial contribution we currently seek.

7.9.3. This testing also took into account the 'burden' of compliance with other Plan:MK policies and found that virtually all development likely to come forward in the current market conditions under Plan:MK can support higher levels of contributions than it is

likely to be charged. There will always be exceptions but the Council does allow for viability and it can demonstrate a record of having exercised discretion in favour of development even in circumstances where the development cannot afford to make a full policy compliant level of contributions. Officers cannot recall the Council ever making a recommendation of refusal of an application solely on the grounds of lack of contributions. In conclusion the Council does consider Policy INF1 is justified, effective and consistent with national policy.

Q7.10 Is the Council contemplating CIL? Where off-site infrastructure is required is there evidence of a deliverable approach that would not contravene the pooling restrictions? Is the approach in Policy INF1 to voluntary agreements for joint infrastructure, across sites, robust and effective?

7.10.1. The Council has been keeping under review a potential move to a CIL regime for several years, but it has not moved to CIL in part because the Borough already had the benefit of its own very successful Tariff mechanism in its expansion areas. One factor influencing the Council's future views on CIL is that since 2015, CIL regulations have restricted the pooling of S106 contributions to being from no more than five developments for the funding and provision of an infrastructure project or type of infrastructure. However, in its recent 'Supporting Housing Delivery through Developer Contributions' consultation paper, the Government has suggested that this pooling restriction might be removed for non-CIL local authorities such as Milton Keynes where a significant proportion of new housing derives from a limited number of large site developments. The Council is waiting to see if the Government will offer the concession to remove these pooling restrictions which would allow the Borough to maintain its preferred approach to funding the infrastructure requirements of large scale expansion.

7.10.2. In terms of the second and third parts of the question, the Council has the ability to pool up to five contributions to an infrastructure project and this gives us some latitude even where Regulation 123 leaves us in a less than ideal situation. The wording of Policy INF1 is intended to reflect the current statutory position in terms of pooling and can work where you have developers with a common interest in the delivery of particular pieces of infrastructure from which they will each derive benefit. This will be of particular application in the delivery of the urban extensions where we are working with the developer 'consortiums' on development frameworks which will identify the key infrastructure requirements.

7.10.3. The experience of the Milton Keynes Tariff has been that 'voluntary' agreements can be robust and effective, but where the pooling restrictions do currently cause us issues, in relation to strategic 'city-wide' requirements to reflect the step changes in the overall population of the Borough, we hope that the forthcoming Government response to the developer contributions consultation will afford us some latitude.